



# City of Peoria 2015 Annual Action Plan

City Hall  
419 Fulton Street, Suite 300  
Peoria, IL. 61602-1217



## **Executive Summary**

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

#### **1. Introduction**

The City of Peoria is pleased to present the 2015 Annual Action Plan. The purpose of this Plan is to set forth the investment priorities of the City during its 2015 program year (January 1, 2015 to December 31, 2015). The funding of these investments is received from the United States Department of Housing and Urban Development (HUD). The City is an entitlement community with HUD and receives annual allocations from three formula grants – Community Development Block Grant (CDBG), HOME Investment Partnership Grant (HOME) and Emergency Solutions Grant (ESG). A total of \$2,176,499 comprised of the CDBG allocation (\$1,555,133), HOME allocation (\$480,361) and ESG allocation (\$141,005) will be received for program year 2015.

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

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The objectives and outcomes of this Annual Plan are those of the 2014-2018 Consolidated Plan and are attached below. The attachment shows the linkage between these objectives and outcomes and the planned 2015 projects.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Focus Area Housing Program Leverage	2014	2018	Affordable Housing	CDBG Target Area	Affordable Housing - New construction Affordable housing - Rehab of existing units	CDBG: \$256,200 HOME: \$142,361	Rental units constructed: 2 Household Housing Unit Homeowner Housing Added: 1 Household Housing Unit Homeowner Housing Rehabilitated: 1 Household Housing Unit Housing Code Enforcement/Foreclosed Property Care: 400 Household Housing Unit
2	Demolition Program	2014	2018	Non-Housing Community Development	CDBG Target Area	Clearance	CDBG: \$250,000	Buildings Demolished: 28 Buildings
3	Roof Housing Rehabilitation Program	2014	2018	Affordable Housing	CDBG Target Area	Affordable housing - Rehab of existing units	CDBG: \$224,253	Homeowner Housing Rehabilitated: 14 Household Housing Unit
4	CHDO Set Aside	2014	2018	Affordable Housing	CDBG Target Area	Affordable Housing - New construction	HOME: \$300,000	Homeowner Housing Added: 3 Household Housing Unit

### 2015 Annual Goals and Outcomes Page 1

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Public Service Set Aside	2014	2018	Non-Housing Community Development		Public Services	CDBG: \$233,269	Public service activities other than Low/Moderate Income Housing Benefit: 2000 Persons Assisted
6	Emergency Solutions Grant	2014	2018	Homeless		Homeless- Emergency Shelter Homelessness - Rapid Re-housing	ESG: \$141,005	Tenant-based rental assistance / Rapid Rehousing: 10 Households Assisted Homeless Person Overnight Shelter: 300 Persons Assisted
7	Planning / General Administration	2014	2018	Planning / General Administration			CDBG: \$291,039 HOME: \$38,000	
8	Housing Rehabilitation Delivery	2014	2018	Affordable Housing		Affordable housing - Rehab of existing units	CDBG: \$100,372	
10	ADA Ramp Program	2014	2018	Non-Housing Community Development	CDBG Target Area	Public Improvements and Infrastructure	CDBG: \$200,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2000 Persons Assisted

Table 1 – Goals Summary

## 2015 Annual Goals and Outcomes Page 2

### **3. Evaluation of past performance**

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

The overall performance and progress for the City of Peoria is good. To date, the City has not received a HUD 2014 Program Year End Review Letter. In program year 2014, HUD conducted a monitoring visit and program review of its HOME grant. As a result of the HUD monitoring visit, the City had one finding, which was that HUD's IDIS system was not consistent with local records and the written agreement with homebuyers. In response, the City amended a project's written agreement and incorporated language in its underwriting and agreement procedures that stipulates the type and customary amount of contingency funding the City will permit. As of November 2014, the City's CDBG expenditure rate is at 1.03. The expenditure rate compares the CDBG funds available to the amount of its current grant allocation. If the balance exceeds 1.5 times the annual entitlement amount then the City has failed its timeliness test of expending CDBG funds. The City is in compliance with the ESG fund commitments (180 days after the date that HUD signs the grant agreement), fund expenditures (24 months after the date the HUD signs the grant agreement) and grant percentage restrictions (7.5% for administration and 60% for shelter costs) for its 2014 ESG grant allocation. Specific activity and project accomplishments for the City's 2014 HUD grant allocations can be found in the 2014 Consolidated Annual Performance and Evaluation Report (CAPER). In 2015, the City will continue to explore additional funding opportunities and efficiencies in programming and services, with the goal of providing a better product to our citizens. We will work to remove any barriers to affordable housing and any obstacles to meeting the housing and non-housing needs for our community. The City will also continue to develop and create partnerships with other organizations and community stakeholders to better serve the low-income population in the City.

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

For the creation of the 2015 Annual Action Plan, the citizen participation process was based on the City's adopted Citizen Participation Plan. A public hearing notice was placed in the Peoria Journal Star newspaper on August 15, 2014 announcing a public hearing on September 9, 2014 to obtain citizen comments on issues related to the housing, non-housing and community development needs in the City of Peoria. A meeting with the Peoria Housing Authority was held on August 25, 2014 to obtain information regard services and the status of the housing authority. Public meetings to receive further comments were held at the Peoria Housing Authority Taft Homes and Sterling Tower on September 18, 2014, and the Neighborhood Alliance on September 15, 2014. Additionally, a public notice was placed in the Peoria Journal

Star newspaper on February 19, 2015 announcing two public hearings on March 10, 2015 and the 30-day public comment period for the draft 2015 Annual Action Plan. Furthermore, letters were mailed to local non-for profit organizations soliciting views and opinions of the housing and community development needs of the City. At the March 2015 Governing Board and General Membership meetings of the Heart of Illinois Homeless Continuum of Care, the City requested that Continuum members review the draft 2015 Annual Action Plan and provide comments to City staff. Finally, the Plan was approved by City Council on March 24, 2015.

## **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The public comments received during the citizen participation process can be viewed in the AP-12 Participation section of this Annual Action Plan.

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

The City accepted all comments received throughout the citizen participation and consultation process of the 2015 Annual Action Plan. Some of the comments received, such as rental housing property maintenance, location of public housing and the disbursement of affordable housing opportunities throughout the City are issues that extend beyond the City's authority. The City will continue to accept public input related to housing, non-housing and community needs and make referrals to other entities when appropriate.

## **7. Summary**

This 2015 Annual Action Plan includes all the requirements for the CDBG, HOME and ESG grant programs, including those for citizen participation. The citizen participation element follows a City Council approved Citizen Participation Plan. In addition, special consultations and coordination was obtained from the Heart of Illinois Homeless Continuum of Care, Peoria Housing Authority, neighborhood associations and other entities.

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

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

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	PEORIA	
CDBG Administrator		COMMUNITY DEVELOPMENT
HOPWA Administrator		
HOME Administrator		COMMUNITY DEVELOPMENT
ESG Administrator		COMMUNITY DEVELOPMENT
HOPWA-C Administrator		COMMUNITY DEVELOPMENT

**Table 1 – Responsible Agencies**

**Narrative (optional)**

The lead agency responsible for the 2015 Annual Action Plan is the City of Peoria, a State of Illinois municipality. The City’s Community Development Department, Grants Management Division is responsible for administering the Annual Action Plan. The City is not a member of a Consortium utilizing HUD funds.

The primary public and private agencies that may be utilized in implementing the Annual Action Plan activities include, but are not limited to, the City’s Community Housing Development Organizations (CHDO's), the Heart of Illinois Homeless Continuum of Care, , neighborhood associations, faith-based organizations, governmental entities, private contractors, and non-profit service and housing providers.

### **Consolidated Plan Public Contact Information**

For more information about the 2015 Annual Action Plan, please contact Kathryn Murphy, Grants Coordinator, City of Peoria, 419 Fulton Street, Room 300, Peoria, Illinois 61602-1217, call (309) 494-8607, or send an e-mail to [kmurphy@peoriagov.org](mailto:kmurphy@peoriagov.org).

## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

The City of Peoria has adopted a Citizen Participation Plan for its Consolidated Plan and Annual Action Plans that identifies when public hearings and other consultations are to take place. This Plan was used in preparing this 2015 Annual Action Plan. The Action Plan was also prepared to comply with all the consultation requirements of the CDBG, HOME and ESG programs, including consultation with the local homeless Continuum of Care.

### **Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))**

The City of Peoria has a good relationship with the Peoria Housing Authority (PHA) and other assisted housing providers. The City regularly assists the PHA in the environmental clearance process for the PHA's annual Capital Fund and other grants. The City has also used its CDBG funds to provide match for the Peoria City/County Health Department's Lead Hazard and Clear Win residential lead mitigation programs. The City also has an established relationship with Habitat for Humanity, which has served as the City's CHDO. All of these programs require considerable coordination and planning for desired outcomes to be accomplished. Processes for this coordination are well established.

Coordination between the City and private and governmental health, mental health and service agencies is primarily accomplished through the City of Peoria Human Resources Commission (HRC), the CDBG public service application process, and the City's active participation with the Heart of Illinois Homeless Continuum of Care Governing Board, Steering Committee, and General Membership. The HRC's public service application awards ranking points for collaboration and coordination, which is an item typically brought up during the HRC Clarification meeting where HRC members ask questions of public service grant applicants.

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

The City remains pleased with how services to the homeless and persons at risk of homelessness are provided in Peoria. The City is an active member of the Heart of Illinois Homeless Continuum of Care (HOIHCOC) by serving on the Continuum's Steering Committee, participating as an advisor to the Continuum's Governing Board, and as a part of the General Membership. The increased coordination and cooperation with the HOIHCOC has allowed the City to better integrate programs and services into the plans of the Continuum. The City fully supports and endorses the 10 Year Plan to End Chronic Homelessness and participated in its development.

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

A City staff member serves as a HOIHCOC Steering Committee member as well as an advisor to the Governing Board and participates in General Membership meetings. As a Steering Committee member, the City is an instrumental participant in the development of policies, procedures and performance measures for HMIS, ESG and the HOIHCOC.

To better align the consultation related to ESG funding allocations, the City Council approved the reassignment of funding recommendations to the HOIHCOC from the Human Resources Commission (HRC) – a standing City Commission. Historically, the HRC Commissioners would review, rank and make funding recommendations to the City Council for approval. That process is now the responsibility of the HOIHCOC and its Governing Board is comprised of the homeless participation requirement (homeless individual or formerly homeless individual holds a board member position for the HOIHCOC). To facilitate the funding recommendation process, the HOIHCOC submits both a collaborative/Continuum-wide application and each agency, approved for ESG funding, submits an individual application to the City. The HOIHCOC Governing Board works with its member agencies to identify service priorities, program performance measures, provider capabilities to comply with ESG regulations and opportunities to

leverage other funding. This process is very team orientated and requires communication between service providers on how to best allocate funds for the most needed services.

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

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Peoria Housing Authority
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Market Analysis Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was contacted via letter and public hearings were conducted at project sites. The City anticipates that those consulted will provide comments regarding their own areas of expertise and this will improve coordination and cooperation among the City and PHA to improve the programming and outcomes of the 2015 Annual Action Plan.

