

Kane-Elgin HOME Consortium

Kane County, City of Elgin

HOME - American Rescue Program (HOME- ARP) Allocation Plan

HOME ARP Allocation Plan Executive Summary

In September 2021, the U.S. Department of Housing and Urban Development announced the allocation of \$3,399,022 to the Kane-Elgin HOME Consortium for the Home Investment Partnerships Grant American Relief Plan (HOME-ARP). The Kane- Elgin HOME Consortium covers all of Kane County with the exception of the City of Aurora (see page 3 for map).

The purpose of HOME-ARP funds is to provide homelessness assistance and supportive services through several eligible activities. Eligible activities include acquisition and development of non-congregate shelter, tenant based rental assistance, supportive services, HOME-ARP rental housing development, administration and planning, and nonprofit operating and capacity building assistance.

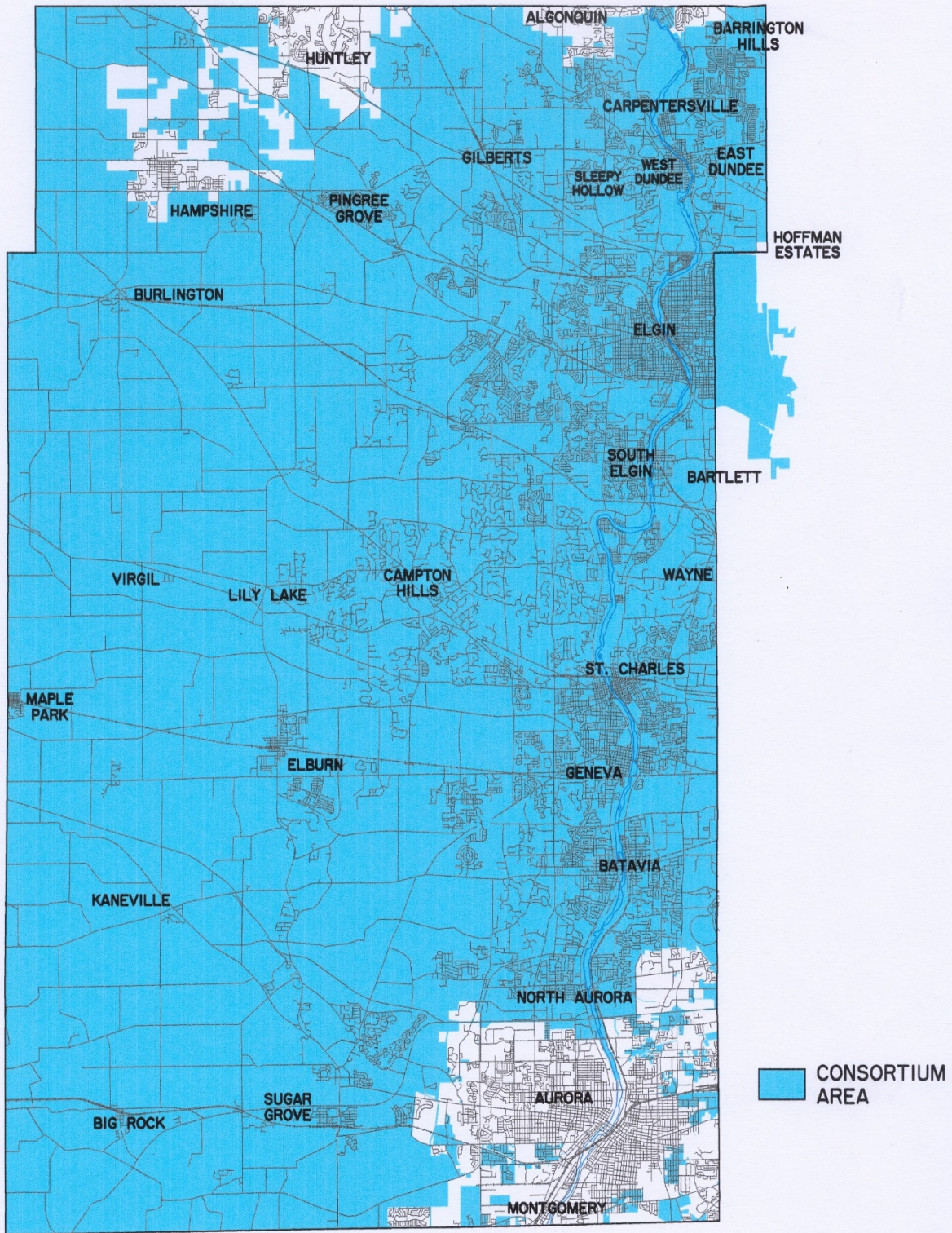
HOME-ARP funds must assist people who are members of "qualifying populations" which are defined in CPD Notice 21-10. Qualifying populations include the following:

- Sheltered and unsheltered homeless populations
- Those currently housed populations at risk of homelessness
- Those fleeing or attempting to flee domestic violence or human trafficking
- Other families requiring services or housing assistance or to prevent homelessness or those at greatest risk of housing instability or in unstable housing situations.

To determine how to best utilize these funds, the Consortium consulted with multiple staff from 15 partner agencies throughout the jurisdiction. The agencies represented a variety of stakeholders including social services, hospitals, school districts, and municipalities. These consultations took place in the form of surveys as well as virtual interviews that lasted up to an hour. Overwhelmingly, participants identified the need for Rental Assistance as a top priority for eligible households. In addition to Rental Assistance, the Consortium will fund Supportive Services which will assist households lacking in skills and necessities on their journey to self-sufficiency. Within the HOME- ARP category of Supportive Services, recipients are able to provide rental assistance for up to 24 months, as well as a robust array of supportive services that will assist households in overcoming their barriers to housing stability. To ensure best outcomes, the Consortium is proposing the following budget:

Eligible Activity	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 2,889,169	85%	
Acquisition and Development of Non-Congregate Shelters	\$		
Tenant Based Rental Assistance (TBRA)	\$		
Development of Affordable Rental Housing	\$		
Non-Profit Operating	\$	%	5%
Non-Profit Capacity Building	\$	%	5%
Administration and Planning	\$ 509,853	15%	15%
Total HOME ARP Allocation	\$ 3,399,022		

KANE-ELGIN CONSORTIUM AREA



Consultation

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

After reviewing the HOME-ARP notice and HUD's description of eligible activities and qualifying populations, staff for the Kane-Elgin HOME Consortium developed a list of key contacts that represent all of the partners of the Aurora / Elgin / Kane County Continuum of Care, which do not exclusively serve the City of Aurora. Partners were made aware that the Kane-Elgin HOME Consortium's jurisdiction for this HOME-ARP program does not include Aurora (a separate PJ). This list was also expanded to include agencies that are known to encounter qualified populations and includes each agency type named in CPD Notice 21-10.

Phase I – Online Survey

The first action of the Kane-Elgin HOME Consortium was to develop designed to identify specific unmet housing and service needs amongst the qualified populations to inform the development of a plan to implement the HOME-ARP program. Staff developed a survey outlining the various Qualifying Populations and Eligible Activities to be disseminated to various stakeholders.

Every Kane Continuum of Care partner and most often, multiple representatives from each organization received a survey request. This survey was also disseminated to agencies that are known to encounter the qualified populations but do not participate in the Continuum of Care. Staff of the Kane-Elgin HOME Consortium ensured that each agency type named in CPD Notice 21-10 were invited to take the survey.

Each person receiving a survey request was asked to forward the request and link to any or all persons that, to their knowledge, may also serve one of the qualifying populations.

The survey request included an explanation of the Kane-Elgin HOME Consortium, a brief overview of the American Rescue Plan (ARP), the purpose of the HOME-ARP program, the amount of funds available, eligibility (qualified populations), eligible activities, and an overview of the HOME-ARP planning and plan development process.

In taking the survey, each respondent was first asked to provide contact information and their role within the agency. Respondents were then asked to identify special populations served; this in a special effort to assure inclusiveness in the Kane-Elgin HOME Consortium's planning efforts.

Those taking part in the survey were then asked to identify whether or not they served any of the following populations;

Qualifying Population 1 – Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a)).

The survey question specific to this population read as follows: Do you or those you supervise have significant and direct contact with clients who are homeless, meaning that they are living on streets, in emergency shelters, or within 14 days of eviction with no resources for housing?

Qualifying Population 2 – At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(1)).

The survey question specific to this population read as follows: Do you or those you supervise have significant and direct contact with individuals or families living at or below 30% AMI, who also (a) have moved two or more times in the past two months, (b) live with others due to economic hardship, (c) received notice of eviction and must move within 3 weeks, (d) utilize their own resources to live in a hotel/motel, (e) live in overcrowded housing, (f) are exiting an institution with no identified resources for housing, or (g) are otherwise is at risk of homelessness?

Qualifying Population 3 – Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary.

The survey question specific to this population read as follows: Do you or those you supervise have significant and direct contact with individuals or families fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking?

Qualifying Population 4 – In other populations where providing supportive services or assistance under section 212(a) of the Act (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability.

The survey question specific to this population read as follows: Do you or those you supervise have significant and direct contact with persons who ... are not housing stable because they are either – (a) formerly homeless and need services to avoid a return to homelessness, (b) live at or below 30% of the area median income and pay greater than 50% of household income for housing, or (c) live at or below 50% of the area median income and are experiencing severe housing instability?

Those answering “Yes” to serving any one of the 4 populations, and specific to each one of the 4 populations, were then asked to identify unmet needs as “High, Medium, Low or None” for the following housing types:

1. Emergency Short Term Shelter (congregate, non-congregate*, overflow hotel/motel vouchers, etc.)

2. Temporary or Transitional Housing (congregate, non-congregate -- typically with intensive onsite services)

3. Affordable Permanent Supportive Housing (apartments*, tenant based rental assistance*, etc. -- with appropriate levels of supportive services)

4. Affordable Permanent Housing (apartments*, tenant based rental assistance*, etc. -- no supportive services). Based on input from respondents, there was great emphasis on the need for rent subsidies for qualified populations within otherwise “affordable” or market rate housing. As a result, and for clarity, this housing type is further referred to in this plan as “rent subsidized affordable housing.”

In addition to the questions related to housing needs of the qualifying populations, respondents were asked to specifically identify gaps in supportive services*.

A total of 24 organizations, and 50 individuals representing those organizations were asked to complete the survey. Requests were initiated by email on March 22, 2022. This was followed up by additional requests on April 6, 2022. A total of 36 individuals representing 24 organizations completed the survey. The 24 organizations completing the survey represent full participation by all of the organization types required for consultation that are named in the CPD Notice 21-10. Other organization types participating included youth <25 housing and/or service organizations, and a HUD-certified housing counseling agency.

Phase II - Video Conference with PJ Staff

As a follow-up to the online survey, the PJ identified 17 key staff from 15 organizations who were asked to participate in consultations with PJ staff on HOME-ARP needs. 11 staff from 10 organizations participated in Video Conference Follow-Up. 5 organizations did not respond to the request for a Video Conference Follow up. Multiple outreach attempts were made via e-mail and phone calls. Each consultation lasted from 30 to 40 minutes was facilitated by two Kane-Elgin HOME Consortium staff, and generally, followed the same format as the online survey for clarity and reference.

List the Organizations Consulted

Notice CPD-21-10, Requirements for the Use of Funds in the HOME-ARP Program (the “HUD Notice”) names seven (7) types of organizations that must be consulted with in the development of this plan. Those organization types include:

1. **Continuums of Care (CoCs):** 1 CoC consulted – the Kane-Elgin HOME Consortium participates in a single CoC.

2. **Homeless Service Providers:** 8 providers were consulted. This represents 100% of all agencies whose primary mission is serving homeless populations.
3. **Domestic Violence Service Providers:**2 providers were consulted
4. **Veterans' Groups:** 2 providers were consulted
5. **Public Housing Agencies (PHAs):** 1 PHA consulted – the Kane-Elgin HOME Consortium has a single PHA within its jurisdiction
6. **Public agencies that address the needs of the qualifying populations:**11 providers consulted, and
7. **Public or private organizations that address fair housing, civil rights, and the needs of person with disabilities:**10 providers consulted

In addition to the 7 organization types listed in CPD Notice 21-10, the Kane-Elgin HOME Consortium also consulted with 2 youth <25 providers; 360 Youth Services as well as multiple McKinney Vento liaisons for school districts and a HUD-certified housing counseling agency.

Acronyms used in the following charts:

CoC - Continuum of Care

DV - generally meaning persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking

HSS - housing support services

MH - mental health

MHSA - mental health and substance abuse

PSH - permanent supportive housing

RA - rental assistance

TBRA - tenant based rental assistance

TH - transitional housing

The following table is a summary of the Kane - Elgin HOME Consortium's efforts to consult with the agencies prior to development of this plan.

Agency / Organization Consulted	Type of Agency / Organization	Method of Consultation
<u>1. Aurora / Elgin / Kane County CoC</u>	Org Type 1. Continuum of Care	Online Survey and Video Conference Follow-up
Feedback		
Respondent 1, Online Survey - highest need is for rent subsidized affordable housing and permanent supportive housing. Service gaps include outreach, prevention, short term RA, case management, housing support services, community housing management, benefits		

Agency / Organization Consulted	Type of Agency / Organization	Method of Consultation
<p>specialists, child care, transportation, housing placement, transportation, legal services, and life skill development services.</p> <p>Respondent 1 - Video Conference Consultation with PJ - CoC staff lead. Participated in all consultations.</p>		
<p><u>2. Public Action to Deliver Shelter (PADS) of Elgin – 60 bed congregate shelter primarily serving individuals</u></p>	<p>Org Type 2. Homeless Housing and Service Provider</p>	<p>Online Survey and Video Conference Follow-up</p>
<p>Feedback</p>		
<p>Respondent 2, Online Survey - Highest need for literally homeless is permanent supportive housing (PSH); for youth is transitional, PSH and rent subsidized affordable housing; for at risk is PSH and rent subsidized affordable housing; and for DV is TH, PSH and rent subsidized affordable housing. For the literally homeless, gaps in services include HSS, community housing management, transportation, MH and legal services.</p> <p>Respondent 3, Online Survey - highest need rent subsidized affordable housing and PSH, TBRA or apartments. Service gaps include outreach, prevention, short term RA, child care, housing support services, community housing management, and legal services.</p> <p>Respondent 4 - Video Conference Consultation with PJ - Respondent cites MHSA population as underserved because many are service resistant. High need for outreach. Need MH and primary care staff in house. With regard to rent subsidized affordable housing and permanent supportive housing, indicates that “a huge lift is needed with a 1% vacancy rate.” Agency is seeking to re-design and relocate emergency shelter operations, and they are seeking financial assistance for this.</p>		
<p><u>3. Ecker Center for Behavioral Health, Elgin – Community mental health and substance abuse provider. Activities include permanent supportive housing, homelessness prevention, and outreach.</u></p>	<p>Org Type 2, Homeless Service Provider</p> <p>Org Type 6, Public agency addressing the needs of qualifying populations and</p> <p>Org Type 7, Organization addressing the needs of persons with disabilities</p>	<p>Online Survey and Video Conference Follow-up</p>
<p>Feedback</p>		

Agency / Organization Consulted	Type of Agency / Organization	Method of Consultation
<p>Respondent 5, Online Survey - also lists case management as a service gap. Additional services needed for “at risk” populations include prevention, housing support services, community housing management, additional MHSA services, and benefits specialists. Listed all named subgroups as “underserved.”</p> <p>Respondent 6, Online Survey - highest need rent subsidized affordable housing, TBRA or apartments.</p> <p>Respondent 7, Online Survey - started the survey but did not answer any pertinent questions.</p> <p>Respondent 5 - Video Conference Consultation with PJ - Primarily serve MHSA populations. High need for TBRA. Prevention and short-term rental assistance clients are often returning for assistance due to severe rent burden. Rent inflation and low vacancy rates exacerbate the problem. Additional affordable housing is also a high need. Gap in resources for additional staff to provide housing support services. MHSA populations are underserved.</p>		
<p><u>4. Community Crisis Center, Elgin – provides shelter and comprehensive services for persons fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking</u></p>	<p>Org Type 3, Domestic Violence Service Provider</p>	<p>Online Survey and Video Conference Follow-up</p>
<p>Feedback</p>		
<p>Respondent 8, Online Survey - Emergency shelter is the highest need. Vets are underserved, and transportation for Vets is a high unmet need.</p> <p>Respondent 9, Online Survey - Highest needs are for rent subsidized affordable housing, emergency shelter for youth <25 and at risk populations, and permanent supportive housing for persons at risk and living in government supported housing. Service gaps include case management, as well as housing supports and employment assistance for those at risk and living in government supported housing.</p> <p>Respondent 10, Online Survey - High need for all housing types except for emergency shelter. Gaps in services for housing supports, search and placement, benefits specialists, and life skills. Persons with disabilities are underserved.</p> <p>Respondents 8 and 10 - Video Conference Consultation with PJ -</p>		

Agency / Organization Consulted	Type of Agency / Organization	Method of Consultation
Primarily DV agency. Also, serve general homeless populations. Highest need is subsidized housing, TBRA or facility based. Many clients on disability or fixed income. High-unmet needs for housing support services and transportation.		
<u>5. Lazarus House, St. Charles – 50 beds, + TH, Prevention</u>	Org Type 2. Homeless Housing and Service Provider	Online Survey and Video Conference Follow-up
Feedback		
<p>Respondent 11, Online Survey - highest need rent subsidized affordable housing, TBRA or apartments. Service gaps include prevention, HSS, community housing management, employment services, housing placement, and legal services.</p> <p>Respondent 12, Online Survey - Highest need is rent subsidized affordable housing. Gaps in housing and services for seniors and for LGBTQ+ populations. Gaps in services for outreach, prevention, case management, MHAD, housing supports, benefits, education, employment, and life skills services.</p> <p>Respondent 13, Online Survey - Rent subsidized affordable housing is “by far” the greatest need. Households with incomes between poverty and the amount needed to enter “affordable housing” falling through the cracks. The system incentivizes households to keep their incomes low so that they will continue to qualify. Gaps in almost all service areas, but legal services cited as, perhaps, the highest need.</p> <p>Respondent 12 - Video Conference Consultation with PJ - Shelter primarily serves individuals from streets, fleeing DV, living in cars, living short term with relatives or friends, etc. Many have MHSA issues. MHSA, LGBTQ+ and elderly residents are underserved. Highest need is rent subsidized affordable housing. Frustrated with TBRA because of extensive requirements that exacerbate clients with ongoing MH and DD issues, as well as lack of units due to low vacancy rates, high rents and landlords who are not willing to work with clients.</p>		
<u>6. Kane County – Rapid ReHousing, Homelessness Prevention</u>	Org Type 2, Homeless Service Provider Org Type 6, Public agency addressing the needs of qualifying populations	Online Survey and Video Conference Follow-up
Feedback		
<p>Respondents 14 and 15, Online Surveys (answers consistent) - Permanent supportive housing is a high need for those who are literally homeless. At risk populations have a high need for all forms of assisted or affordable housing. Increased housing costs since the onset of the pandemic have exacerbated housing assistance needs for at risk populations. There are gaps in the availability of services for almost all of the services named in the survey.</p> <p>Respondent 14 - Video Conference Consultation with PJ - TBRA is the highest priority. Primarily serving literally homelessness due to lack of resources for other HOME-ARP</p>		

Agency / Organization Consulted	Type of Agency / Organization	Method of Consultation
qualifying populations. Also serving victims of domestic / dating violence, sexual assault and/or stalking. Undocumented Hispanics underserved.		
<u>7. 360 Youth Services – Outreach and services for youth <25. Participates in CoC coordinated entry. Navigates youth to housing and services</u>	Org Type 2, Homeless Service Provider Org Type 3, Domestic violence service provider for youth <25 and Org Type 7, Organization addressing fair housing, and civil rights	Online Survey and Video Conference Follow-up
Feedback		
<p>Respondent 16, Online Survey - In addition to transitional housing, there is a high need for affordable housing and permanent supportive housing. Also there are gaps in services for outreach, case management, housing support services, child care, life skills, employment assistance, MHSA, education, employment, education, housing search, and legal. Gaps in housing and services for youth <25 in all other subgroups.</p> <p>Respondent 16 - Video Conference Consultation with PJ - Serve large LGBTQ and African American populations. About 75% of clients have MHSA or both. Highest need is for TBRA. Waiting list for the existing transitional housing program is 25. High need for housing search, placement, etc. and for transportation.</p>		
<u>8. Public Action to Deliver Shelter, Inc., d/b/a Hesed House – Homeless shelter provider</u>	Org Type 2, Homeless Service Provider	Online Survey
Feedback		
<p>Respondent 17, Online Survey - Highest priority for literally homeless is permanent supportive housing (PSH), for youth is shelter, for at risk is rent subsidized affordable housing, for DV is TH and rent subsidized affordable housing. Service gaps, dependent upon qualifying populations, include outreach, prevention, short term RA, case management, housing support services, education, employment, legal, and housing placement services. Chronic homeless appear to be underserved.</p> <p>Respondent 18, Online Survey - Highest needs are emergency shelter, rent subsidized affordable housing and PSH.</p> <p>Respondent 19, Online Survey - Highest needs are rent subsidized affordable housing and PSH.</p>		