2	<b>Agency/Group/Organization</b>	HEART OF ILLINOIS CONTINUUM OF CARE
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Other government - Local Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy HOPWA Strategy Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Heart of Illinois Homeless Continuum of Care was consulted at both the General Membership and Governing Board meetings. All agencies, specifically agencies providing services in the City of Peoria, were invited to attend and encouraged to provide comments on the 2015 Annual Action Plan with the expectation of input from the experts at the various member organizations.
3	<b>Agency/Group/Organization</b>	VILLAGE OF BARTONVILLE
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted via letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise and this will improve coordination and cooperation among local governments to improve the programming and outcomes of the 2015 Annual Action Plan.
4	<b>Agency/Group/Organization</b>	Village of Creve Coeur
	<b>Agency/Group/Organization Type</b>	Other government - Local

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted via letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise and this will improve coordination and cooperation among local governments to improve the programming and outcomes of the 2015 Annual Action Plan.
5	<b>Agency/Group/Organization</b>	EAST PEORIA
	<b>Agency/Group/Organization Type</b>	Other government - Local

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted via letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise and this will improve coordination and cooperation among local governments to improve the programming and outcomes of the 2015 Annual Action Plan.
6	<b>Agency/Group/Organization</b>	PEORIA
	<b>Agency/Group/Organization Type</b>	Housing Service-Fair Housing Publicly Funded Institution/System of Care Other government - Local Planning organization Community Development Financial Institution Foundation Grantee Department Major Employer

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City of Peoria is the grantee for this Annual Action Plan. As such, it is the consulting body that is seeking to coordinate and consult to improve anticipated outcomes from the use of CDBG, HOME, and ESG funding.
7	<b>Agency/Group/Organization</b>	COUNTY OF PEORIA
	<b>Agency/Group/Organization Type</b>	Other government - County Major Employer

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted via letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise and this will improve coordination and cooperation among local governments to improve the programming and outcomes of the 2015 Annual Action Plan.
8	<b>Agency/Group/Organization</b>	Peoria City/County Health Department
	<b>Agency/Group/Organization Type</b>	Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Health Services-Education Health Agency Other government - County Regional organization Planning organization

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Anti-poverty Strategy Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted via letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise and this will improve coordination and cooperation among local governments to improve the programming and outcomes of the 2015 Annual Action Plan.
9	<b>Agency/Group/Organization</b>	Village of Peoria Heights
	<b>Agency/Group/Organization Type</b>	Housing Other government - Local

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted via letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise and this will improve coordination and cooperation among local governments to improve the programming and outcomes of the 2015 Annual Action Plan.
10	<b>Agency/Group/Organization</b>	PEORIA PUBLIC SCHOOLS DISTRICT 150
	<b>Agency/Group/Organization Type</b>	Services-Children Services-homeless Services-Education Other government - Local Local School District Major Employer
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted via letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise and this will improve cooperation among local governments and the public education system to improve programming and outcomes of the 2015 Annual Action Plan.
11	<b>Agency/Group/Organization</b>	Peoria Park District
	<b>Agency/Group/Organization Type</b>	Services-Health Other government - Local Recreational Services
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted via letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve programming and outcomes of the 2015 Annual Action Plan.
12	<b>Agency/Group/Organization</b>	Tri-County Regional Planning Commission
	<b>Agency/Group/Organization Type</b>	Housing Service-Fair Housing Regional organization Planning organization Business Leaders Civic Leaders Business and Civic Leaders Community Development Financial Institution Foundation Major Employer Private Sector Banking / Financing

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted via letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve programming and outcomes of the 2015 Annual Action Plan.
13	<b>Agency/Group/Organization</b>	COUNSELING AND FAMILY SERVICES
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Health Child Welfare Agency
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted via letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve programming and outcomes of the 2015 Annual Action Plan.
14	<b>Agency/Group/Organization</b>	ADVOCATES FOR ACCESS
	<b>Agency/Group/Organization Type</b>	Housing Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Health Health Agency

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Market Analysis Anti-poverty Strategy Lead-based Paint Strategy Accessibility Services
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted via letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve programming and outcomes of the 2015 Annual Action Plan.
15	<b>Agency/Group/Organization</b>	CENTER FOR THE PREVENTION OF ABUSE
	<b>Agency/Group/Organization Type</b>	Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Service-Fair Housing Services - Victims

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted via letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve programming and outcomes of the 2015 Annual Action Plan.
16	<b>Agency/Group/Organization</b>	Central Illinois Council on Aging
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Services-Education Service-Fair Housing Health Agency Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted via letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve programming and outcomes of the 2015 Annual Action Plan.
17	<b>Agency/Group/Organization</b>	Greater Peoria Airport
	<b>Agency/Group/Organization Type</b>	Regional organization Business Leaders Civic Leaders Business and Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted via letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve programming and outcomes of the 2015 Annual Action Plan.
18	<b>Agency/Group/Organization</b>	Illinois American Water Co.
	<b>Agency/Group/Organization Type</b>	Housing Regional organization Planning organization Utility
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted via letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve programming and outcomes of the 2015 Annual Action Plan.

19	<b>Agency/Group/Organization</b>	ILLINOIS HOUSING DEVELOPMENT AUTHORITY
	<b>Agency/Group/Organization Type</b>	Housing Service-Fair Housing Other government - State Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted via letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve programming and outcomes of the 2015 Annual Action Plan.
20	<b>Agency/Group/Organization</b>	Illinois Department of Commerce & Econ. Dev
	<b>Agency/Group/Organization Type</b>	Services-Employment Other government - State Planning organization Business Leaders

	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted via letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise and this will improve coordination and cooperation among government entities to improve the programming and outcomes of the 2015 Annual Action Plan.
21	<b>Agency/Group/Organization</b>	Illinois Historic Preservation Agency
	<b>Agency/Group/Organization Type</b>	Housing Other government - State Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Historic Preservation
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted via letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise and this will improve coordination and cooperation among government entities to improve the programming and outcomes of the 2015 Annual Action Plan.
22	<b>Agency/Group/Organization</b>	Illinois Department of Public Health
	<b>Agency/Group/Organization Type</b>	Services-Persons with HIV/AIDS Health Agency Other government - State

	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted via letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise and this will improve coordination and cooperation among government entities to improve the programming and outcomes of the 2015 Annual Action Plan.
23	<b>Agency/Group/Organization</b>	UNIVERSITY OF ILLINOIS
	<b>Agency/Group/Organization Type</b>	Services-Persons with HIV/AIDS Services-Health Health Agency Publicly Funded Institution/System of Care Other government - State Regional organization Major Employer
	<b>What section of the Plan was addressed by Consultation?</b>	HOPWA Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization was consulted via letter. The City anticipates that those consulted will provide comments regarding their own areas of expertise to improve programming and outcomes of the 2015 Annual Action Plan.

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

There were not any agency types that were not consulted.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	HOIHCOC - Heart of Illinois Homeless Continuum of Care	Both the City and the HOIHCOC work to end homelessness, following HUD regulations and key initiatives. The goals of the Strategic Plan have been coordinated with those of the Heart of Illinois Homeless Continuum of Care to make sure that areas of need are addressed.
City of Peoria Comprehensive Plan	City of Peoria	The goals of the Strategic Plan have been developed in concert with those contained in the City of Peoria Comprehensive Plan in order to address critical issues.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

With respect to the public entities involved, does the plan describe the means of cooperation among the state and local units of government in the metropolitan area in the implementation of the plan?

The City does not have intergovernmental agreements with other units of local governments or the State for the implementation of the 2015 Annual Action Plan. The City welcomes the opportunity to leverage area resources to meet the strategic goals of the Plan. The Peoria Metropolitan Statistical Area contains two HUD entitlement communities – City of Pekin and City of Peoria. The City often discusses best practices, policies and community development needs of the region with City of Pekin staff.

Other units of local government are referral agencies for many low-income residents of the City. The Peoria Township Relief Office provides emergency cash grant funding, eyeglasses and exams, prescription and limited dental assistance to low-income residents of Peoria Township.

Additionally, the Peoria County Assessor's Office provides detailed and descriptive information for property tax exemptions and freezes that save low-income, senior citizens and disabled homeowners money on their annual property tax bill.

The City is also a Board Member of the Greater Peoria Economic Development Council (EDC). The EDC was established in 1982 and is a 501(c) 6 non-profit organization governed by a board of directors including individuals from both the public and the private sector. The EDC has focused strategies for employment creation, job retention, population growth and transitioning families with young children out of poverty.

## **AP-12 Participation – 91.105, 91.200(c)**

### **1. Summary of citizen participation process/efforts made to broaden citizen participation**

#### **Summarize citizen participation process and how it impacted goal-setting**

For the creation of the 2015 Annual Action Plan the City followed the City of Peoria Citizen Participation Plan. This included public hearings, a 30-day comment period, and independent meetings designed to encourage input from housing authority residents, neighborhood associations, minorities, non-English speaking, residents from predominantly low and moderate income neighborhoods, the disabled, and the homeless Continuum of Care. Mailings were also used to gain input from entities with specific expertise, including but not limited to those in the areas of housing, non-housing, community development, homelessness and the near homeless. This effort met and exceeded the requirements of the City’s Citizen Participation Plan and provided meaningful input for the creation of the 2015 Annual Action Plan.

Public hearings were held at different times through the 2014 and 2015 calendar years to obtain citizen comments on issues related to the housing, non-housing and community development needs in the City. Public hearings were held on September 9, 2014 and March 10, 2015. Public notices for each hearing were published in the Peoria Journal Star newspaper. These public hearings allowed the public to comment on the development of the 2015 Annual Action Plan. The citizen participation processes noted above and outreach identified in the tables below were held prior to the preparation of the Plan.

A draft copy of the 2015 Annual Action Plan was made available for public review and comment from February 23, 2015 to March 24, 2015 (30-day comment period). Public notice of the 30-day comment period was published on February 19, 2015 in the Peoria Journal Star newspaper. Copies of 2015 draft Annual Action Plan were available for review at the following locations:

- City of Peoria City Clerk’s Office
- City of Peoria Community Development Department
- Peoria Public Library, Downtown Branch
- Peoria Housing Authority