Agency / Organization Consulted	Type of Agency / Organization	Method of Consultation
<p><u>9. Hines VA Hospital – Homeless Housing and Service Provider / Veterans / Mental Health and Substance Abuse. Participates with PHA in VASH program</u></p>	<p>Org Type 2, Homeless Service Provider</p> <p>Org Type 4, Veterans’ Groups</p> <p>Org Type 6, Public agency addressing the needs of qualifying populations and</p> <p>Org Type 7, Organization addressing the needs of persons with disabilities</p>	<p>Online Survey and Video Conference Follow-up</p>
<p>Feedback</p>		
<p>Respondent 20, Online Survey - Cited emergency shelter, temporary or transitional housing and rent subsidized affordable housing as high need. Gaps in services include outreach, assessment and referral, prevention, case management, housing support services, and mental health services.</p> <p>Respondent 21, Online Survey - High need for all forms of housing except for transitional. Literally homeless people need PSH. Vets have gaps in services for coordinated entry.</p> <p>Respondent 21 - Video Conference Consultation with PJ - 90% of clients are MHSA. Mostly men, but a few women and a few youth <25. Have VASH for TBRA, but the program is limited to those with lowest incomes. Many lower income referrals who are homeless or at risk are turned away. National Guard and reservists in need are also not eligible. These calls for assistance total approximately 120 per month. Highest need is TBRA, search and placement, and housing support services for this group.</p>		
<p><u>10. Kane County Veterans Asst. Commission – Service provider addressing the needs of veterans</u></p>	<p>Org Type 4, Veterans’ Groups</p>	<p>Online Survey Requested</p>
<p>Feedback</p>		
<p>This agency did not respond to PJ’s survey request.</p>		
<p><u>11. Midwest Shelter for Homeless Veterans – Homeless housing and service provider</u></p>	<p>Org Type 4, Veterans’ Groups</p>	<p>Online Survey</p>

Agency / Organization Consulted	Type of Agency / Organization	Method of Consultation
Feedback		
Respondent 22, Online Survey - Cites permanent supportive housing as highest need.		
<u>12. Housing Auth of Elgin – HCVP, Emergency</u>	Org Type 4, Veterans’ Groups Org Type 5, Public Housing Agencies (PHAs) Org Type 6, Public agency addressing the needs of qualifying populations, and Org Type 7, Organization addressing the needs of persons with disabilities	Online Survey This agency did not respond to the PJ’s request for a conference
Feedback		
Respondent 23, Online Survey - Agency has specialized services for Veterans (VASH), DV and elderly clients. High need cited for rent subsidized affordable housing, and for permanent supportive housing. Gaps in services for outreach and for benefits specialists. Respondent 24, Online Survey - Highest needs are for emergency shelter and temporary / transitional housing. Cites issues with housing supply and other things that appear to be associated with the VASH program.		
<u>13. City of Elgin – Social service to encampments by police</u>	Org Type 6, Public agency addressing the needs of qualifying populations	online survey and video conference
Feedback		
This agency did not respond to the PJ’s requests to complete survey or a video conference.		
<u>14. Amita St. Joseph Hospital - Serves all special populations with health services. Specialized services for mental health</u>	Org Type 6, Public agency addressing the needs of qualifying populations Org Type 7, Organization addressing the needs of persons with disabilities	Online Survey
Feedback		

Agency / Organization Consulted	Type of Agency / Organization	Method of Consultation
<p>Respondent 25, Online Survey - Primarily serves literally homeless and at risk. Indicates that the highest need is for rent subsidized affordable housing. There are gaps in temporary / transitional housing. Gaps in services for outreach, prevention, case management, housing support services, MHSA, transportation, life skills, and health services.</p>		
<p><u>15. Kane County Regional Office of Education – Homeless Liaison</u></p> <p><u>16. U46 School District - Homeless Liaison</u></p> <p><u>Addressing the needs of school age children and their families</u></p>	<p>Org Type 6, Public agency addressing the needs of qualifying populations</p>	<p>Online Survey and Video Conference Follow-up</p>
<p>Feedback</p>		
<p>Respondent 26, Online Survey - Highest need is for all types of housing. Gaps in almost all services. Specifically mentions need for what appear to be housing support services. Hispanic and youth are underserved.</p> <p>Respondent 27, Online Survey - High need for shelter, permanent, and transitional housing. Gaps in services for prevention, short term RA, child care, transportation, case management, housing support, mental health, legal, and housing placement services.</p> <p>Respondent 28, Online Survey - Respondent cites emergency shelter, temporary / transitional housing, rent subsidized affordable housing and permanent supportive housing as high needs. Also cites gaps in almost all service areas named in the survey.</p> <p>Respondents 26, 27 and 28 - Video Conference Consultation with PJ - Zoom conference held with the group, representing 2 school districts, at their request. Clients are school-age children and their families. High need for housing that includes rental assistance for unstable families. High need for housing placement services and ongoing housing support services. Refugees, undocumented and unaccompanied homeless school age children (approx. 14 - 17 y.o.) are at a high need for housing assistance.</p>		
<p><u>17. District 301 – Homeless Liaison</u></p> <p><u>Addressing the needs of school age</u></p>	<p>Org Type 6, Public agency addressing the needs of qualifying populations</p>	<p>Online Survey</p>

Agency / Organization Consulted	Type of Agency / Organization	Method of Consultation
<u>children and their families</u>		
Feedback		
Respondent 29, Online Survey - started the survey but did not answer any questions		
18. Two Rivers Head Start <u>Addressing the needs of school age children and their families</u>	Org Type 6, Public agency addressing the needs of qualifying populations	Online Survey
Feedback		
Respondent 30, Online Survey - highest need rent subsidized affordable housing and permanent supportive housing. Indicated that there was a significant gap in almost every service. Indicates that Hispanic, African Americans and Veterans are underserved.		
19. The Neighbor Project – HUD certified housing counseling agency	Org Type 4, Veterans’ Groups Org Type 7. Private organization that address fair housing, civil rights, and the needs of person with disabilities	Online Survey
Feedback		
Respondent 31, Online Survey - Lists Vets, LGBTQ, disabled, elderly and formerly homeless as special populations served by the organization. High need for rent subsidized affordable housing for literal and at risk, and high need for permanent supportive housing to serve persons at risk residing in government housing programs. Cites gaps in services for HSS, community housing management, housing placement, prevention and life skills		
20. Association for Individual Development (AID) – Elgin and Kane County – Large organization serving mental health population and persons with disabilities	Org Type 2, Homeless Service Provider Org Type 7, Private organization that address fair housing, civil rights, and the needs of person with disabilities	Online Survey and Video Conference Follow-up
Feedback		

Agency / Organization Consulted	Type of Agency / Organization	Method of Consultation
<p>Respondent 32, Online Survey - Agency cites rent subsidized affordable housing and emergency shelter as high needs for literally homeless. For at risk, all housing types have high unmet need. Gaps in almost all of the service areas. Cites “discrimination in housing access” for those with rental assistance vouchers.</p> <p>Respondent 32 - Video Conference Consultation with PJ - Due to extremely low vacancy rates and high rents, rent subsidized affordable housing is seen as the highest need. Also non-congregate shelter strictly following the harm reduction model is a high need. Did not identify any service areas as high need.</p>		
<p><u>21. Prairie State Legal Services, County-wide</u></p>	<p>Org Type 4, Veterans’ Groups</p> <p>Org Type 7, Private organization that address fair housing, civil rights, and the needs of person with disabilities</p>	<p>Online Survey and Video Conference Follow-up</p>
<p>Feedback</p>		
<p>Respondent 33, Online Survey - All housing needs are high. Survey was consistent with conference feedback.</p> <p>Respondent 33 - Video Conference Consultation with PJ - Organization has special programs for Veterans, so there is priority for Vets. Have bilingual attorneys and serve a lot of Spanish speakers. Stated that continuing ongoing rental assistance programs would be a high priority. Vacancy rates are low, and housing is scarce, so disrupting those currently being assisted would have negative impacts. High service needs for housing placement. Very low housing availability, so vouchers are going unused. Clients have barriers limiting their ability to complete requirements for rental assistance programs without help from housing placement staff. Development of non-congregate emergency shelter (scattered site or facility based) is also a high priority.</p>		
<p><u>22. Easterseals DuPage and Fox Valley</u></p>	<p>Org Type 7, Private organization that address the needs of person with disabilities</p>	<p>Online Survey</p>
<p>Feedback</p>		
<p>Respondent 34, Online Survey - ... <i>“adults with disabilities who require full time or part time support”</i> have housing and services gaps.</p>		
<p><u>23. AgeGuide Northeastern Illinois - serves aging population</u></p>	<p>Org Type 6, Public agency addressing the needs of qualifying populations</p> <p>Org Type 7, Public organization that address fair housing, civil rights, and the needs of person with disabilities</p>	<p>Online Survey</p>
<p>Feedback</p>		

Agency / Organization Consulted	Type of Agency / Organization	Method of Consultation
Respondent 35, Online Survey - High need for rent supported affordable housing that also meets the accessibility needs of elderly persons living with disabilities.		
<u>24. Elgin Food Ministry Cooperative (Highland Avenue Church of the Brethren)</u>	Org Type 6, Agency addressing the needs of qualifying populations	Online Survey
Feedback		
Respondent 36, Online Survey - started survey but did not finish		

Summarize feedback received and results of upfront consultation with these entities

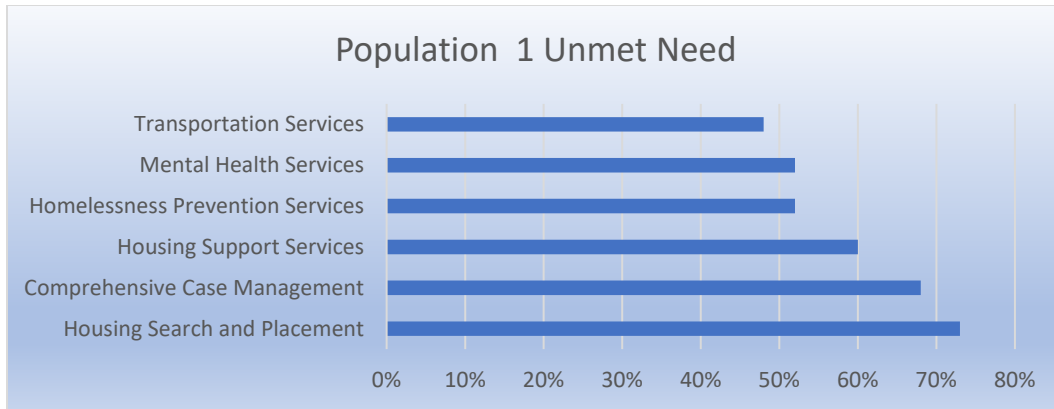
A consensus of agencies participating in consultations indicated that the populations served were reasonably proportionate to the demographic composition of the Kane - Elgin HOME Consortium as a whole. The exception, based on consultation with providers, is that most Veterans are men.

Population 1 - Homeless:

Based on the survey of 36 individuals, or respondents, (representing 24 providers), 73% named permanent supportive housing and 53% named rent subsidized affordable as a “high” unmet housing needs. Further, and as discussed in the previous section, the current estimated size of this population in the Kane CoC is 292 households.

With regard to unmet service needs for this population, the most frequent choices from survey respondents were –

- Housing search and placement (including landlord negotiation), 73% of respondents;
- Comprehensive case management, 68%;
- Housing support services - regularly working on site with clients to assure long term housing stability, 60%;
- Homelessness prevention services, including rent/utility subsidies in order to address short term issues, 52%;
- Mental health services, 52%; and
- Transportation services, 48%.



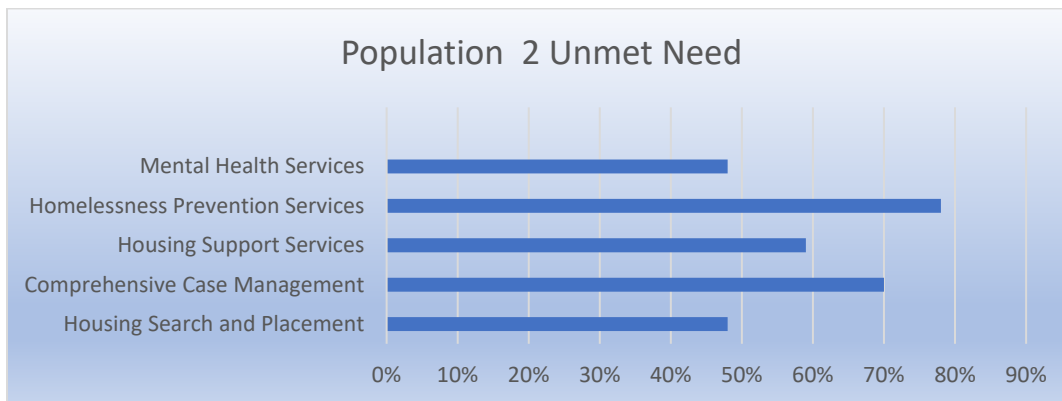
In follow-up consultations, and while there were outliers, respondents consistently verified the data from the survey.

Population 2 - At Risk of Homelessness:

Based on the survey of 36 individuals, or respondents, (representing 24 providers), 83% named permanent supportive housing and 86% named rent subsidized affordable as “high” unmet housing needs.

With regard to unmet service needs for this population, the most frequent choices from survey respondents were –

- Homelessness prevention services, including rent/utility subsidies in order to address short term issues, 78%;
- Comprehensive case management, 70%;
- Housing support services - regularly working on site with clients to assure long term housing stability, 59%;
- Housing search and placement (including landlord negotiation), 48%; and
- Mental health services, 48%.



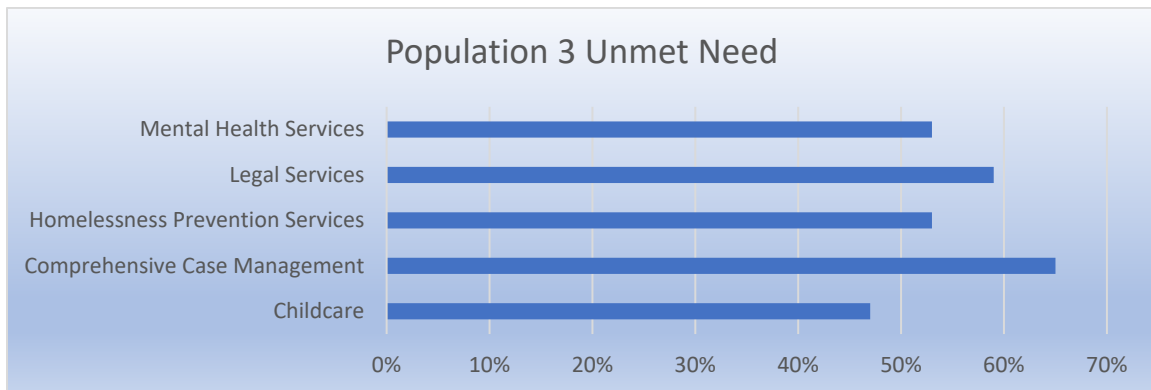
In follow-up consultations, while there were outliers, respondents consistently verified the data from the survey.

Population 3 - Persons fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

Of the 36 stakeholders responding to the PJ’s HOME-ARP survey, 59% indicated that they have significant contact with this population, and unmet need for permanent supportive housing, and rent subsidized affordable housing were rated as high needs by 73% and 93% of respondents, respectively.

With regard to unmet service needs for this population, the most frequent choices from survey respondents were –

- Comprehensive case management, 65%;
- Legal services, 59%;
- Homelessness prevention services, including rent/utility subsidies in order to address short term issues, 53%;
- Mental health services, 53%;
- Child care, 47%; and
- Housing search and placement (including landlord negotiation), 47%.



In follow-up consultations, while there were outliers, respondents consistently verified the data from the survey.

Population 4 - other families requiring services or housing assistance to prevent homelessness, OR those at greatest risk of housing instability or in unstable housing situations

Generally speaking, this population does not meet any of the requirements for Populations 1 -

3. This population is either –

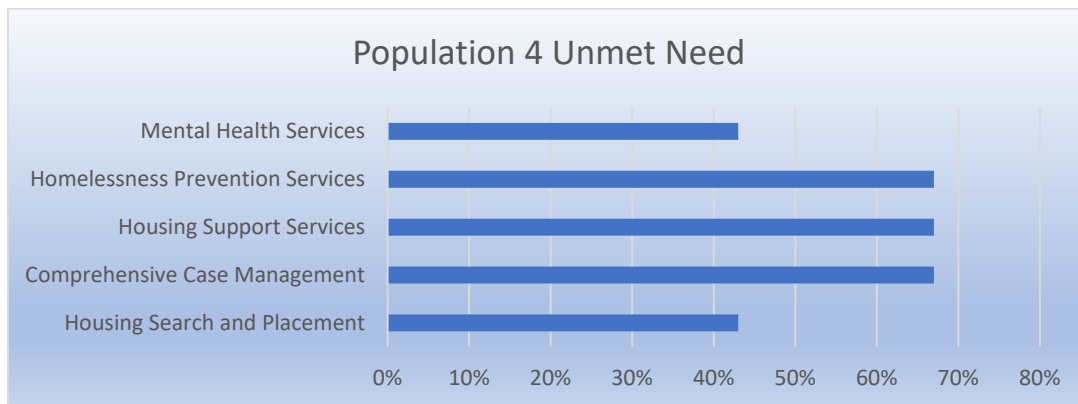
- (1) housed, but previously “homeless” (as defined for Qualifying Population 1) and requires further assistance to avoid a return to homelessness,
- (2) lives at or below 30% of AMI and pays in excess of 50% of household income toward housing, OR

(3) lives at or below 50% of the AMI and meets any one of 7 risk factors.

Of the 36 stakeholders responding to the PJ's HOME-ARP survey, 72% indicated that they have significant contact with this population, and unmet need for permanent supportive housing, and rent subsidized affordable housing were rated as high needs by 63% and 80% of respondents, respectively.

With regard to unmet service needs for this population, the most frequent choices from survey respondents were –

- Homelessness prevention services, including rent/utility subsidies in order to address short term issues, 67%;
- Comprehensive case management, 67%;
- Housing support services - working on site with clients or as necessary to assure long term housing stability, 67%;
- Housing search and placement (including landlord negotiation), 43%; and
- Mental health services, 43%.



In follow-up consultations, and while there were outliers, respondents consistently verified the data from the survey.

Veterans – Veterans and families that include a veteran family member that meet one of the preceding criteria.

While Veterans are named in the Notice, they must also meet one of the four (4) requirements to be eligible for HOME-ARP benefits. Therefore numbers and demographics are approximately the same, except that, based on consultations.

Public Participation

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

The Kane - Elgin HOME Consortium will provide citizens with a reasonable opportunity to comment on the HOME-ARP Allocation plan, and will make both this plan and any amendments available for public review. Upon request, this plan will be made available in a format accessible to persons with disabilities or in other languages.

The Kane - Elgin HOME Consortium HOME-American Rescue Plan (ARP) Allocation Plan will be made available online at www.countyofkane.org/Pages/ocr.aspx for public comment from January 8th, 2023 through February 7th, 2023.

Kane County will distribute the HOME-American Rescue Plan (ARP) Allocation Plan via various e-mail distribution groups from county offices that include municipalities, service providers, school districts, hospitals, faith based organizations, and local stakeholders.

A public hearing will be held on virtually on January 30th from 10 am – 11 am as well as on February 1st from 2pm to 3pm. The invitation link can be found online or via e-mail distribution groups.

January 30th 10am – 11 am:

<https://us02web.zoom.us/j/86745861676?pwd=aWFPUDZWN004OUpZTnhFbmdBd0NWUT09>

February 1st 2pm – 3pm:

<https://us02web.zoom.us/j/85647508003?pwd=TIFCR3dPRkQ5SFZWUmZSU1N0Q2Q3QT09>

Along with posting the details of the comment period and public hearing on Kane County and the City of Elgin's website the Kane - Elgin HOME Consortium will also publish the comment period and public hearing details in the Daily Herald.