There are no Colonias (unregulated housing settlements) in the City of Peoria and therefore no related consultation was required.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Persons with disabilities	One meeting with the Mayor's Advisory Committee for the Disabled to reach the elderly and disabled group had 5 persons attending.	1. Rehab dilapidated homes and rent or sell 10% to the disabled.2. Earmark some down payment assistance funds for use by the disabled.3. There is a need for rental accessible units for all disabilities.4. There is a need to retrofit single family homes and sell them to the tenants.5. The City should assist tenants pay for retrofitting homes.6. The City should fund an Advocates for Access home ramp program.7. There is a lack of housing for those with mental disorders.8. Help make sure the mentally ill take their medication.	1. The City does not own homes to rehab and then rent or sell.2. There are adequate down payment funds available through local lenders and City resources do not need to be allocated.3. The City is providing HOME funds for the Schlarman House rental project to rehab existing apartment units that serve extremely low income, elderly and disabled individuals.4. See 1 above.5. The City's rehab programs assist owner owned properties.6. Advocates for Access has not requested ramp funding from the City.7. The City will provide funding to Access Peoria, LLC for the construction of new rental units for individuals with disabilities, including mental illness. 8. The City does not have the authority to require the mentally ill individuals to take their medication.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Meeting	Minorities Non-targeted/broad community	One meeting with the Neighborhood Alliance to reach neighborhood leaders and residents with 24 attending.	<p>1. The PHA needs to diversify resident locations.2. The City should buy land for a Golden Acres area park.3. The City should encourage locating affordable housing throughout the City.4. Encourage housing price variety throughout the City for a healthy housing market.5. City of Richmond provides \$20,000 to commercial property owners for creating housing above 1st floor.6. PHA should require tenants to clean and care for their home.7. City of Peoria CDBG HILP repaid funds should go back into housing programs.8. Housing managers need to be accountable.9. Code Enforcement Officer Glenda Williams is doing a great job.10. Create and fund a lawn mower free use program.11. Create a trash ordinance making the source of the litter responsible and not site the property owner.12. Hire more Code Enforcement Officers.13. Place street addresses on the front and rear of all properties.14. Make tenants and property owners both responsible for property conditions.15. Create a renter property maintenance education program.</p>	<p>1. The PHA encourages their housing developments in many areas of the City.2. The purchase of land for a Golden Areas park is being evaluated.3. Affordable housing locations is somewhat market driven. However, the City promotes available down payment assistance programs to low income buyers to provide additional resources to increase eligible purchase prices. The City works with housing developers to assist with location selection.4. Housing costs are determined by the market.5. This project is being considered but is not a 2015 activity.6. The care of PHA homes is the responsibility of PHA and City Code Enforcement staff works with PHA to resolve such issues.7. CDBG HILP repaid funds are reused as approved by the City Council.8. The responsibility of property managers are determined by the property owner, however City Code Enforcement staff educates property owners of property maintenance through the annual landlord training and hearing officer process for code violation tickets.9. The City recognizes and encourages the professional accomplishments of staff. 10. A lawn cutting program already exists and the City supports the continuation of this program.11. Trash is the responsibility of the property owner and violations are actively enforced by Code Enforcement staff.12. The City is seeking to hire additional Code Enforcement officers with CDBG funds in 2015.13. Current ordinances only require addresses on the front of a property as not all properties have alley access.14. Current ordinances require the property owner to remain responsible for his/her property.15. An independent rental property maintenance program is not being considered due to cost constraints, however property maintenance issues and nuisance laws are discussed at the annual landlord training sessions.</p>	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Public Meeting	Minorities LISC Targeted Areas	Two meetings. One at Neighborhood House with about 60 attending from the southside neighborhoods of Peoria. The other at the Glen Oak Learning Center with about 100 attending from the East Bluff neighborhood. Both meetings were sponsored by Peoria LISC (Local Initiatives Support Coalition) to identify needs and opportunities.	Comments from the Neighborhood House meeting. Problems identified are:1. Crime/Safety2. Blight3. Unemployment and lack of opportunity, including economic opportunity4. Low housing cost and vacant homes and lots5. Access to food6. Financial literacyComments from the Glen Oak Learning Center meeting. Problems identified are: a. Crime/Safetyb. Blightc. Youth outreachd. Marketing of the neighborhoode. Retail attraction	1. Crime and safety are being addressed through police programs, including new resident officer programs in both areas.2. Blight issues are addressed with code enforcement and the new resident officer program.3. Unemployment and lack of economic opportunity are being addressed with the CDBG Economic Development activity and other programs offered by the Community Development Department.4. Low housing costs and vacant homes and lots are addressed through new homes built by the City CHDO, Habitat for Humanity.5. Access to food is being addressed through Gifts in the Moment fresh food gardens and mobile food HUB.6. Financial literacy is provided by local HUD certified housing counseling organizations.c. Youth outreach services are provided by the Boys and Girls Club of Greater Peoria, Common Place, Children's Home and others.d. Marketing of the neighborhood is being addressed through LISC, East Bluff Neighborhood Housing Services and neighborhood agencies. e. Retail attraction will begin in 2015. A Wisconsin Business Corridor Plan has been drafted to improve the business district.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Meeting	Minorities Residents of Public and Assisted Housing	One meeting was held at Taft Homes with 13 public housing residents attending.	Comments from the Taft Homes meeting. Problems identified are:1. The East Bluff area and Taft Homes needs a children's day care center.2. Need credit score help.3. There is a need for Down Payment Assistance. 4. An increase in day care assistance is needed near the Citi Link Downtown Center.5. A full service grocery store is needed in the near north side and the southside.6. There is a need for handicap accessible homes available for purchase.7. There is a need for more care providers for the disabled.	1. Day care is provided but not at these locations.2. Credit score help is provided by METEC Inc. and Central Illinois Debt Management and Credit Education.3. Down Payment Assistance is provided through the Illinois Housing Development Authority.4. There are no plans for additional daycare facilities near the Citi Link Downtown facility.5. A full service grocery store in the southside is being discussed. Gifts in the Moment is supplying fresh food garden on the southside and a fresh food mobile food HUB is planned to deliver food in food desert areas in Peoria.6. Handicap accessible homes for purchase are in short supply. These are expected to become more available as home owners with disabilities sell their homes.7. EP!C and Bridgeway are two serve providers for the disabled in Peoria. Additional providers have contacted the City to enter the market.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Public Meeting	Persons with disabilities Residents of Public and Assisted Housing Elderly	One meeting was held at Sterling Towers with 26 public housing senior citizens attending.	Comments from the Sterling Towers meeting. Problems identified are: 1. There is a need for teaching trades.2. Citi Link buses should go into the ICC campus on University. Ramps need to be installed on streets in the ICC Campus.3. Repair the pot holes on Gale in front of Sterling Towers.4. There should be more affordable housing for seniors.5. Peoria has good food pantries system but they should be open in the evening.6. There is a need for evening daycare.7. Businesses, such as restaurants, should have internships at ICC.8. There is a need for tutors for GED and college level courses.9. Raccoons in the Sterling Towers area need to be removed.	1. Trades are instructed at various locations but not at Sterling Towers.2. Citi Link was advised of request to run buses into the ICC campus and of the need for handicap ramps.3. The potholes in front of Sterling Towers have been filled.4. The City of Peoria does not build senior housing but reviews such requests during the City's development review process.5. Food pantries are operated by not-for profits and volunteers are available mostly in the morning.6. Evening daycare is offered at Crittenton Centers.7. Peoria businesses hire from the labor market and normally do not offer internships.8. Sterling Towers may request tutors to the PHA or find them within the Sterling Towers residents.9. Raccoons are in the wooded areas and are natural to the environment.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Public Meeting	Non-English Speaking - Specify other language: Spanish  Low income area	One meeting was held at the Peoria Friendship House of Christian Service with 7 Hispanic residents attending.	Comments from the Peoria Friendship House of Christian Service meeting. Problems identified are:1. Need a Sunday bus into Walmart.2. City rehab program to repair detached garages.3. Program to address mold in homes.4. Need for a taxi or other transportation to the doctor or stores. A small bus is needed.5. More bilingual workers at doctors office and all offices serving the public.6. Public telephones for emergencies all over the City.7. More Spanish speaking personnel receiving calls.8. Tall grass and rats.9. Peoria CARES in Spanish.10. Cleaning the streets.11. Gas smell.12. Public transportation that can deliver and pick up all persons where needed.13. Social worker who can help parents with their rough teenagers.14. Exercise equipment should be available for low income.	1. Sunday Citi Link bus service was recently initiated and goes to Walmart on Allen Road.2. The repair of a detached garage is not permitted with HUD funded housing rehabilitation programs.3. The City's IHDA Emergency Repair Program addresses mold in homes but is limited to the Vinton Highlands Area.4. Peoria Friendship House provides such transportation but is not able to meet the need.5. The number of bilingual office workers is currently limited but is expected to increase as the Hispanic population increases.6. Installing public emergency phones is decided by private property owners.7. The number of Spanish speaking employees receiving business phone calls will increase as the Hispanic population increases.8. The complaint about tall grass and rats was reported to Code Enforcement.9. Adding a Spanish element to Peoria CARES was reported to Peoria CARES.10. The streets was reported as cleaned.11. Residents were told to call Ameren regarding gas smells.12. Citi Link provides specialized services for the mobility impaired. Other residents must use a cab service.13. Various agencies have counseling that can help parents with unruly teenagers.14. Exercise equipment will be available at Peoria Friendship House.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
7	Public Hearing	Non-targeted/broad community	Two public hearings were held on March 10, 2015 at City Hall for public comment on the draft 2015 Annual Action Plan and one person attended.	Comments from the public hearing. Problems identified include:1. Lack of accessible housing for people with disabilities and the elderly. Long wait times for people exiting nursing homes due to lack of accessible housing. 2. Other resources available for home care include Advocates for Access's database of personal assistance, Division of Rehab services program and Central Illinois Agency on Aging Accelerated Case Management programs. 3. City of Chicago has a homemaker program that fills the gap for people not qualified for state programs to provide assistance with home tasks for the elderly and those with disabilities. 4. Peoria Housing Authority previously set aside vouchers for people with disabilities, but no longer does. 5. Did not realize that the local homeless Continuum of Care was active and meeting regularly.	1. The City of Peoria also believes this is an issue in the community. The City has allocated \$408,827 in HOME funds to Access Peoria, LLC for the construction of new rental units for low income individuals with disabilities. Construction should begin in Spring 2015. 2. These additional resources will be utilized in any future requests for service from the public and distributed to our partner organizations. 3. The City did not have any applications through the public service program for this type of program. The City is funding other programs that serve this population through CDBG Public Service grants. 4. This comment was forwarded to the Peoria Housing Authority. 5. The HOIHCOC is active and has a new Governing Board. Meeting information was provided as well as adding the public hearing attendee to the Continuum email list for future updates and meeting notices.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
8	Letter	Non-targeted/broad community	Letters were sent to state and local agencies as well as area non-profit organizations soliciting comments on the draft 2015 Annual Action Plan. One response was received from the Peoria City/County Health Department.	1. The Lead Match Program is not listed as a project in the 2015 Annual Action Plan.	1. \$50,000 in CDBG funds for the Lead Match Program were included in the 2014 Annual Action plan and are still reserved for this activity. Since the Health Department did not receive their grant in 2014, the \$50,000 in matching funds will still be available in 2015 should the Health Department be awarded the grant for this activity.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
9	Public Meeting	Non-targeted/broad community	The Annual Action Plan was discussed at a City Council Meeting. Approximately 40 citizens were in attendance along with all 10 City Council Members and the Mayor.	1. Council Member Akenson requested Community Development Director Ross Black explain the Annual Action Plan. 2. Council Member Jensen questioned the overall decrease in funding as well as the comparison for code enforcement delivery. 3. Council Member Moore expressed concerns with the need to hire additional code enforcement officers. She asked what expectations the City had in the hiring of additional staff.	1. Director Black explained that the department submits an Annual Action plan to HUD on an Annual basis and that in 2015 the City would receive \$2.1 million in grant funds. He also explained how the CAPER is submitted in March. 2. Director Black did not have specific dollar amounts for the overall decrease, but that CDBG funds had been increased in 2015 for code enforcement delivery. 3. Director Black responded that the Code Enforcement position was posted and interviews should occur in the next few weeks.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
10	Internet Outreach	Non-targeted/broad community	The draft of the Annual Action plan was placed on the City's website to solicit public comments. One citizen responded.	1. It is my understanding that other communities have utilized initiatives such as inclusionary zoning and source of income as a protected class to help promote affordable housing choice. Many families struggle to balance budgets and are forced to make choices that impact access to high quality amenities. Homeownership can become very challenging and not only for low income families. For rental properties, owners may indicate they cannot accommodate section 8 assistance. I'd like to see our community explore these initiatives. For many working families, there is also a lack of affordable before school programs that help parents be in the position to maintain stable employment and housing.	1. The City is open to exploring the suggested initiatives on a regional basis with our fellow local governments and our affordable housing partners. The City also agrees that access to before school options can assist in stabilizing households and neighborhoods. We will provide this comment to the local school districts and organizations that provide child care services.	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

On February 10, 2015, the Office of Community Planning and Development for HUD announced the FY 2015 formula allocations for Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and Emergency Solutions Grant (ESG) programs. Per the announcement, the City anticipates receiving the following amounts for its 2015 program year: \$1,555,133 in CDBG funds; \$480,361 in HOME funds; and \$141,005 in ESG funds. The City's 2015 program year is from January 1, 2015 to December 31, 2015.

#### Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,555,133	0	97,000	1,652,133	4,665,399	The prior year resources of approximately \$97,000 is entitlement funds that need to be allocated to an individual activity. Expected amount is estimated amount for final three years of consolidated plan. Please see below regarding how these funds will be leveraged.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	480,361	10,000	15,000	505,361	1,441,083	The prior year resources of approximately \$15,000 is 2014 entitlement funds that need to be allocated to an individual activity. Anticipated Program income for 2015 is approximately \$10,000. Expected amount is estimated amount for final three years of consolidated plan. Please see below regarding how these funds will be leveraged and match requirements.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	141,005	0	0	141,005	423,015	All previous year grant awards for ESG have been allocated to individual sub grantees for eligible ESG activities. Expected amount is estimated amount for final three years of consolidated plan. Please see below regarding how these funds will be leveraged and match requirements.

Table 5 - Expected Resources – Priority Table

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

The federal funds identified above will leverage additional private, state and local funds. This may include private funds for the installation of emergency furnaces provided by the local utility provider, Ameren Illinois Utilities.

The City allocates approximately \$200,000 in corporate funds annually for supportive neighborhood development activities, including but not limited to crime prevention, public safety initiatives, housing rehabilitation and capacity building of organizations. The combined investment of corporate, state and federal funds into Peoria neighborhoods yields holistic and sustainable results.

**Match Requirements:**

The Community Development Block Grant program has no match requirement.

The HOME regulatory match is 25% of the total grant expenditures in a program year, excluding admin costs. On an annual basis HUD publishes the HOME match reduction list which includes match reductions granted to certain communities due to fiscal distress, severe fiscal distress and Presidential disaster declarations. Fiscal distress of a community is based upon the percentage of families in poverty. For program year 2015, the City was included on the FY 2015 HOME Match Reduction List at a match reduction of 50%; resulting a total match requirement of 12.5% for the 2015 program year. The City has received this match reduction (50%; yielding a 12.5% match requirement) since the 2003 program year. HOME match is achieved through cash contributions from non-Federal sources from HOME funded organizations. Match may also be achieved from prior year match balances.

The Emergency Solutions Grant (ESG) requires a 100% match. This match is achieved through cash contributions of other non-ESG HUD funds, other Federal funds, State government funds, and private funds provided by the City and ESG subrecipients organizations. Match funds from previous years have included funds from the State of Illinois Department of Commerce and Economic Opportunity (DCEO), the City of Peoria, the Illinois Department of Human Services (IDHS), the Federal Emergency Management Agency (FEMA), the local United Way and private funds of a subrecipient organization.

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

The City, through the City Manager's office, now employs a real estate coordinator that manages City owned land and property. In discussions with the City's certified CHDOs, there may be an opportunity to increase the availability of vacant property for in-fill new construction of single family homes. Any disposition of land or property, particularly property located with a City's Tax Increment Financing (TIF) District, will require a public notice process before land can be sold or transferred.