Describe the public participation process:

Kane - Elgin HOME Consortium will distribute the draft plan to various email distribution groups and will post the document on Kane County's and the City of Elgin's web page on January 6th, additionally the county and city will post the like to the web page on social media accounts. The public will have 30

							1 child)							
Emergency Shelter	55	15	82	1	0	71 (52%)								
Transitional Housing	8	2	10	1	0	16 (89%)								
Permanent Supportive Housing	15	5	61	20	0	74 (97%)								
Other Permanent Housing	0	0	0	0	0	n/a								
Sheltered Homeless							46	158	0	0				
Unsheltered Homeless							0	36	0	0				
Current Gap											131	49	229	229

Footnotes:

1. Kane CoC 2022 Point in Time Count (PIT);
2. Kane 2022 Continuum of Care Housing Inventory Count (HIC);
3. Survey, Coordinated Entry Data, Kane CoC, Kane CoC HMIS, Consultation
4. Kane County, less Aurora, comprises approximately 62.5% of the Kane County population as a whole. So the “Homeless Populations” are estimated to be 62.5% of the CoC population.

Housing Needs Inventory and Gap Analysis Table

Non-Homeless Estimates - Kane County, excluding Aurora			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	25,974 ⁽¹⁾		
Rental Units Affordable to 3 person HH at 30% AMI/MFI (At-Risk of Homelessness)	4,364 ⁽²⁾		
Rental Units Affordable to HH at 50% AMI/MFI (Other Populations)	6,960 ⁽³⁾		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		1,488	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		1,328	
Current Gaps			2,816

Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

Footnotes

1. 2019 ACS Data for Kane County, less Aurora. Note that this number may be slightly higher because, in addition to Kane County, Aurora also includes parts of DuPage, Kendall and Will Counties. Also of note, Aurora data was less complete than Kane County data, so assumptions were made for Aurora on rent amounts paid based on amounts paid in Kane County as a whole.
2. Average 2019 ACS Kane County HH is 2.67 persons. Based on FY 2021 Section 8 tables, a 3 person household in Kane County living at 30% AMI can afford a gross rent (rent + utilities) of \$630 per month (30% of 25,200 annually), and 4,364 units are available to households with rents less than or equal to \$630 per month.
3. Average 2019 ACS Kane County HH is 2.67 persons. Based on FY 2021 Section 8 tables, a 3 person household in Kane County living at 50% AMI can afford a gross rent (rent + utilities) of \$1049 per month (30% of \$41,950 annually), and 6,960 units are available to households with rents from \$630 to \$1049 per month.

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

Demographic Composition

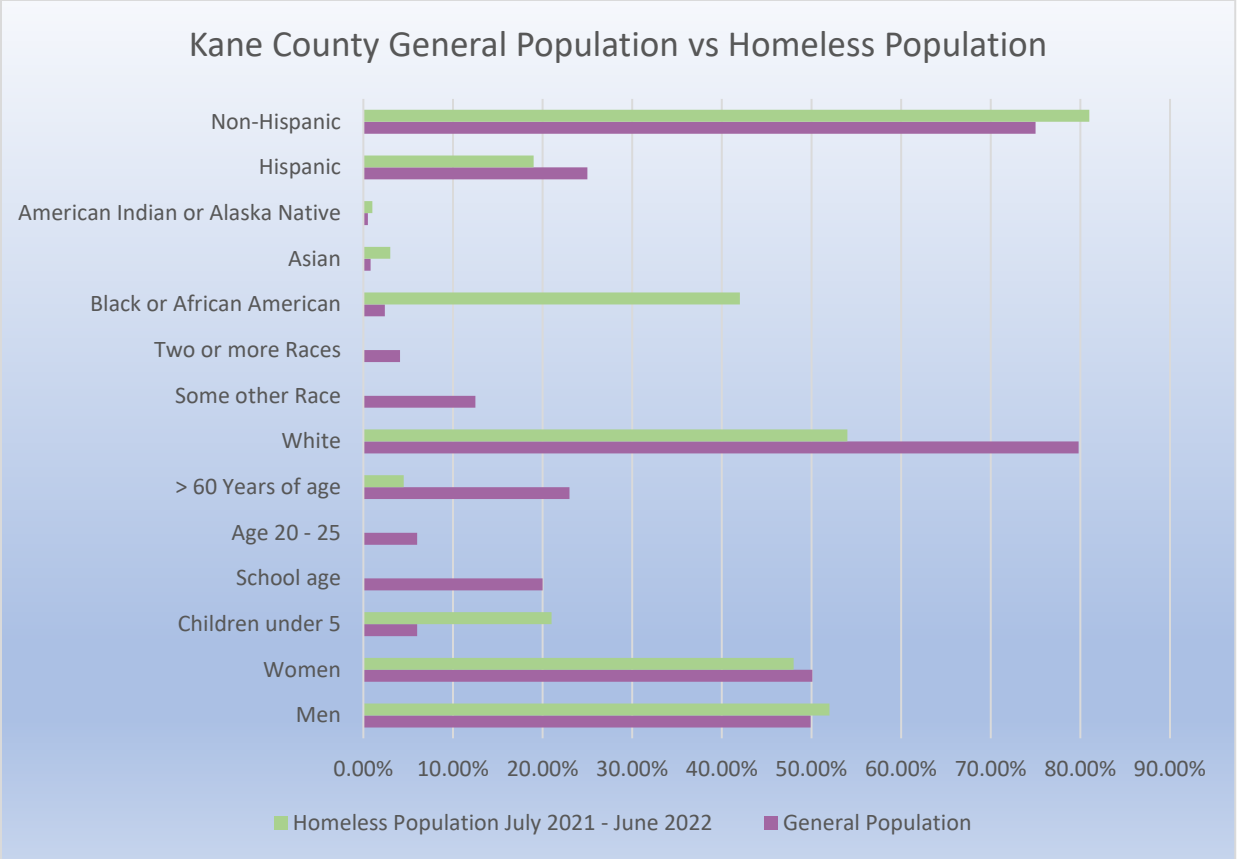
As detailed earlier in this plan, a consensus of agencies participating in consultations indicated that the populations served were reasonably proportionate to the demographic composition of the Kane - Elgin HOME Consortium as a whole. The exception, based on consultation with providers, is that most Veterans are men.

The following is a summary of the estimated demographic composition of the PJ as a whole and, as noted above, of qualifying populations.

Data Comparison – 2020 American Community Survey (ACS), 5 Year Estimates for the Kane PJ vs Kane CoC Coordinated Entry (CE) and Point in Time (PIT) Data			
	<u>ACS Data:</u>	<u>Kane CoC CE Data, July 2021 - June 2022</u>	<u>Kane CoC PIT Homeless Data, January 2022</u>
Total Population for Kane County, including the Aurora PJ	531,756	-	-
Kane PJ, does not include Aurora (62.5% of 531,756)	332,348	-	-
Men	49.9%	52%	66%

Women	50.1%	48%	34%
Children under 5	6%	21%	13% (Literally Homeless. This number is much higher by programs other than HUD)
School age	20%		
Age 20 - 25	6%	-	8%
> 60 Years of age	23%	4.5%	Included in other categories
White	79.8%	54%	60%
Some other Race	12.5%	Included in other categories	Included in other categories
Two or more Races	4.1%		6%
Black or African American	2.4%	42%	31%
Asian	0.8%	3%	2%
American Indian or Alaska Native	0.5%	1%	1%
Hispanic	25%	19%	31%
Non-Hispanic	75%	81%	69%
Disabling Condition	-	49%	-
Domestic Violence	-	37%	-
Veterans	4%	4.5%	-

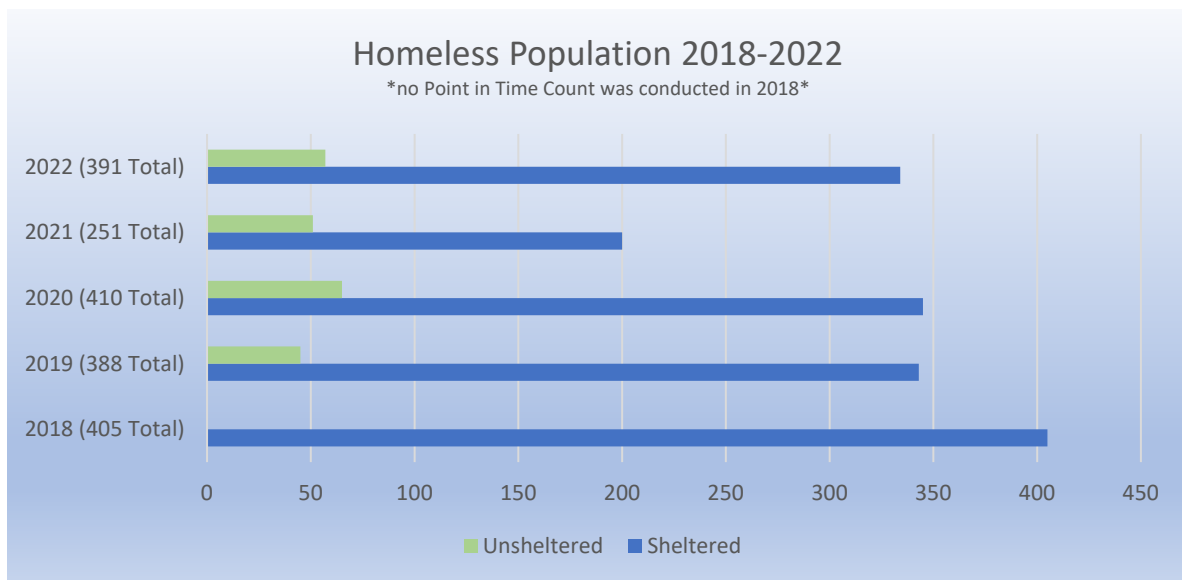
2020 American Community Survey (ACS), 5 Year Estimates for the Kane PJ. The Kane PJ includes Kane County, less the City of Aurora. This demographic data is an estimate and was derived by subtracting City of Aurora estimates from Kane County estimates. It should be noted also that while largely in Kane County, portions of Aurora's populations are also included in DuPage, Kendall and Will county estimates. As a result, the Kane PJ population estimate (total number of 332,430) should be slightly higher.