**Discussion**

In 2015, CDBG funds will be used for a Clearance/Demolition activity in the amount of \$250,000. This activity will be completed on a spot blight, City-wide basis. This activity is not listed in the CDBG Use of Funds section on the Priority Table above.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Focus Area Housing Program Leverage	2014	2018	Affordable Housing	CDBG Target Area	Affordable Housing - New construction Affordable housing - Rehab of existing units	CDBG: \$256,200 HOME: \$142,361	Rental units constructed: 2 Household Housing Unit Homeowner Housing Added: 1 Household Housing Unit Homeowner Housing Rehabilitated: 1 Household Housing Unit Housing Code Enforcement/Foreclosed Property Care: 400 Household Housing Unit
2	Roof Housing Rehabilitation Program	2014	2018	Affordable Housing	CDBG Target Area	Affordable housing - Rehab of existing units	CDBG: \$218,051	Homeowner Housing Rehabilitated: 14 Household Housing Unit
3	Demolition Program	2014	2018	Non-Housing Community Development	CDBG Target Area	Clearance	CDBG: \$250,000	Buildings Demolished: 28 Buildings
4	CHDO Set Aside	2014	2018	Affordable Housing	CDBG Target Area	Affordable Housing - New construction	HOME: \$300,000	Homeowner Housing Added: 3 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Public Service Set Aside	2014	2018	Non-Housing Community Development		Public Services	CDBG: \$233,269	Public service activities other than Low/Moderate Income Housing Benefit: 2000 Persons Assisted
6	Emergency Solutions Grant	2014	2018	Homeless		Homeless- Emergency Shelter Homelessness - Rapid Re-housing	ESG: \$141,005	Tenant-based rental assistance / Rapid Rehousing: 10 Households Assisted Homeless Person Overnight Shelter: 300 Persons Assisted
7	Planning / General Administration	2014	2018	Planning / General Administration			CDBG: \$291,039 HOME: \$38,000	
8	Housing Rehabilitation Delivery	2014	2018	Affordable Housing		Affordable housing - Rehab of existing units	CDBG: \$106,574	
9	ADA Ramp Program	2014	2018	Non-Housing Community Development	CDBG Target Area	Public Improvements and Infrastructure	CDBG: \$200,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2000 Persons Assisted

**Table 6 – Goals Summary**

## Goal Descriptions

1	<b>Goal Name</b>	Focus Area Housing Program Leverage
	<b>Goal Description</b>	
2	<b>Goal Name</b>	Roof Housing Rehabilitation Program
	<b>Goal Description</b>	This goal is to install new roofing, associated materials and rehabilitation to ensure a property is habitable on eligible owner occupied single family homes. Please note that the activity is city-wide, but will primarily serve the geographic areas noted below.
3	<b>Goal Name</b>	Demolition Program
	<b>Goal Description</b>	This goal is to clear deteriorated structures on a spot blight basis. Please note that the activity is city-wide, but will primarily serve the geographic areas noted below.
4	<b>Goal Name</b>	CHDO Set Aside
	<b>Goal Description</b>	This goal is to create new housing units for low income eligible households using no less than 15% of HOME Investment Partnership funds. This goal will be associated with activities only be completed by certified Community Housing Development Organizations (CHDO). The City will certified an organization's CHDO status prior to committing any HOME funds under this goal/activity. Please note that the activity is city-wide, but will primarily serve the geographic areas noted below.
5	<b>Goal Name</b>	Public Service Set Aside
	<b>Goal Description</b>	This goal is to provide a variety of public services to be utilized by low income residents. This goal will be accomplished through the City's subgrantee agreements with local service providers.

6	<b>Goal Name</b>	Emergency Solutions Grant
	<b>Goal Description</b>	This goal will provide rapid re-housing assistance, emergency shelter and case management services to eligible homeless individuals. Additionally this goal will include funds for grant administration and HMIS (Homeless Management Information System) activities. The City will partner with the Heart of Illinois Homeless Continuum of Care for funding allocation and goal performance.
7	<b>Goal Name</b>	Planning / General Administration
	<b>Goal Description</b>	This goal is to ensure the CDBG and HOME grants and their associated activities are properly planned and administered. Please note that ESG planning/general administration is included under the Strategic Plan Goal for ESG. The total amount of administration allocated in ESG is \$9,000 for program year 2015.
8	<b>Goal Name</b>	Housing Rehabilitation Delivery
	<b>Goal Description</b>	This goal is for staff costs associated with the housing rehab programs funded with CDBG. It is designed to ensure that the housing rehabilitation activities are properly inspected and administered. This goal's outcome indicators will be reported in the Roof Housing Rehabilitation Program, listed as goal #3 in the 2015 Annual Plan.
9	<b>Goal Name</b>	ADA Ramp Program
	<b>Goal Description</b>	This activity will install ADA ramps at intersections and other pedestrian crossing areas. Please note that the activity is city-wide, but may include the geographic area noted below. For the Goal Outcome Indicator listed below, the City expects that the total persons assisted under this goal will be 2,000. During the 5 year period of the Consolidated Plan in which this Strategic Plan Goal is included, the City expects that a total of 10,000 persons will be assisted under the ADA Ramp Program if the Program is funded in each year of the Consolidated Plan. This goal performance expectation is based upon the 2013 American Community Survey which reported 12,204 disabled individuals in Peoria. Since this goal will be provided city-wide, the City anticipates that it will serve 80% of the total reported disabled individuals.

**Table 7 – Goal Descriptions**

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):**

The City uses the IRS Form 1040 Adjusted Gross Income definition for its HOME program. Under this definition the City expects to serve 2 extremely low income (households below 30% of AMI), 2 low-income (households between 31%-50% of AMI) and 3 low-moderate-income (51%-80% AMI).

## AP-35 Projects – 91.220(d)

### Introduction

The projects listed below will address the high priority needs in 2015.

#	Project Name
1	Focus Area Housing Leverage
2	Housing Rehab Programs
3	Demolition Program
4	CHDO Set Aside
5	Public Service Set Aside
6	ESG15 Peoria
7	Code Enforcement
8	Planning / General Administration
9	Housing Rehabilitation Delivery
10	ADA Ramps

**Table 8 – Project Information**

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

The reason for these allocation priorities is that they address the high priority identified needs contained in the 2014-2018 Consolidated Plan. Funding priorities have not changed from those outlined in the Consolidated Plan. There are no known obstacles in addressing underserved needs or proposed actions.

## Projects

### AP-38 Projects Summary

#### Project Summary Information

Table 9 – Project Summary

<b>1</b>	<b>Project Name</b>	Focus Area Housing Leverage
	<b>Target Area</b>	CDBG Target Area
	<b>Goals Supported</b>	Focus Area Housing Program Leverage
	<b>Needs Addressed</b>	Affordable Housing - New construction Affordable housing - Rehab of existing units
	<b>Funding</b>	HOME: \$142,361
	<b>Description</b>	HOME funded housing activities related to this goal could include rehab of owner occupied units, rehab of rental units, new construction of rental units, new construction of homebuyer units and/or homebuyer direct assistance. Please note that this activity is city-wide, but allocated funding will be used primarily to support targeted neighborhood revitalization strategies in an identified geographic area. Prioritization of funding will be given to activities that are also located in the CDBG Target Area (low income area- where 51% or more of the resident households have reported incomes at 80% or below area median income).
	<b>Target Date</b>	12/31/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Four low-income families.
	<b>Location Description</b>	City-Wide

	<b>Planned Activities</b>	HOME funded housing activities related to this goal could include rehab of owner occupied units, rehab of rental units, new construction of rental units, new construction of homebuyer units and/or homebuyer direct assistance. Please note that this activity is city-wide, but allocated funding will be used primarily to support targeted neighborhood revitalization strategies in an identified geographic area. Prioritization of funding will be given to activities that are also located in the CDBG Target Area (low income area- where 51% or more of the resident households have reported incomes at 80% or below area median income).
<b>2</b>	<b>Project Name</b>	Housing Rehab Programs
	<b>Target Area</b>	CDBG Target Area
	<b>Goals Supported</b>	Roof Housing Rehabilitation Program
	<b>Needs Addressed</b>	Affordable housing - Rehab of existing units
	<b>Funding</b>	CDBG: \$218,051
	<b>Description</b>	This goal is to install new roofing, associated materials and rehabilitation to ensure the property is habitable on eligible owner occupied single family homes.
	<b>Target Date</b>	12/31/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Fourteen low income families.
	<b>Location Description</b>	City-wide.
	<b>Planned Activities</b>	Planned activities are to receive and approve applications for eligible low income, owner occupied, single family homes for rehabilitation and roof repair to ensure the property is habitable.
<b>3</b>	<b>Project Name</b>	Demolition Program
	<b>Target Area</b>	CDBG Target Area
	<b>Goals Supported</b>	Demolition Program
	<b>Needs Addressed</b>	Clearance

	<b>Funding</b>	CDBG: \$250,000
	<b>Description</b>	This activity is to clear deteriorated structures on a spot basis.
	<b>Target Date</b>	12/31/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 28 vacant homes will be demolished. No families will benefit. Benefit accrues to buildings.
	<b>Location Description</b>	City-wide, but will also include CDBG target area.
	<b>Planned Activities</b>	The planned activity is to remove deteriorated blighting structures.
<b>4</b>	<b>Project Name</b>	CHDO Set Aside
	<b>Target Area</b>	CDBG Target Area
	<b>Goals Supported</b>	CHDO Set Aside
	<b>Needs Addressed</b>	Affordable Housing - New construction
	<b>Funding</b>	HOME: \$300,000
	<b>Description</b>	This activity is to create new housing units for low income eligible households using no less than 15% of HOME Investment Partnership funds. This goal will be associated with activities only be completed by certified Community Housing Development Organizations (CHDO). The City will certified an organization's CHDO status prior to committing any HOME funds under this goal/activity. Please note that the activity is city-wide, but will primarily serve the geographic areas noted below.
	<b>Target Date</b>	12/31/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Three low income families.
	<b>Location Description</b>	City-wide.

	<b>Planned Activities</b>	This activity is to create new housing units for low income eligible households using no less than 15% of HOME Investment Partnership funds. This goal will be associated with activities only be completed by certified Community Housing Development Organizations (CHDO). The City will certified an organization's CHDO status prior to committing any HOME funds under this goal/activity. Please note that the activity is city-wide, but will primarily serve the geographic areas noted below.
5	<b>Project Name</b>	Public Service Set Aside
	<b>Target Area</b>	CDBG Target Area
	<b>Goals Supported</b>	Public Service Set Aside
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$233,269
	<b>Description</b>	This goal is to provide a variety of public services to be utilized by low income residents. This goal will be accomplished through the City's subgrantee agreements with local service providers. This activity is city-wide but many of the sites will be in the target areas.
	<b>Target Date</b>	12/31/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 2000 low income individuals.
	<b>Location Description</b>	City-wide.
	<b>Planned Activities</b>	This goal is to provide a variety of public services to be utilized by low income residents. This goal will be accomplished through the City's subgrantee agreements with local service providers. Planned activities include services to benefit youth, child care, mental health, senior and abused and neglected children.
6	<b>Project Name</b>	ESG15 Peoria
	<b>Target Area</b>	
	<b>Goals Supported</b>	Emergency Solutions Grant

	<b>Needs Addressed</b>	Homeless-Emergency Shelter Homelessness - Rapid Re-housing
	<b>Funding</b>	ESG: \$141,005
	<b>Description</b>	This activity will provide rapid re-housing assistance, emergency shelter and case management services to eligible homeless individuals. Additionally, this goal will include funds for grant administration and HMIS (Homeless Management Information System) activities and may include street outreach and homeless prevention. The City will partner with the Heart of Illinois Homeless Continuum of Care for funding allocation and goal performance. In addition, administration costs for staff (\$9,000 which is less than 7.5% of total grant award) will be retained by the City for general management, oversight and coordination of the ESG program.
	<b>Target Date</b>	12/31/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 300 homeless persons and 10 homeless families.
	<b>Location Description</b>	City-wide.
	<b>Planned Activities</b>	Project activities will include rapid re-housing assistance, emergency shelter operations, housing relocation and stabilization services, street outreach, homeless prevention and HMIS user participation fees. In addition, administration costs for staff (\$9,000 which is less than 7.5% of total grant award) will be retained by the City for general management, oversight and coordination of the ESG program.
<b>7</b>	<b>Project Name</b>	Code Enforcement
	<b>Target Area</b>	CDBG Target Area
	<b>Goals Supported</b>	Focus Area Housing Program Leverage
	<b>Needs Addressed</b>	Affordable housing - Rehab of existing units Clearance
	<b>Funding</b>	CDBG: \$256,200