Estimated Size of Qualifying Populations within the PJ

Size of Qualifying Population 1 – **Homeless as defined in 24 CFR 91.5**

The current estimated size of this population within the Kane CoC is 51 families (136 persons in families) and 241 single heads of household; a total of 292 families or households consisting of 377 persons. The Kane - Elgin HOME Consortium area population is approximately 62.5% of the Kane CoC. Therefore, the current estimated size of the Kane - Elgin HOME Consortium is **183 families or households** consisting of **236 persons**. The Kane - Elgin HOME Consortium utilized Kane CoC point in time (PIT) and housing inventory count (HIC) data to make the determination of the size of this qualifying population. This information is included in the Homeless Needs Inventory and Gap Analysis Table shown previously in this plan.



Size of Qualifying Population 2 – *At Risk of Homelessness as defined in 24 CFR 91.5*

Generally speaking, this population is (1) housed but due to lack of resources for housing is at extreme risk for becoming homeless (2) due to any one of a number of risk factors, and (3) lives at or below 30% AMI, the poverty line.

Of the 36 stakeholders responding to the Kane - Elgin HOME Consortium’s HOME-ARP survey, 93% indicated that they have significant contact with this population, and unmet need for permanent supportive housing, and rent subsidized affordable housing were rated as high needs by 86% and 83% of respondents, respectively. In follow-up consultations, and while there were outliers, respondents consistently verified the data from the survey.

Data from the American Community Survey (ACS 2019 Data, Table DP04) estimates that there are 25,611 households paying rent in the Kane - Elgin HOME Consortium area. Of this number 52%, or 13,282 households pay rent in excess of 30% of their household income toward gross rent (rent + utilities). The average household size is 2.67 persons.

ACS 2020 Data, Table DP03 shows that of 116,717 Kane - Elgin HOME Consortium households, 11.2% have an income of less than \$25,000. The 2021 HUD 30% AMI for a 3 person household in the Kane - Elgin HOME Consortium (the Chicago MSA) is \$25,200.

Insofar as determining the size of this population, we estimate that of the 13,282 Kane - Elgin HOME Consortium households paying in excess of 30% of their income for housing, at least 11.2% of those same renters have an average household size for the Kane - Elgin HOME Consortium and are living in poverty. Therefore the estimated size of this group is (13,282 Kane PJ households x 11.2% living in poverty) = **1,488 households**, or (1,488 x 2.67 persons per household) **3,973 persons**.

Size of Qualifying Population 3 – *Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice*

The number of individuals enrolled in domestic violence shelter per the 2021 HUD Housing Inventory Count (HIC) for the Kane CoC is 25. Since the Kane - Elgin HOME Consortium makes up 62.5% of the Kane CoC, an estimated (62.5% x 25) 16 persons are attributed to the Kane PJ. Based on consultation with domestic violence providers, this population consists largely of single individuals (women). Since domestic violence is known to fragment families, children are often reunited with their mothers once permanently housed. Therefore this population in the Kane - Elgin HOME Consortium is estimated to be 10 individuals, plus 6 families @ 2.67 persons per household, or a total of 16 households consisting of 26 persons.

But since beds dedicated to domestic violence victims and survivors are limited in the Kane - Elgin HOME Consortium, many seek or are referred for assistance to other providers through the Kane CoC Coordinated Entry (CE) system. In the most recent fiscal year, and of those reporting, 37% of the estimated 575 individuals or families, a total of 212 report, that they are currently or have been victims of domestic violence. Adjusted for the Kane - Elgin HOME Consortium at 62.5%, this points to a need for housing for 106 individuals and 32 families (representing 86 persons), a total of 192 persons within 138 households.

This number is estimated to be 20% higher to accommodate for (1) persons not reporting, (2) a large number of persons turned away (236 individuals or families) from dedicated DV beds in the past reporting year by Mutual Ground (the regional DV shelter provider in a nearby city), and (2) additional persons who are victims of dating violence, sexual assault, stalking or human trafficking. Therefore, the total need is estimated at 117 individuals and 35 families (**293 persons total**), to serve a total of **166 households**.

Size of Qualifying Population 4 – *Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice*

Generally speaking, this population does not meet any of the requirements for Populations 1 - 3. This population is (1) housed, but previously “homeless” (as defined for Qualifying Population 1) and requires further assistance to avoid a return to homelessness, (2) lives at or below 30% of AMI and pays in excess of 50% of household income toward housing, or (3) lives at or below 50% of the AMI and meets any one of a number of risk factors.

Of the 36 stakeholders responding to the Kane - Elgin HOME Consortium’s HOME-ARP survey, 72% indicated that they have significant contact with this population, and unmet need for permanent supportive housing, and rent subsidized affordable housing were rated as high needs by 63% and 80% of respondents, respectively. In follow-up consultations, and while there were outliers, respondents consistently verified the data from the survey.

Data from the American Community Survey (ACS 2019 Data, Table DP04) estimates that there are 25,611 households paying rent in the Kane - Elgin HOME Consortium. Of this number 52%, or 13,282 households pay rent in excess of 30% of their household income toward gross rent (rent + utilities). The average household size is 2.67 persons.

ACS 2020 Data, Table DP03 shows that of 116,717 estimated Kane - Elgin HOME Consortium households, 11,638, or 10% are estimated to have an income between \$25,000 and \$42,000. The 2021 HUD 30% - 50% AMI for a 3-person household in the PJ (the Chicago MSA) is between \$25,200 and \$41,950.

Insofar as determining the size of this population, we estimate that of the 11,638 Kane - Elgin HOME Consortium households with an income between \$25,000 and \$42,000, at least 10% of those same renters are paying between 30 - 50% AMI for gross rent. Therefore the estimated size of this group is (13,282 Kane PJ households x 10% paying between 30% - 50% of AMI) = **1,328 households**, or (1,328 x 2.67 persons per household) **3,546 persons**.

It should be noted that households with a gross household income at or below 30% of AMI may also meet definitions for this population but are excluded from this estimate because households living at or below 30% of AMI have already been considered as a part of Population 2.

Veterans – Veterans and families that include a veteran family member that meet one of the preceding criteria.

While Veterans are named in the Notice, they must also meet one of the four (4) populations to be eligible for HOME-ARP benefits. Based on ACS data, 4% of Kane County's population consists of Veterans. Data from the Kane CoC Coordinated Entry system shows that of those seeking assistance in the most recent fiscal year, 4.5% were Veterans. Therefore numbers and demographics are approximately the same, except that, based on consultations, Veteran populations are predominantly men.

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

Current Resources and Considerations - Congregate and Non-Congregate Shelter Units

Based on the Kane CoC's 2021 housing inventory count (HIC), there are 267 congregate and non-congregate shelter units serving Kane County. The Kane - Elgin HOME Consortium's population is approximately 62.5% of the Kane CoC. Therefore, the number of congregate and non-congregate shelter units is 183 units.

Based on the survey and in consultation with Kane - Elgin HOME Consortium stakeholders, and while the development of new shelter and non-congregate shelter resources are needed and would be welcome to all stakeholders, access to truly affordable rental housing (rent subsidies or rents at or below 30% of monthly household income) for households from 0% to 50% of AMI is the highest need within the Kane - Elgin HOME Consortium.

Insofar as unmet need for shelter is concerned, and as demonstrated during the height of the COVID pandemic, shelter resources can be expanded (congregate and/or non-congregate) by use of temporary facilities or by the provision of hotel/motel vouchers when needed.

Current Resources and Considerations - Supportive Services

Generally and program wide, the prevalent HUD strategy for the provision of supportive services necessary for households to remain stably housed is to obtain necessary support from the mainstream. Survey respondents and others in consultation with the Kane - Elgin HOME Consortium were asked to consider the adequacy of supportive services throughout the Kane - Elgin HOME Consortium and to identify gaps in services. This same group was also asked to identify disparities due to age (elderly, youth, etc.), race, ethnicity, LGBTQ+, disability, etc.

While services are almost never adequate to serve all needs, there were fewer mentions of unmet need for homeless coordinated entry and referral, homeless outreach, Veterans services, outpatient health, legal, life skills, education, and employment services. There were also fewer mentions of unmet need for child care, benefits specialists, and others.

But stakeholders identified other service needs as more significant. A summary follows:

1. Homelessness Prevention Services (Populations 2 and 4) to work with unstably housed clients to develop long term strategies to address short term (less than 2 years) housing instability. Includes help with utility and/or rent arrearages, short term rental assistance, housing placement services (if necessary), connection to mainstream services, etc.
2. Comprehensive Case Management, meaning to work directly with clients to assess needs, housing and service planning and monitoring, in order to establish a path to stable permanent housing. This work also includes counseling, assessing benefit eligibility from outside agencies, making necessary referrals for housing and/or services, utilizing CoC coordinated assessment and/or risk assessment, safety planning with victims of domestic violence, dating violence, sexual assault, and/or stalking, etc.
3. Housing Search and Placement, or the need for specialized help for clients to locate, negotiate with landlords, secure and maintain affordable, stable rental housing. This is most often due to client barriers or issues associated with disabilities (autism, MHSA, etc.), real or perceived discrimination (youth, seniors, ethnicity, race, LGBTQ+, etc.), language or education barriers, difficulty in navigating eligibility or application requirements, etc. Other factors include working to establish beneficial relationships with landlords who are reluctant to or unwilling to participate in rental assistance

programs, as well as to identify available rental housing in a market with a very low vacancy rate.

4. Mental Health and Substance Abuse, and Transportation service gaps are prevalent in all qualifying populations.

Current Resources and Considerations - Tenant Based Rental Assistance (TBRA)

TBRA is flexible and is often used in permanent supportive housing programs. As demonstrated in the HUD CoC and VA VASH programs, TBRA (scattered site or clustered), when combined with services that are both voluntary and appropriate to meet the needs of each individual household, has been proven to be a successful model for “permanent supportive housing.”

Based on the 2021 Kane CoC homeless needs inventory, there are 143 units of permanent supportive housing. Many of these units are funded either through CoC or HUD VASH TBRA. Since the Kane - Elgin HOME Consortium encompasses 62.5% of the Kane - Elgin HOME Consortium, current resources are adjusted to 89 units. Since the turnover rate is very low for these units, there is virtually no availability. And availability is further limited because significant access (CoC for literally homeless and VASH for Veterans) is almost exclusively limited to Population 1 (homeless by HUD and/or VA rule).