	<b>Description</b>	This activity will include code enforcement inspections and staff related costs. This activity will only occur in the CDBG Target Area of the City.
	<b>Target Date</b>	12/31/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 400 low income families.
	<b>Location Description</b>	Code enforcement activities will focus on CDBG targeted area.
	<b>Planned Activities</b>	This activity will include code enforcement inspections and staff related costs. This activity will only occur in the CDBG Target Area of the City.
8	<b>Project Name</b>	Planning / General Administration
	<b>Target Area</b>	CDBG Target Area
	<b>Goals Supported</b>	Planning / General Administration
	<b>Needs Addressed</b>	Affordable Housing - New construction Affordable housing - Rehab of existing units Homeless-Emergency Shelter Homelessness - Rapid Re-housing Public Services Economic Development Clearance
	<b>Funding</b>	CDBG: \$291,039 HOME: \$38,000
	<b>Description</b>	This activity is to ensure the CDBG and HOME grants and their associated activities are properly planned and administered. Please note that ESG planning/general administration is included under the Strategic Plan Goal for ESG. The total amount of administration allocated in ESG is \$9,000 for program year 2015.
	<b>Target Date</b>	12/31/2015

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Planning and administration activities are not subject to benefit numbers.
	<b>Location Description</b>	City-wide.
	<b>Planned Activities</b>	The planned activities are for administering the CDBG and HOME grants and associated activities and coordination with related programs.
<b>9</b>	<b>Project Name</b>	Housing Rehabilitation Delivery
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	CDBG: \$106,574
	<b>Description</b>	This activity is for staff costs associated with the housing rehab programs funded with CDBG. It is designed to ensure that the housing rehabilitation activities are properly inspected and administered. This project's outcome indicators will be reported in the Roof Housing Rehabilitation Program.
	<b>Target Date</b>	12/31/2015
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This activity provides housing inspections and other housing services for housing rehabilitation activities. Number of families will be reported in Roof Housing Rehabilitation Program.
	<b>Location Description</b>	City-wide.
	<b>Planned Activities</b>	This activity is for staff costs associated with the housing rehab programs funded with CDBG. It is designed to ensure that the housing rehabilitation activities are properly inspected and administered. This project's outcome indicators will be reported in the Roof Housing Rehabilitation Program.
<b>10</b>	<b>Project Name</b>	ADA Ramps
	<b>Target Area</b>	CDBG Target Area

<b>Goals Supported</b>	ADA Ramp Program
<b>Needs Addressed</b>	Public Improvements and Infrastructure
<b>Funding</b>	CDBG: \$200,000
<b>Description</b>	This activity will install ADA ramps at intersections and other pedestrian crossing areas. Please note that the activity is city-wide, but may include the geographic area noted below.
<b>Target Date</b>	12/31/2015
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 2000 people will benefit with handicap accessible pedestrian facilities.
<b>Location Description</b>	City-wide
<b>Planned Activities</b>	This activity will install ADA ramps at intersections and other areas to improve and provide safe pedestrian movement, especially for those with a physical impairment.

## **AP-50 Geographic Distribution – 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

The CDBG Target Area includes Census Tracts (CT) and Block Groups (BG) where at least 51% of the resident households have reported incomes that are 80% or below the area median income. This information is published by HUD and uses the statistical information identified in the 2006-2010 American Community Survey (ACS) (per Notice CPD 14-11). The CDBG Target Area is also referred to as Peoria's Low Income Area. This area is in the older sections of the City of Peoria, generally south of Gift Avenue.

The CDBG Target Area includes the following Census Tracts (CT) and Block Groups (BG): CT 1; CT 2 BG 1,2,3; CT 3 BG 1,2,3; CT 5 BG 1,2,3; CT 6 BG 1,2,3,4; CT 7 BG 1,2; CT 8, BG 1; CT 9 BG 1,2,3; CT 12 BG 1,2; CT 13, BG 1; CT 15 BG 1,2; CT 16 BG 1,2; CT 18, BG 1,2,3; CT 19, BG 1,2,3; CT 21 BG 1,2,3,4,5,6; CT 22 BG 3; CT 24 BG 3, CT 25 BG 2,4; CT 26 BG 2; and CT 27 BG 2.

In order to calculate the percentage of allocation/investment in the past, staff included the expenditures from the CDBG and HOME grants that were invested specifically into real property located in the Target Area. This included activities for demolition/clearance, housing rehab programs, CHDO new construction and rental rehab programs. In 2015, the City will also include the costs associated with the Code Enforcement activity in the CDBG Target Area. This activity will include staff costs, but as a result of the inspections and enforcement, improvements will be made to real property located in the CDBG Target Area. Additionally, inspectors will be limited to only working in the Target Areas. Allocations for administration, public service, housing delivery and ESG costs were excluded from the calculation of the percentage as these expenditures are not specifically invested into real property.

## Geographic Distribution

Target Area	Percentage of Funds
CDBG Target Area	70

Table 10 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

The basis for giving priority to the allocation of investments geographically to the CDBG Target Area is to utilize available resources that address priority needs that will have a desired, and, when possible, measurable positive impact in the area where there is the most need.

### Discussion

The rationale for geographic targeting is to use entitlement funds in an area where there is the most need and the most eligible residents in need, thereby having a concentrated impact.

## Affordable Housing

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

#### Introduction

The 2015 Annual Action Plan will address affordable housing for homeless, non-homeless and special needs households through the creation of new units, rehabilitation of existing units and short-term/medium term rental assistance.

One Year Goals for the Number of Households to be Supported	
Homeless	10
Non-Homeless	19
Special-Needs	2
Total	31

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	10
The Production of New Units	6
Rehab of Existing Units	15
Acquisition of Existing Units	0
Total	31

Table 12 - One Year Goals for Affordable Housing by Support Type

#### Discussion

The number of households to be supported as identified above include the following 2015 Annual Action Plan projects:

##### Rental Assistance:

ESG Rapid Rehousing Assistance – 10

##### Production of New Units:

Focus Area New Construction - Owner 1,

Focus Area New Construction - Rental 2, CHDO New Construction - 3

##### Rehab of Existing Units:

Housing Rehabilitation Program 14, Focus Area Rehabilitation 1.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The City of Peoria will continue to support the Peoria Housing Authority in developing plans for Taft Homes, Harrison Homes, and other affordable housing projects.

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

The City of Peoria will continue to support the PHA in developing plans for Taft Homes, Harrison Homes, and other affordable housing projects. Affordable housing initiatives will endeavor to provide a range of housing choice options for low-income families and incorporate mixed-income and/or mixed-use as appropriate for the location. PHA is committed to the preservation of quality affordable housing in its service area and to the creation and delivery of self-sufficiency resources to help improve quality of life. Some of these services are provided directly through HUD funded Family Self-Sufficiency (FSS) Coordinators but also through LISC AmeriCorps and Access to Resource and Referral Opportunities (ARRO). Direct services include programming, mentoring, coaching, and soft skills training. An elderly and disabled service coordinator is also on staff to serve primarily residents at Sterling Towers. Many public services are utilized by PHA residents and participants. PHA plans to disposition three scattered site units with appropriate reviews and approvals. Increasing Section 8 utilization is a priority goal for 2015, and PHA intends to review opportunities for increasing landlord participation, particularly in areas where there are not concentrations of poverty.

The City of Peoria has no funded projects that will specifically address the needs of public housing residents.

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

The PHA continues its efforts to engage residents in management through resident councils and committees and then plans for the recreation of a Resident Advisory Board. Two asset management properties currently have active resident councils: Sterling Towers and Taft Homes. Harrison Homes has a board recognized resident council, but the council is inactive. Monthly resident meetings continue at Taft Homes to provide opportunities for feedback and reporting in relation to development initiatives. There is a core group of residents who continue to attend monthly, and they have communicated a desire to have multiple housing options. Some residents are concerned with having to obtain utilities in their own name, and PHA recognizes this could become a barrier for relocation. Taft Homes and Harrison Homes are

the last two properties for which utilities are master metered and owned by the PHA. ARRO and the PHA AmeriCorps program services supplement the FSS program and are resources for residents to prepare for utility placement. In addition, PHA collaborates with METEC and the new Financial Opportunity Center (FOC) to provide financial literacy services and homeownership counseling for families in public housing.

The AmeriCorps service members are focused specifically on employment skills, coaching, training, and job referrals to facilitate the outcome of obtaining employment for families who reside at Taft Homes, Harrison Homes, and Scattered Sites. ARRO is a resident intern program for public housing residents that provides counseling services and self-sufficiency advocacy. Both of these programs also work with families who need additional resources to improve quality of life and may help with obtaining social security, budgeting, caregiver assistance, etc. The Family Self-Sufficiency (FSS) Coordinator for public housing focuses on developing family training plans with goals related to creating economic independence and increasing family wealth through employment, education, and financial literacy. There are homeownership goals for public housing that are related specifically to providing homeownership education services with purchasing a home as a long-term goal.

For Section 8 participants, the FSS Coordinator provides family self-sufficiency services focused on personal wealth management that would increase their ability to have funds for down payment and to have resources that facilitate homeownership. The program then assists with both preparation for homeownership and sustainability. METEC is the primary partner for homeownership counseling. The FSS Coordinator reports doubling the number of families that are utilizing the Section 8 homeownership voucher for the program. Local agencies provide support through the Program Coordinating Committee as well.

Access to financial resources and increasing family wealth will continue to be a priority for all support programs and services for public housing and Section 8.

Residents at Taft report that the community would benefit from additional homeownership down-payment assistance, particularly for veterans and people with disabilities.

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

PHA was designated as troubled for FYE 2012 and will be working with the Chicago HUD Field Office on a recovery action plan to ensure long term sustainability of operations for public housing. In FY 2013, the PHA was a standard performer except under the management indicator in which they were designated substandard. Sixteen (16) out of the possible twenty-

five (25) points for the management indicator are related to occupancy. Unit turnaround time has been the primary barrier. The City of Peoria is not actively providing assistance to help the PHA with public housing performance. The Section 8 has a preliminary standard performer designation.

**Discussion**

No additional information needed.

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

### **Introduction**

The City objectives under the 2015 Annual Action Plan are to continue the priority of funding for Rapid Re-housing assistance with its ESG allocation, continue the partnership with the HOIHCOC to implement the HEARTH requirements, and encourage the advance of HMIS as data collection tool for service delivery and funding prioritization.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The City will continue to participate in the local homeless Continuum of Care Point-in-Time Count and Street Sweep. The City will require a formerly homeless or currently homeless individual to participate in the HOIHCOC and have input in the allocation of ESG funding to best assess the funded activities and the needed services. The City will distribute Continuum member agencies program locations, provider capacity and general referral information to its staff (including Police, Fire and 9-1-1 Center), local officials and neighborhood associations.

The City will encourage Continuum members to expand outreach with faith-based organizations and the possibility of having a formal needs survey available at these organizations' events, such as soup kitchens, food pantries and clothing donations.

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

The City plans to continue ESG funding for emergency shelters. In addition, the City will continue to work to decrease the number of people who enter and stay in emergency shelters through funding prioritization of its ESG allocation to Rapid Re-housing assistance.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The City has a Rapid Re-housing program funded with its ESG allocation. This program is designed to assist currently homeless individuals and families move from emergency shelter to permanent housing.

The City collaborates with developers interested in the creation of new permanent supportive housing or affordable housing units. City HOME funds may be allocated to this development.

In addition, the City will explore opportunities to link private landlords with social service agencies for the availability of housing. Further, the City will continue its proactive code enforcement to ensure housing units are well maintained, safe and secure and not have any deficiencies that would endanger tenants.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

The City will collaborate with the local homeless Continuum of Care to redesign the homeless prevention services and allocate only dollars, such as State or private donations, to fund homeless prevention assistance. The City and the HOIHCOC are in agreement that Federal resources should be prioritized to assist those currently homeless.

Additionally, the City will continue to assist the local homeless Continuum of Care in the design of the coordinated/centralized intake system to ensure those individuals with the greatest need are identified and appropriate referrals are made to available services immediately.

## **Discussion**

There is no additional information to be provided.

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

### **Introduction**

Taxes, land use control and building codes can have a negative effect on affordable housing and residential investment. The City has no taxing policies that would negatively impact the development of affordable housing or residential investment. Housing taxes are based solely on the assessed value of the property and are determined by the Peoria County Assessor's Office. Land use controls include zoning, subdivision and building codes. The Land Development Code (LDC) requires residential design elements that could increase development costs in older neighborhoods of the City. The LDC covers a majority of the CDBG Target Area. Building Code requirements and fees are uniform to all types of residential development and present no barriers to affordable housing or residential development, in fact in some circumstances the City's fees are considerably lower than those assessed by surrounding communities. Affordable housing developments frequently obtain subsidies from the City and environmental clearance assistance when federal funds are involved. There are no fees, charges, growth limits, or other policies that affect the return on residential investment. Land costs, especially vacant land held by the Peoria County Trustee, are reasonable and feasible for development. The City has no impact fees imposed on developers to pay for all or a portion of the costs of providing public services to a new development.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

The introduction summary listed above does identify one issue, the applicability of the Land Development Code (LDC) that could negatively affect affordable housing development in the City. The LDC requires in-fill, new construction development to be consistent with the current character of an existing street or block. The LDC could increase design and construction costs in order to meet the design standards. The City will monitor affordable housing projects as they come to the City and may provide financial and/or other support for appropriate projects.

### **Discussion**

No additional narrative is needed.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction**

The City's planned actions in this section are to promote the coordination of services among providers, seek and support the pursuit of additional funding to address underserved needs, and reduce the number of households in poverty through various services.

### **Actions planned to address obstacles to meeting underserved needs**

Obstacles include insufficient funding to meet a variety of community needs, available land throughout the City for in-fill, new construction and a need for enhanced coordination of services. To resolve these issues, the City will continue to investigate new funding opportunities and engage the public and other community stakeholders to identify and prioritize needs. Through this public engagement, the City will also assist in identifying if a service is being offered by another community organization and how best to collaborate with the available resources. The City will continue to obtain property through the abandon property process associated with the demo court process, in which a court order deed including a demo order is issued to the City when a property is declared by the courts as abandoned. The City will work with developers to identify a plan to best use the acquired property.

### **Actions planned to foster and maintain affordable housing**

The City's housing rehabilitation programs serve to maintain and foster affordable housing. Details of the housing rehabilitation programs can be found in the Plan under section 20-Annual Goals as well as section 38-Projects Summary Information.

Multi-family, rental developments that have been funded with the City's HOME allocation are monitored annually to ensure that the developments are following ongoing affordability requirements and are maintained. The summary of each year's monitoring results are reported in the City's Consolidated Annual Performance Evaluation Report (CAPER).

The City will also support the following actions in 2015 to foster and maintain affordable housing:

- Allocate funding to Community Housing Development Organizations to develop affordable housing
- Allocate ESG funding to provide housing assistance for homeless individuals and families
- Continue the partnership with Peoria Housing Authority
- Continue the partnership with the Heart of Illinois Homeless Continuum of Care
- Support the programming for Money Smart Week in partnership with the Chicago Federal Reserve and local lenders
- Partner with IHDA to promote down payment assistance programs available in Peoria area through certified IHDA lenders

Through these actions, the City will continue to strengthen community interest and support to develop affordable housing. Additionally, the City has not identified affordable housing units that may be lost from the assisted housing inventory in 2015. If such units are later identified, the City will provide support in efforts to keep or replace these housing units.

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

Lead based paint hazards have been well documented in Peoria County. In 2014, the City allocated \$50,000 to the Peoria City/County Department of Health (PCCDH) to be used as matching funds for the PCCDH lead abatement/removal grant. Unfortunately, the PCCDH was not awarded funds from the lead abatement/removal application in which the CDBG funds were to be used as match. PCCDH intends to reapply in 2015 and the City will continue to reserve its 2014 match commitment for the new application. Additionally in 2014, the City reopened that paint program for owner occupied households in the first Council District – the majority of this District is located in the CDBG Target Area / Low Income Area of the City. This program provides paint vouchers to be used by homeowners to repaint their properties. This program is funded with local funds – not Federal grant dollars. Additionally, this program is not a lead based paint removal program. However, the paint vouchers supplied to homeowners offset the cost of purchasing paint and provides an opportunity to repaint the exterior of their home to mitigate code violations and improve the façade.

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

The City of Peoria will use a multi-faceted approach toward reducing the number of poverty level families in 2015. CDBG funds are being targeted for housing rehabilitation and public services, and Emergency Solutions Grant funds will be used for homeless rapid re-housing and other services to bring families out of homelessness. These funds will assist low income families find suitable housing or remain in their homes without using their limited funds for repairs, and provide public services and other programs that directly assist families move out of poverty.

The City of Peoria poverty reducing goals, programs and policies are coordinated primarily through its Human Resources Commission, which coordinates the CDBG public service funding process; the Heart of Illinois Homeless Continuum of Care, which coordinates homeless goals, programs, and policies in the four county Peoria area; and through relationships with area social service and faith based organizations.

### **Actions planned to develop institutional structure**

The City has an extensive institutional structure in place used to implement the 2015 Annual Action Plan. The Department of Community Development, Grants Management Division, is charged with the responsibility of managing all HUD funds received by the City and to take the lead role in coordinating activities with outside agencies. In 2014, the Community Development Department, Grants Division, absorbed the administration of the City's current Youthbuild grant. The \$1.1 million dollar grant was awarded by the US Department of Labor in 2012 under the City's Workforce Development Department. As a part of the City's strategic planning, the Workforce Development Department was eliminated and the Youthbuild grant and staff were reassigned to the City's Community Development Department. YouthBuild is a community-based alternative education program that provides job training and educational opportunities for at-risk youth ages 16-24. Youth learn construction skills while constructing or rehabilitating affordable housing for low-income or homeless families in their own neighborhoods. Staff continues to explore the integration possibilities of the Youthbuild grant with the programs and services funded with HUD dollars.

The actions planned to address gaps and weaknesses in the institutional structure will be accomplished in 2015 through twice a year meetings among affordable housing providers, enhanced participation of homeless and mental health providers in the Heart of Illinois Homeless Continuum of Care, the City's continuing collaboration with the Tri-County Regional Planning Commission's programs for revitalizing the region, and through meetings with private business developers to discuss potential programs and projects.

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

Actions that will take place in 2015 to enhance coordination between housing and social service providers will include encouraging collaboration in the coordination of services for homeless and near homeless person through the Heart of Illinois Homeless Continuum of Care, and continued funding of CDBG public services that show the coordination of services with other agencies. Housing services in the East Bluff neighborhood are planned to be coordinated in 2015 with Peoria LISC – Local Initiatives Support Coalition, the City, Peoria Opportunities, East Bluff Neighborhood Housing Services, Illinois Facilities Fund and the real estate community. The PHA's housing plans will be coordinated with the City plans and codes.

### **Discussion**

No additional narrative is needed.

## Program Specific Requirements

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

#### Introduction

The City must select a consecutive period of one, two or three years that will be used to determine that a minimum overall benefit of 70% of CDBG funds was used to benefit low-income persons/households. The City has selected a three year benefit period, which is for program years 2014, 2015, and 2016. The 2015 Annual Action Plan covers the second year of this three year period. The CDBG program has no program income available at the start of the 2015 program year. The City's HOME program will utilize both resale and recapture provisions further described below.

The City is hereby declaring that it may utilize CDBG entitlement funds for urgent needs activities if an eligible emergency occurs and the City Council approves such use of CDBG funds.

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

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

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

#### Other CDBG Requirements

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

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**HOME Investment Partnership Program (HOME)**  
**Reference 24 CFR 91.220(l)(2)**

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

There are no other forms of investment being used. HOME Investment Partnership funds will be used as a grant to its Community Housing Development Organizations (CHDO) and a forgivable loan or grant to its Focused Area Housing Program recipients.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City has adopted a Resale/Recapture Policy based on the guidance found at 24 CFR 92.254. Please refer to attachment labeled HOME Resale and Recapture Policy (Image Sequence #16). Also, please refer to question number #3 for additional narrative.

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

The City has adopted a Resale/Recapture Policy based on the guidance found at 24 CFR 92.254. For HOME funded homebuyer activities, in order to secure the required HOME Affordability Period, the Homebuyer and City will execute a written agreement that includes all the terms and conditions of the HOME assistance. Additionally, a Notice of Use Restriction (Deed Restriction) will be recorded against the property to further secure the HOME Affordability Period and requirements contained within the written agreement.

The City will continue monitoring of the HOME Affordability Period by annual certification of residence and ownership mailed to the property address. The letter will contain a certification of compliance with the HOME Affordability Period detailed in the written agreement and Notice of Use Restriction (Deed Restriction) with a Do Not Forward label on the mailing address envelope.

Further, the City will select a random sample of previous activities within an active HOME Affordability Period to conduct further monitoring compliance. Within the sample, City staff will investigate property tax information, utility billing information and field inspections to determine residency and ownership compliance. For additional information regarding the resale and recapture guidelines, please refer to attachment labeled HOME Resale and Recapture Policy.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

There are no plans to use HOME funds to refinance any existing debt.

**Emergency Solutions Grant (ESG)**  
**Reference 91.220(l)(4)**

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

In conjunction with the City and the HOIHCOC, the development of ESG written standards were created to provide an agreed upon procedural guideline for program implementation in the City and through the HOIHCOC member agencies. The written standards should not be seen as an alternative to or replacement of HUD rules and guidance. The standards provide a framework through which ESG funds will be used in the City.

Specifically, ESG providers agree to follow procedures for screening, assessment, application and service provision to make certain that households meet the eligibility criteria of the program, to eliminate duplication, and to ensure seamless homeless prevention coverage. All ESG providers must enter client and service level data into the HOIHCOC HMIS system in accordance with HUD rules, operating standards set by the HOIHCOC, and confidentiality laws.

Accompanied with the City's 2015 Annual Action Plan, ESG written standards for providing ESG assistance will be submitted to HUD.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Currently the HOIHCOC is in the development of the centralized or coordinated assessment system. The HOIHCOC has assigned a specific task group to plan, organize and determine that appropriate assessment tool and functionality of such a system in the HOIHCOC service area. Once a system is in place, the City will require all funded and future funded agencies to follow and participate in the created system.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

ESG regulations require the City to collaborate with the HOIHCOC to conduct needs assessment, develop policies and procedures for service delivery and discuss funding allocation in order to provide the most comprehensive system for the homeless and at-risk population. The City recognizes that its ESG program is closely linked to the HOIHCOC and has requested that the HOIHCOC conduct the 2015 ESG application and funding allocation process with City staff oversight. The HOIHCOC has accepted this request and will submit a collaborative application to the City. The HOIHCOC will work with its member agencies to identify service priorities, provider capabilities to comply with ESG regulations, funding allocations for grant awards and make final recommendations. This process will be very team orientated and required communication between service providers on how to best allocate funds for the most needed services. This application process began with the

2014 funding year. The HOIHCOC's ESG City of Peoria 2015 funding recommendation will be forwarded to the City for City Council final action.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The HOIHCOC Governing Board meets the homeless participation requirements in 24 CFR 576.405 (a) by holding a Board Member position for a current or formerly homeless individual.

5. Describe performance standards for evaluating ESG.

Each ESG subrecipient identifies the performance standards to be used in its ESG funded activities. These performance standards are included as a part of the funding application and stated in the City's subrecipient agreements.

City staff reviews each application for funding to determine if the performance standards submitted are reasonable with the amount of funds being requested and is a standard that can be objectively measured.

ESG subrecipients submit request for reimbursements and performance reports to the City on a quarterly basis. Staff ensures that the funds being requested correspond to the performance standards accomplishments for the quarter. City staff on-site monitoring is also completed for each ESG funded activities.

**ESG Policies and Procedures are attached below.**



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Emergency Solutions Grant (ESG)  
Policies and Procedures

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**ESG Policies and Procedures 1**

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The intent of this document is to provide a framework through which ESG funds will be used in the City of Peoria. This document provides a summary of HUD ESG rules and agreed upon procedural guidelines for program implementation in the City and provided by member agencies of the Heart of Illinois Homeless Continuum of Care (HOIHCOOC).

This document, in no manner, should be seen as an alternative to or replacement of HUD rules and guidance. More information can be found at [www.hudhre.info](http://www.hudhre.info)

#### I. CONSISTENT PROCEDURES AND PRACTICES:

ESG providers agree to follow procedures for screening, assessment, application and service provision to make certain that households meet the eligibility criteria of the program, to eliminate duplication, and to ensure seamless homeless prevention coverage in the county. All ESG providers must enter client and service level data into the Heart of Illinois Homeless Continuum of Care (HOIHCOOC) HMIS system in accordance with HUD rules, operating standards set by the HOIHCOOC and confidentiality laws.