There are no known TBRA resources currently available for Populations 2, 3 and 4. The Housing Authority of Elgin, IL serves communities throughout the Kane - Elgin HOME Consortium. Based on information on their website (haelgin.org), the HCVP waiting list is closed. Of note, the Aurora Housing Authority does not serve areas outside of the corporate limits of Aurora.

TBRA is a powerful tool for solving housing affordability issues for all qualified populations. The first advantage of TBRA is that programs can be designed and implemented relatively quickly. Since many within Qualifying Populations 2, 3 and 4 are not literally homeless, and thus, may not require newly identified units in order to stabilize their housing, the scarcity of affordable units in the marketplace (public or private) is not as problematic. In fact, for many residents, a move would only exacerbate ongoing instability. Only TBRA is needed. And even in a market with very limited rental housing availability, TBRA vouchers, coupled with placement services, will make units out of financial reach absent TBRA available to qualified populations.

Current Resources and Considerations - Affordable Rental Housing

With very little exception, Qualified Populations 1, 2, 3 and 4 with an average household size of 3 will have an income between \$0 and \$41,950. This means that in order to access housing within 30% of the monthly income of almost every qualifying family of 3, the gross rent (rent + utilities) would need to be between \$0 and \$1049 per month. Based on Census data, the 2016 - 2020 Median Gross Rent (rent + utilities) for Kane County is \$1,187. And this number predates today's inflationary market for rental housing.

A quick web search of Kane County rental availability on May 12, 2022 yielded the following result:

- The web site for the Housing Authority of Elgin (serving Kane County) messages that the “Affordable Housing Waitlist is Closed;”
- The web site for the Housing Authority of Elgin contains a link for renters to search for housing on AffordableHousing.Com. This site lists 8 rentals in Kane County that may be suitable for a 3-person household (2 BR 1 BA apartments). One lists at \$1025 and one lists at \$1100, and the other 6 range from \$1175 to \$1490. There is almost no chance that, with the addition of utility costs, any of these units would be available to qualified populations at 30% of monthly income; and
- Zillow lists 34 houses for rent. With the exception of a single room for rent at \$550, contract rents (not including utilities) range from \$1450 to \$3495 per month.
- 22 property management organizations with a total of 5318 units in Kane County from October 22 – 12/22 were surveyed to assess the availability of affordable units. This survey found that that current vacancy rate for affordable units in Kane County is .63%.

In conclusion, there is very little, if any, availability in market rate or rent subsidized affordable housing in Kane County for HOME-ARP qualified populations. This conclusion is consistent with the information gained from a consensus of respondents to the survey, as well as from key stakeholders who participated in consultation with the Kane - Elgin HOME Consortium.

Current Resources and Considerations - Permanent Supportive Rental Housing (PSH)

In the Kane CoC, there are 127 units of permanent supportive housing serving 189 formerly homeless persons. Since the Kane - Elgin HOME Consortium is 62.5% of the CoC, numbers attributed to the Kane - Elgin HOME Consortium total 79 units housing 118 persons. Most of those served are single and were homeless for longer and more frequent periods of time. All have disabling conditions. And all persons served in CoC permanent supportive rental housing meet Population 1 eligibility, having entered as homeless from streets or shelter with a disabling condition (mental health is primary). These persons most often also entered meeting other special conditions for entry such as (1) chronic homelessness, or (2) entering from transitional housing but arriving there from streets or shelter.

Generally speaking, there is little or no supply of permanent supportive rental housing in the Kane - Elgin HOME Consortium for Populations 2, 3 and 4. However, based on the Kane - Elgin HOME Consortium’s survey and stakeholder consultation input, the need is clearly apparent for all four populations.

Population	High Need for PSH	Unmet Need for Mental Health Services ¹	Unmet Need for Housing Support Services ¹
Population 1	73% of respondents serving this population	52% of respondents	60% of respondents
Population 2	86%	48%	59%

Population 3	73%	53%	41% ²
Population 4	63%	43%	67% ³

¹ Generally, and particularly through the first few years of stable residency, ongoing mental health and housing support services are needed for clients in permanent supportive rental housing

² Domestic violence service providers typically have more resources for client services.

³ The need for housing support services for this population points to a critical need for Population 4 in order to stabilize their housing situation

For Population 1, the only PSH availability results from units that become vacant, and the vacancy rate is low because a vacancy typically occurs most often when there is a negative outcome. PSH success is measured by a high rate of retention.

Describe the unmet housing and service needs of qualifying populations:

Qualifying Population 1 – Homeless as defined in 24 CFR 91.5

Population 1 Unmet Housing Needs

As previously discussed in this plan, the survey of 36 individuals, or respondents, (representing 24 providers), 73% named permanent supportive housing and 53% named rent subsidized affordable as a “high” unmet housing needs. Further, and as discussed in the previous section, the current estimated size of this population in the Kane CoC is 292 households.

The Kane - Elgin HOME Consortium’s population is approximately 62.5% of the Kane CoC. Therefore, the current unmet housing need is for a total of 183 rent subsidized permanent housing units (project based or scattered site). Based upon the typical needs of this population, an estimated 75% of the need is for supportive housing, and 25% of the need is for affordable (no site based supportive services) housing.

Population 1 Unmet Service Needs

As previously discussed in this plan, the most frequent unmet service needs for this population based on survey respondents were –

- Housing search and placement (including landlord negotiation), 73% of respondents;
- Comprehensive case management, 68%;
- Housing support services - regularly working on site with clients to assure long term housing stability, 60%;

- Homelessness prevention services, including rent/utility subsidies in order to address short term issues, 52%;
- Mental health services, 52%; and
- Transportation services, 48%.

Additional Information: Population 1 Unmet Housing and Service Needs of the Kane CoC

Both the Kane - Elgin HOME Consortium and Kane CoC are administered by the Kane County Office of Community Reinvestment, and in 2020, the Kane CoC conducted a needs assessment as a part of their ongoing planning process. Much of this information is relative to HUD-ARP ***Homeless as defined in 24 CFR 91.5*** and many of the needs identified in the CoC's 2020 plan are consistent with the findings herein.

The following were identified in 2020 to be key factors among CoC homeless providers, and stand out as consistent with the survey and consultation findings of the Kane - Elgin HOME Consortium associated with HOME-ARP program –

1. Disabling conditions associated with mental health, substance abuse, chronic and/or physical health are prevalent and contribute strongly to the needs within qualifying populations. Developmental disabilities are also prevalent;
2. The need for truly affordable housing and permanent supportive housing far exceeds the supply. The 2020 CoC Needs assessment indicates that most who need ongoing rental assistance and/or services are forced to pay rents that lead to immediate instability due to severe cost burden. Thus these families become a part of Populations 2 and 4; and
3. The lack of adequate public transportation was cited as a critical need in the CoC assessment as well as a high need identified by HOME-ARP stakeholders.

Qualifying Population 2 – ***At Risk of Homelessness as defined in 24 CFR 91.5***

Population 2 Unmet Housing Needs

As previously discussed in this plan, the survey of 36 individuals, or respondents, (representing 24 providers), 83% named permanent supportive housing and 86% named rent subsidized affordable as “high” unmet housing needs.

Further, and as discussed in the response to a previous question, the current estimated size of this population in the Kane - Elgin HOME Consortium is 1,488 households.

Therefore, the unmet housing need is for a total of 1,488 rent subsidized permanent housing units (project based or scattered site). Based upon the typical needs of this population, an estimated 25% of the need is for supportive housing, and 75% of the need is for affordable (no site based supportive services) housing.

Population 2 Unmet Service Needs

With regard to unmet service needs for this population, the most frequent choices from survey respondents were –

- Homelessness prevention services, including rent/utility subsidies in order to address short term issues, 78%;
- Comprehensive case management, 70%;
- Housing support services - regularly working on site with clients to assure long term housing stability, 59%;
- Housing search and placement (including landlord negotiation), 48%; and
- Mental health services, 48%.

Qualifying Population 3 – *Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice*

Population 3 Unmet Housing Needs

Of the 36 stakeholders responding to the Kane - Elgin HOME Consortium's HOME-ARP survey, 59% indicated that they have significant contact with this population, and unmet need for permanent supportive housing, and rent subsidized affordable housing were rated as high needs by 73% and 93% of respondents, respectively.

The number of individuals enrolled in domestic violence shelter per the 2021 HUD Housing Inventory Count (HIC) for the Kane CoC is 25. Since the Kane - Elgin HOME Consortium makes up 62.5% of the Kane CoC, an estimated (62.5% x 25) 16 persons are attributed to the Kane PJ.

Based on consultation with domestic violence providers, this population consists largely of single individuals (women). Since domestic violence is known to fragment families, children are often reunited with their mothers once permanently housed. Therefore this population in the Kane - Elgin HOME Consortium is estimated to be 10 individuals, plus 6 families @ 2.67 persons per household, or a total of 16 households consisting of 26 persons.

Population 3 Unmet Service Needs

With regard to unmet service needs for this population, the most frequent choices from survey respondents were –

- Comprehensive case management, 65%;
- Legal services, 59%;
- Homelessness prevention services, including rent/utility subsidies in order to address short term issues, 53%;
- Mental health services, 53%;
- Child care, 47%; and

- Housing search and placement (including landlord negotiation), 47%.

Qualifying Population 4 – Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

Population 4 Unmet Housing Needs

Generally speaking, this population does not meet any of the requirements for Populations 1 - 3. This population is either –

- (1) housed, but previously “homeless” (as defined for Qualifying Population 1) and requires further assistance to avoid a return to homelessness,
- (2) lives at or below 30% of AMI and pays in excess of 50% of household income toward housing, OR
- (3) lives at or below 50% of the AMI and meets any one of 7 risk factors.

Of the 36 stakeholders responding to the Kane - Elgin HOME Consortium’s HOME-ARP survey, 72% indicated that they have significant contact with this population, and unmet need for permanent supportive housing, and rent subsidized affordable housing were rated as high needs by 63% and 80% of respondents, respectively. In follow-up consultations, and while there were outliers, respondents consistently verified the data from the survey.

Data from the American Community Survey (ACS 2019 Data, Table DP04) estimates that there are 25,611 households paying rent in the Kane - Elgin HOME Consortium. Of this number 52%, or 13,282 households pay rent in excess of 30% of their household income toward gross rent (rent + utilities). The average household size is 2.67 persons.