The ESG Interim Rule provided four possible categories under which individuals and families may qualify as homeless, corresponding to the broad categories established by the statutory language of the definition in section 103 of the McKinney-Vento Act, as amended by the HEARTH Act.

Projects must serve clients that qualify as Homeless (HUD definition at 24 CFR Part 91 or At-Risk of Homelessness (HUD definition at 24 CFR Part 576). The categories are:

- (1) Literally Homeless;
- (2) Imminent Risk of Homelessness;
- (3) Homeless under other Federal statutes; and
- (4) Individuals and families who are fleeing, or are attempting to flee domestic violence.

#### II. COORDINATION OF SERVICES:

ESG Providers will work with member agencies of the HOIHCOOC to utilize a universal brief screening tool to be used to identify consumers who are appropriate to access funds and supportive services through ESG.

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

***Eligible applicants must live within the City of Peoria, meet income guidelines, and be homeless but for the ESG assistance.***

### III. PREVENTION OF HOMELESSNESS THROUGH THE ESG PROGRAM:

Prevention assistance to households under the ESG Program is intended to have a meaningful impact on homelessness and housing stability for participating households.

ESG provides a variety of supports (*See Eligible Supports*) to achieve the following three assistive elements: preventing people from homelessness; diverting people who are applying for shelter into other housing; and helping people who become homeless to quickly return to permanent housing. ESG consists of a Rapid Re-housing component for those who are currently homeless and a Homeless Prevention component for those at risk of becoming homeless. Eligible households include people with very low incomes (below 30% of the Area Median Income AMI), who lack resources for housing and who are homeless or would be homeless *but for this assistance*.

Participating households must agree to allow household demographic and service information to be shared through the HOIHCOC Homeless Management Information System (HMIS), (*See Confidentiality & HMIS Standards*), must complete a case management assessment and must develop and participate in case management and life skills support from a provider agency.

The HOIHCOC will target households that have a demonstrated housing crisis, that meet one or more risk factor and that are likely to remain stably housed after this assistance.

Eligibility may be re-assessed every 30 days for all participating households (*See Eligibility Criteria & Risk Factors*). Households receiving any type of rent assistance under this program must reside or plan to reside in an eligible unit (*See Eligible Units*). ESG is not a mortgage assistance program and it is not intended to serve persons who need long-term and or intensive supports.

Maximum forward assistance under this program is 3 months and may be extended with approval of the supervisor.

### IV. ELIGIBLE SUPPORT FOR HOMELESS PREVENTION & RAPID RE-HOUSING

Supports provided by provider agencies are intentionally focused on housing – either financial assistance to help pay for housing, or services designed to keep people in housing or to find housing. ESG provider agencies should be prepared to develop a clear process for determining the type, duration and level of assistance available for each participating household.

#### Financial Assistance

- Rent arrearage (up to 6 months)\*\*
- Short-term rent assistance (up to 3 months)\*\*
- Security Deposits (max 2 months rent)
- Utility Deposits
- Utility Arrearages (up to 6 months)

#### Housing Relocation and Stabilization Services

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- Case Management
- Housing Search and Placement

\* The HOIHCOG ESG providers have agreed to limit short-term rent assistance to a maximum of 3 months.

V. PROCEDURAL GUIDELINES FOR ESG ASSISTANCE

- The HOIHCOG ESG provider agencies will only provide assistance to households residing in, homeless within or moving to Peoria, Tazewell, Woodford, and Fulton Counties.
- ESG assistance cannot be provided to eligible individuals or families for the same period of time and for the same cost types that are being provided through another federal, state, or local housing subsidy program.
- There are four cost types: rent payments (client portion or the subsidy), security deposits, utility deposits, and utility payments. So, if a participant is receiving rental assistance under another program, ESG funds may not be used for rental assistance during that same time period.
- Funding could be used to pay for another cost type such as security deposit or utility payments. For example, a homeless veteran entering a HUD-VASH project may receive security deposit assistance through ESG funds.
- For households who have the Section 8 Housing Choice Voucher, assistance should be provided through existing HPP funds such as IDHS before utilizing ESG funds, document rent amount and that the unit has passed inspection before any assistance is approved.
- When providing rental assistance and security deposit, the lease must be in the client's name and signed by the tenant and the landlord. The assistance (voucher and payment) is made to the property owner/property complex only, and is not to exceed the amount owed to the owner for rent and/or security deposit.
- Security Deposits are to be used for permanent housing only. Clients that are moving into a halfway house or need "program fees" are not eligible.
- ESG agencies will only provide the equivalent of 2 months' rent maximum for security deposit to eligible households. Exceptions will only be made for good cause, such as proven bad credit, which prevents the household and the ESG agency from locating an appropriate alternative unit.
- When providing rental arrearage assistance the ESG agency must ensure and document that the payment will enable the eligible household to remain in the housing unit for which the arrears are being paid or enable the household to move to another unit.

- ESG agencies will only provide eligible individuals or households with up to 6 months of arrears, provided that the client or a member of his/her household has an account in his/her name with a utility company. ESG funds can only be utilized for provision of gas, electric, water, and sewer services, not phone or cable.
- Financial assistance is provided in voucher form only and no payments are made directly to participating households.
- ESG providers must track ESG services separately from other funds. Likewise, services provided under the components of Homeless Prevention and Rapid Re-housing must be tracked independent of each other. Finally, ESG funds provided via the State of Illinois must be tracked separately from ESG funds provided by the City of Peoria.

#### VI. ELIGIBILITY CRITERIA

All households must be reassessed for eligibility on a quarterly basis. Households which do not meet all eligibility criteria are not eligible to receive any ESG services - including financial assistance and housing relocation and stabilization services. Households may become ineligible for ESG services if they do not meet the terms of the Recovery Plan at any point as determined by the ESG provider. (*See Separation Guidelines*)

#### *HUD Guidelines:*

- Household must be at or below 30% of the HUD Area Median Income (AMI) guidelines (*see [www.huduser.org/DATASETS/il.html](http://www.huduser.org/DATASETS/il.html)* );
- Must have no subsequent housing options identified but for this assistance;
- Must lack financial resources or support network to obtain and sustain housing but for this assistance;
- Agrees to allow household information to be shared via the HMIS reporting system, ESG funding recipients must be entered into HMIS for reporting requirements (unless exempted by law);
- Must complete a comprehensive assessment of needs matrix, a goal sheet, and the universal service plan for housing stabilization;
- ESG funding recipients must be willing to create and engage in services, goal-setting, and case management as needed to acquire and maintain stable housing (independent of this assistance within a defined time period not to exceed 12 months);
- If receiving assistance with utility deposit or utility arrearage, household must show valid disconnect notice or proof that utilities will not be connected without assistance. As with all activities under ESG, assistance must be sought first from other resources (LIHEAP);
- If receiving short term rent assistance, the household must be living in or planning to move to a residence which meets HUD's Rent Reasonableness Standard and quality housing standards. (*See Eligible Units*);

- If receiving any services through the Rapid Re-housing component of ESG, household must be homeless according to the following criteria as defined by section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302):
- The proposed rule, submitted for public comment, provided four possible categories under which individuals and families may qualify as homeless, corresponding to the broad categories established by the statutory language of the definition in section 103 of the McKinney-Vento Act, as amended by the HEARTH Act. Projects must serve clients that qualify as Homeless (HUD definition at 24 CFR Part 91 or At-Risk of Homelessness (HUD definition at 24 CFR Part 576) The final rule maintains these four categories. The categories are:
  - (1) Individuals and families who lack a fixed, regular, and adequate nighttime residence and includes a subset for an individual who resided in an emergency shelter or a place not meant for human habitation and who is exiting an institution where he or she temporarily resided;
  - (2) individuals and families who will imminently lose their primary nighttime residence;
  - (3) unaccompanied youth and families with children and youth who are defined as homeless under other federal statutes who do not otherwise qualify as homeless under this definition; and
  - (4) individuals and families who are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member. Throughout this preamble, all references to a number “category of homeless’ refer to this list.

*Process Notes:*

Upon identification, eligible applicants must complete an intake and assessment process with one of the ESG provider agencies.

As part of the intake process, all applicants will complete an income eligibility review. This is discussed in more detail in a later section of the manual.

Case managers from each agency will meet on a weekly basis to review these assessments and identify those that are selected for assistance. At time of identification, the ESG agencies will also assign participants to the appropriate agency for case management/assistance based upon their specific needs.

A review of client eligibility will be completed every 30 days during participation in the program to ensure ongoing eligibility for assistance.

See the Forms section of this manual for hard copies of all forms used by the program.

VII. TARGETED HOUSEHOLDS

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A. RISK FACTORS FOR HOMELESS PREVENTION AND RAPID RE-HOUSING

The HOIHCOC ESG providers will target households to serve those who are most in need of this temporary assistance and most likely to achieve stable housing outside ESG. In addition to meeting all eligibility criteria, households will meet one or more of the risk factors as outlined below and have access to or potential for obtaining resources necessary to gain family self-sufficiency. It is expected that many of the households served will be at risk of homelessness due to the economic crisis.

- The household must be able to document a drop in income, severe housing cost burden, mental or physical illness or disability or other significant life changing event that limits their ability to maintain housing *but for this assistance*. Examples may include:
  - Experiencing short-term economic crisis due to sudden drop in income/increase in expenses
    - unemployment/ low-income
      - Individuals who are unemployed or underemployed or whose families income is insufficient to meet their housing costs and have already lost their housing
      - Formerly dual income households where one member is unemployed so there is not enough income to meet their housing costs
      - Unemployed persons who receive unemployment benefits but the benefit is insufficient to meet their housing costs
    - Extended medical leave/disability
    - Experiencing severe housing cost burden (greater than 50% of income for housing costs)
    - Extremely low income (less than 30% of AMI)
  - Currently residing in precarious or unsuitable housing
    - Family residing in a hotel
    - Periodic residency in multiple shelters but gainfully employed
    - Unable to reside in current unit for medical or safety reasons, (for example, client has medical documentation from a doctor stating that he/she must move due to a medical condition that cannot be accommodated or which is worsened by the household's current residence).
    - Discharge within 2 weeks from an institution in which the person has been a resident for more than 180 days (including prisons, mental health institutions, and hospitals)
  - Change in family composition
    - Change in household composition which puts the household over occupancy for the unit (the number of persons exceeds health and/or safety standards)
    - Loss of the household's primary financial provider
  - Eviction/foreclosure
    - Pending foreclosure of rental housing

- Persons experiencing eviction within 2 weeks (including housing provided by family or friends if the housing is no longer an option for them)
- Unable to reside in current unit for other reasons outside the client's control
  - Client's landlord has sold the building and it is no longer an option to lease there; Landlord refused to rent to client for any reason;
- Persons with residency in housing that has been condemned or deemed uninhabitable by the appropriate authority
- Personal foreclosure, short-sale
- Victims of violent crime, domestic violence or natural disaster
- Barriers complicating housing
  - Persons experiencing mental health, physical disabilities, & substance abuse issues that are a barrier to household income and housing
  - Persons previously experiencing homelessness within the last 12 months
  - Single expectant mothers
  - Persons experiencing significant life changing event such as past institutional care, trauma, credit problems, or medical debt that limits their ability to maintain housing

B. NON-DUPLICATION

*HUD Guidelines*

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

C. NON-SELECTION/NON-CONTINUATION (INITIAL/CONTINUING ELIGIBILITY)

*Procedural Guidelines:*

The ESG agency will make decisions regarding non-selection for participation in ESG at initial application or at recertification due to any of the reasons defined below. Criteria apply to both initial application and at time of quarterly reassessment.

Please note: Violent or drug related criminal activity related to a household receiving any type of rental assistance is grounds for immediate termination. Likewise, misrepresentation of eligibility by any household also provides reason for immediate separation from any program assistance.

- Household does not meet all eligibility criteria: Or
- Household does not complete all steps to establish eligibility in a timely manner: Or
- Misuse of program services by any household member; Or
- Household does not complete or refuses to engage in Recovery Plan objectives: Or
- Household non-readiness, as determined by the ESG providing agency, due to:

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- Lack of “key” services from service providers in the community or an unwillingness/inability by the household to link to such key services; And/or
- Household’s misuse of resources, including personal resources such as income and benefits

Key resources are those resources or services that are integral to the household’s ability to achieve self-sufficiency.  
Self-Sufficiency is defined as the household’s ability to maintain rent and household expenses independent of the ESG within a defined period of time.