ACS 2020 Data, Table DP03 shows that of 116,717 estimated Kane - Elgin HOME Consortium households, 11,638, or 10% are estimated to have an income between \$25,000 and \$42,000. The 2021 HUD 30% - 50% AMI for a 3-person household in the Kane - Elgin HOME Consortium (the Chicago MSA) is between \$25,200 and \$41,950.

Insofar as determining the size of this population, we estimate that of the 11,638 Kane - Elgin HOME Consortium households with an income between \$25,000 and \$42,000, at least 10% of those same renters are paying between 30 - 50% AMI for gross rent (those at or below 30% AMI have been assessed as a part of Population 2). Therefore the estimated size of this group is (13,282 Kane PJ households x 10% paying between 30% - 50% of AMI) = 1,328 households, or (1,328 x 2.67 persons per household) 3,546 persons.

Population 4 Unmet Service Needs

With regard to unmet service needs for this population, the most frequent choices from survey respondents were –

- Homelessness prevention services, including rent/utility subsidies in order to address short term issues, 67%;
- Comprehensive case management, 67%;
- Housing support services - working on site with clients or as necessary to assure long term housing stability, 67%;
- Housing search and placement (including landlord negotiation), 43%; and
- Mental health services, 43%.

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

Shelter and Housing Inventory

Based on the survey, and as indicated by stakeholders in consultations with the Kane - Elgin HOME Consortium, of respondents who indicate that they have “significant and direct contact with clients who are homeless, meaning that they are living on streets, in emergency shelters, or within 14 days of eviction with no resources for housing” (Population 1), only 8% rated shelter (congregate, non-congregate, overflow, hotel/motel vouchers, etc.) as a “High” unmet need. A significant majority of these same respondents, 73%, rated permanent supportive housing as the highest unmet need among this population.

The most significant take-away from survey and in-person stakeholder consultation is that, while the development of new shelter and non-congregate shelter resources are needed and would be welcome to all stakeholders, shelter resources can be expanded (congregate and/or non-congregate) by use of temporary facilities or by the provision of hotel/motel vouchers when needed. Today’s best practice is to seek to limit shelter stays to the shortest possible time necessary, if not to completely eliminate shelter stays altogether, in favor of a “housing first” strategy.

The largest gap in inventory is for permanent affordable housing for persons between 0% and 50% of AMI. As shown in the “Non-Homeless Estimates” table, the gap in rental housing affordable for households between 0% and 30% AMI is 1,488 units and the gap in rental housing affordable for households between 30% and 50% AMI is 1,328 units, a total of 2,816 units.

Service Delivery System

In person consultation with stakeholders points to the need for HOME-ARP service funding only in situations where services cannot be obtained for housing support from other sources. Gaps in services that contribute to housing instability within the Kane - Elgin HOME Consortium are as follows:

1. Homelessness Prevention Services to work with unstably housed clients to develop long term strategies to address short term (less than 2 years) housing instability. Includes

help with utility and/or rent arrearages, short term rental assistance, housing placement services (if necessary), connection to mainstream services, etc.

2. Comprehensive Case Management, meaning to work directly with clients to assess needs, housing and service planning and monitoring, in order to establish a path to stable permanent housing. This work also includes counseling, assessing benefit eligibility from outside agencies, making necessary referrals for housing and/or services, utilizing CoC coordinated assessment and/or risk assessment, safety planning with victims of domestic violence, dating violence, sexual assault, and/or stalking, etc.
3. Housing Search and Placement, or the need for specialized help for clients to locate, negotiate with landlords, secure and maintain affordable, stable rental housing. This is most often due to client barriers or issues associated with disabilities (autism, MHSA, etc.), real or perceived discrimination (youth, seniors, ethnicity, race, LGBTQ+, etc.), language or education barriers, difficulty in navigating eligibility or application requirements, etc. Other factors include working to establish beneficial relationships with landlords who are reluctant to or unwilling to participate in rental assistance programs, as well as to identify available rental housing in a market with a very low vacancy rate.
4. Mental Health and Substance Abuse, and Transportation service gaps are prevalent in all qualifying populations.

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

Of the 36 stakeholders responding to the Kane - Elgin HOME Consortium’s HOME-ARP survey, 72% indicated that they have significant contact with individuals and families who meet this criterion (Population 4) and are seeking assistance to stabilize their housing situation.

With regard to unmet service needs for this population, the most frequent choices from survey respondents were –

- Homelessness prevention services, including rent/utility subsidies in order to address short term issues, 67%;

- Comprehensive case management, 67%;
- Housing support services - working on site with clients or as necessary to assure long term housing stability, 67%;
- Housing search and placement (including landlord negotiation), 43%; and
- Mental health services, 43%.

Based on input from stakeholders completing surveys and participating in consultation with the Kane - Elgin HOME Consortium, many of their clients have qualified and received, or are currently receiving, temporary or short term rental assistance payments through ESG, CoC, or DHS HP programs.

While previous rental support may have prevented some returns to homelessness, many current Rapid Rehousing and PSH clients may likely return to homelessness upon program exit. Furthermore, the Housing Authority of Elgin's Public Housing and HCVP waitlists have been closed for multiple years and remain unlikely to reopen in the near future. Historically low rental unit vacancies, landlord burnout, increased income requirements, and rental increases have created a climate that is increasingly unfriendly to households with lower incomes thereby necessitating some rental assistance subsidy to account for lack of fixed income.

Identify priority needs for qualifying populations:

The overwhelming majority of stakeholders participating in the Kane - Elgin HOME Consortium's survey and consultation process identified rent subsidized affordable housing and permanent supportive housing as the highest priority unmet needs for all qualifying populations.

The highest mentions of priority service needs for all populations include homelessness prevention, housing search and placement, case management, housing support services, and mental health services.

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

The needs and gaps in shelter and associated services were identified through the Kane County CoC's Housing Inventory Count (HIC), Point in Time (PIT) counts, stakeholder feedback, McKinney Vento Student data, and domestic violence data collected from DV shelters. While those who are literally homeless have adequate access to emergency shelter and HUD funded housing programs, hundreds, if not thousands of households remain unable to access any type of programming due to eligibility criteria. Additionally, the two primary DV shelters in the

County reported turning away hundreds of households annually due to lack of shelter space and resources.

Needs and gaps in housing inventory were identified based on an examination of American Community Survey data on housing and income characteristics of Kane County, IL, after subtracting data from the City of Aurora (the Aurora PJ). The balance reflects an estimate of the Kane - Elgin HOME Consortium.

HOME-ARP Activities

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

NA

Describe whether the PJ will administer eligible activities directly:

Kane County will administer all eligible activities directly thru its Office of Community Reinvestment. The Community Development Division of the Office of Community Reinvestment has staff that have both financial and case management experience to administer the proposed activities. The Office of Community Reinvestment has operated both short- and medium-term rental assistance programs such as the State of IL Homeless Prevention and rapid rehousing programs financed with Emergency Solutions Grant funds.

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

N/A

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 2,889,169	85%	
Acquisition and Development of Non-Congregate Shelters	\$		
Tenant Based Rental Assistance (TBRA)	\$		
Development of Affordable Rental Housing	\$		
Non-Profit Operating	\$	%	5%
Non-Profit Capacity Building	\$	%	5%
Administration and Planning	\$ 509,853	15%	15%
Total HOME ARP Allocation	\$ 3,399,022		

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

The overwhelming majority of stakeholders participating in the Kane - Elgin HOME Consortium's survey and consultation process identified rent subsidized affordable housing and permanent supportive housing as the highest priority unmet needs for all qualifying populations.

The highest mentions of priority service needs for all populations include homelessness prevention, housing search and placement, case management, housing support services, and mental health services. Historically many populations have been excluded from accessing these types of services in Kane County due to HUD Rules on ESG/CoC funds; and while the State of Illinois offers some Homeless Prevention dollars, agencies typically exhaust their allocation within weeks of program implementation.

Kane County will utilize 15% of its HOME ARP allocation for Administration and Planning, with the remaining \$2,889,169 going into various Supportive Service activities. The primary focus of the Supportive Services will be short/medium term rental assistance, case management, and supportive serves as outlined in the Eligible Activities of the HOME-ARP Implementation Notice. In addition to direct rental payments, the County will provide extensive and robust supportive services to households based on the clients' needs.

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

Kane County Emergency Shelter, Rapid Rehousing, Permanent Supportive Housing, and Homeless Prevention programs consistently operate at high unit utilizations. Despite operating at high utilizations, many qualified populations are waitlisted for significant periods of time or are simply not eligible to receive the types of services that are available. The Housing Authority of Elgin’s program waitlists have been closed for 3 years with staff indicating those waitlists will remain closed indefinitely. Utilizing the information above, the total estimated number of households with unmet housing needs (across QPs) is 3,165. In the County’s experience of Rental Assistance service delivery, households require on average \$1,000 a month, for at least 12, if not 24 months to achieve stability. That would put the current financial need at \$37,980,000. While the County will not be able to assist all 3,165 households, we propose to make available assistance to of individuals and families who have been historically unable to access services until they become literally homeless. These numbers not only include households experiencing homelessness or fleeing domestic violence, they also include hundreds of families identified as precariously housed by school districts and thousands of households who exceed AMI for most federal assistance programs but are severely rent burdened.

HOME-ARP Production Housing Goals

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

N/A

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

N/A

Preferences

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

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

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

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

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

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).

- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.**

For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan. Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

Template:

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

The PJ will not give any preference to any qualifying populations.

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

NA.

Referral Methods

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

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

project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

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

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

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

Template:

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

The Kane-Elgin HOME Consortium will utilize multiple referral methods for its HOME ARP program. The Consortium will adopt a "No-Wrong-Door" policy and develop a waitlist on a first-come, first-serve basis for any eligible Qualified Population seeking services. Referrals will be welcome from all social service providers, municipalities, and school districts within the Kane-Elgin HOME Consortium. Qualified Populations will also be able to submit applications on behalf of themselves directly to the Office of Community Reinvestment.

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

NA

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

NA

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

NA

Limitations in a HOME-ARP rental housing or NCS project

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

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

Template

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

Kane County does not intend to limit eligibility.

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

Not Applicable.

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

NA

HOME-ARP Refinancing Guidelines

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

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***
- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***
- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***
- ***Other requirements in the PJ's guidelines, if applicable***