- At the discretion of the ESG providing agency, based on the household’s use of current and past agency services - Including but not limited to: a review of the client’s previous participation in similar agency services, such as homeless prevention services, short-term case management or some equivalent data.

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

#### VIII. SEPARATION GUIDELINES

##### *Procedural Guidelines-*

All assistance provided under ESG is subject to eligibility requirements and program guidelines. Final decisions regarding non-selection/non-continuation will be relayed in writing, to the household, by the ESG providing agency. The ESG agency will provide, when appropriate, information about helpful outside resources and the opportunity to re-apply to the program or to enter the program at a later date.

A formal separation process will, at a minimum, consist of the following:

- Written notice which includes date of termination, reason for termination, opportunity for appeal, and, if appropriate, any helpful resources to assist the participating household to maintain housing stability.
- Opportunity to appeal – Participating households which are selected for non-continuation are entitled to request a review of the decision with the opportunity to present oral or written objections before a person other than the person (or a subordinate of the person) who made or approved the termination decision. Final decisions regarding the appeal will be provided in writing.

#### IX. ELIGIBLE UNITS

Information regarding conflicts of interest, Nondiscrimination and Equal Opportunity Requirements and Fair Housing and Civil Rights laws are in effect.

A. RENT REASONABLENESS STANDARD

Rental assistance must comply with HUD's rent reasonableness standard, meaning the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private, unassisted market and must not be in excess of rents being charged by the owner for comparable non-luxury unassisted units.

*Process Guidelines:*

Comparable review can also be checked by:

- Using a market study, or
- Reviewing comparable units advertised for rent
- Written verification from the property owner of comparability of rent charged with other units owned.
- 

The ESG providing agency should consider the following when determining rent reasonable:

- The location, quality, age, size, and type of the unit
- Any amenities, services and utilities to be provided by the owner

Visit [www.hud.gov/offices/cpd/affordablehousing/library/forms/rentreasonablechecklist.doc](http://www.hud.gov/offices/cpd/affordablehousing/library/forms/rentreasonablechecklist.doc) for more information.

B. HABITABILITY STANDARD

*HUD Guidelines:*

ESG agencies will be required to conduct initial and any appropriate follow-up inspections of housing units if the participating household receives security deposit or short-term or medium-term rent assistance. Additional information can be found in Appendix C of the ESG notice dated March 10, 2009.

- For households with children 6 and younger, a visual inspection for lead based paint
- For all household's moving into a unit, a full inspection of a unit and additional annual inspections if assistance exceeds 12 months.

*Process Guidelines:*

The CoC has determined that it will conduct both a lead-based paint visual assessment (where required based upon age of housing unit and household make-up) and a habitability review for both Prevention and Rapid Rehousing support.

When a unit is determined to be inhabitable under the HUD standards, the agency will identify the unit as ineligible for ESG support and offer assistance to the participant in finding safe, affordable housing.

See the Forms section of this manual for hard copies of all forms used by the program.

C. LEASES

*Process Guidelines*

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

- The landlord must agree to work with the ESG agency to accept voucher rent payment and to stop eviction proceedings upon receipt of signed voucher.
- Households may be assisted at the end of their lease term, if a move to another housing unit is necessary in order to ensure future housing stabilization.
- Month-to-Month leases – month-to-month leases reflect transience, and should be avoided generally. The landlord needs to be engaged in working on a long term lease arrangement.
- ESG agencies must have a copy of the valid lease to assist with rent. Valid leases must include signatures of both the client and/or a member of the household and the owner, and must be dated.
  - Recipients of ESG funds must have a legal right to reside in the unit and prove responsibility for paying the rent. As a general matter, if the eligible person is not named on a valid lease/rental agreement either as a tenant or an authorized occupant, the person has no legal right to reside in the unit and is therefore not eligible for rental assistance. However, if an applicant is listed as an occupant on a lease agreement and can prove through paid receipts in their name, money orders or cancelled checks that they pay rent or utility bills, even if the accounts are in the name of another household member, it is permissible to assist the applicant. The Grantee and project sponsor have responsibility for ensuring the eligibility of each household assisted with ESG funds. The eligibility assessment would determine if the total household income would be included, or if a shared leased housing arrangement is present, therefore counting only the applicant's income. While an oral lease for less than a year may be valid in some states, most states require a written lease to establish a legal tenancy and HOPWA adopts this clear standard. This position is also consistent with other HUD rental assistance programs, which require such documentation (e.g., HOME, Shelter Plus Care, Housing Choice Vouchers/Section 8). As a practical matter, not requiring a written lease may leave grantees in a vulnerable position in documenting ESG payments during audits and reviews.
  - A sublease is considered a legal lease. However, the grantee should be sure that the relationship between the participant/grantee/sub grantee and the landlord is not in violation of the conflict of interest provisions as stated in the ESG Notice. For example, the sublease agreement should not be between relatives or other parties where there is a potential conflict of interest.

X. DETERMINING TYPE, LEVEL AND DURATION OF ASSISTANCE

HUD advises that ESG assistance should be “need-based”, meaning that providing agencies should determine the amount of assistance based on the minimum amount necessary to prevent the program participant from becoming homeless or returning to homelessness in the near future. Upon approval of supervisor and only in emergency situations can ESG assistance exceed 3 months.

RENTAL ASSISTANCE

Maximum of three months of short term rental assistance will be provided. Amount of assistance will be based on the minimum amount necessary to prevent CL from becoming or returning to homelessness.

Procedural Guidelines - To ensure a consistent application of standards in determining rent amounts to ESG participating households, ESG providers will meet on a regular basis to review compliance with ESG program requirements.

Where Rapid Rehousing assistance is indicated, maximum of three months of short term rental assistance will be provided. Amount of assistance will be based on the minimum amount necessary to prevent CL from becoming or returning to homelessness.

*HUD Guideline of eligible ESG services:*

Financial assistance

- a) Short-term
  - i) Includes arrearages, rent, and Security deposit
  - ii) Utility arrearages (6 months max) and deposit
  - iii) Up to 3 months of ongoing assistance provided

Housing Relocation & Stabilization

- a) Short-term
  - i) Housing search and placement
  - ii) Housing stability case management
  - iii) Mediation
  - iv) Legal services
  - v) Credit repair

XI. HMIS STANDARDS

A. HMIS STANDARDS

HMIS is locally administered by the HOIHCOC locally referred to as HMIS or Homeless Management Information Systems. HMIS was developed by HUD to gather and analyze data to determine the effectiveness of McKinney-Vento Act Programs. HMIS provides the ability to: develop unduplicated

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counts of clients served at the local level; analyze patterns of use of people entering and exiting the homeless system; and evaluate the effectiveness of those systems.

ALL ESG providing agencies must enter client-level data into the HOIHCOC HMIS unless prohibited by law. Baseline requirements include: Data collection; program descriptors; universal data elements; and program specific data elements. These elements are being revised for the implementation of ESG.

All ESG providing agencies must:

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

Information can be found in the following documents: *Homeless Prevention & Rapid Re-Housing Program (ESG) Quarterly Performance Reports: Elements, Response Categories and Justification; Homeless Management Information System (HMIS) Data Standards, Revised Draft Notice, April 2009; and at [www.HMIS.info](http://www.HMIS.info)*

*Process guideline:*

ESG agencies should be prepared to promptly enter client and service level data into HMIS and share information within HMIS.

The head of household for each ESG participant unit must complete a release of information agreement related to HMIS data entry.

#### B. TRACKING SERVICES AND OUTCOMES

Services and program outputs must be tracked according to HMIS standards. See *ESG Performance Measures* for more information on tracking outcomes. To ensure consistency in tracking outcomes, ESG providing agencies must track outcomes for each activity as outlined on the Performance Measurements. Changes may be made to the performance measures, if agreed upon by the ESG providing agencies.

Additional performance outcomes may be proposed by the Continuum of Care HMIS Standards Committee. Consistent HMIS data entry will increase potential for continuum-wide ESG performance.

XII. CLIENT CONFIDENTIALITY

Each ESG providing agency must implement procedures to ensure the confidentiality of records pertaining to any individual provided with assistance and that the address or location of any assisted housing will not be made public.

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**City of Peoria  
Resale and Recapture Guidelines for  
HOME Program Activities**

The City of Peoria Grants Management Division of the Community Development Department will use HOME Investment Partnerships Program funds to provide housing for low-income persons. The forms of funding used to assist homebuyers and/or developers include: down payment assistance, development subsidies, or some combination of these methods. The City of Peoria Grants Management Division will use the Recapture method of insuring affordability for all homebuyer activities in which direct HOME funds assistance is provided. The City of Peoria Grants Management Division will use the Resale provision of insuring affordability when direct HOME funds assistance is not provided. Only one method shall be utilized for each project, the Recapture method is only allowed when there is direct HOME funds assistance provided.

***Recapture Provisions***

Subject to recapture are the HOME funds that are invested in a HOME assisted unit, as a direct subsidy to the homebuyer. The subsidy could include down payment assistance and the amount of each subsidy would be a minimum of \$1,000 and differ per each homebuyer. The minimum length of affordability is based on the total direct HOME funds assistance provided:

**Affordability Requirements for the HOME Program**

Total direct HOME subsidy to the buyer, per unit	Minimum period of Affordability
Less than \$15,000	5 Years
\$15,000 to \$40,000	10 Years
More than \$40,000	15 Years

The period of affordability shall commence from the date the activity is identified as “completed” in HUD’s Integrated Disbursement Information System (IDIS).

The Recapture Provisions are as follows:

- The Affordability Period shall be based on the total direct HOME subsidy to the homebuyer and does not take into account a development subsidy provided on the unit.
- The buyer must be purchasing the home to use as a principal residence. In other words, the buyer must intend to live in the home for the entire affordability period and not be buying the home for any other purpose, such as investment or rental property.
- Enforcement Mechanisms – Recapture provisions shall be detailed within each program written agreement between the homebuyer and the City of Peoria and enforced through a Notice of Use Restriction filed with the Peoria County Recorder’s Office.
- The requirements within shall be triggered upon sale or transfer of the HOME assisted property. As listed below:
  - In the event of a sale, conveyance or other transfer of the property, excluding any one or more of the following (each, a “Permitted Transfer”): any sale, conveyance or transfer

(A) to a spouse upon a dissolution of marriage, (B) to the surviving spouse upon the death of a joint tenant Owner, (C) by will, or (D) upon foreclosure or deed in lieu of foreclosure, provided however that there are no Net Proceeds from the foreclosure or deed in lieu of foreclosure or that the City has received all or a portion of the funds from the Net Proceeds from the foreclosure or deed in lieu of foreclosure, then the City shall receive a portion of the funds from the Net Proceeds.

- The City will reduce the HOME investment amount to be recaptured from the Net Proceeds on a prorated basis for the time the Homeowner has owned and occupied the housing measured against the remaining years in the required Affordability Period. The prorated basis is as follows:
  - First Year - 90% of HOME investment from available Net Proceeds
  - Second Year - 70% of HOME investment from available Net Proceeds
  - Third Year - 50% of HOME investment from available Net Proceeds
  - Fourth Year - 30% of HOME investment from available Net Proceeds
  - Fifth Year - 10% of HOME investment from available Net Proceeds
- The amount of recapture funds are subject to the availability of Net Proceeds available from the resale of the property. The term "Net Proceeds" shall mean the proceeds as indicated upon a closing settlement statement of the net amount to be paid to the seller. In the event that no such statement exists, "Net Proceeds" shall mean the amount equal to the sales price (X) minus any superior private debt (Y) and minus any reasonable closing costs (Z), as determined by the City, including, but not limited to, title insurance, recording fees, Realtor's commissions or property taxes.
- Additionally, the assisted Homebuyer will agree within the Affordability Period, to not vacate and then lease the property. In the event that the Homebuyer should vacate and then lease the property within the Affordability Period, the Homebuyer agrees, upon written demand from the City sent to the Homebuyer's last known address, to re-occupy the property within a reasonable time as determined by the City and remain in the property until the expiration of the Affordability Period. If re-occupancy does not occur the Homebuyer agrees to repay the total amount of the HOME subsidy assistance to the City. The repayment shall become due and payable upon the City's demand.

**Resale Provisions**

Subject to Resale Provisions are the total HOME funds that are invested in a HOME-assisted unit in which no direct subsidy assistance is provided. The minimum length of affordability is based on the total HOME funds assistance provided:

**Affordability Requirements for the HOME Program**

Total HOME Subsidy per unit	Minimum period of Affordability
Under \$15,000	5 Years
\$15,000 to \$40,000	10 Years
Over \$40,000	15 Years

- Outdoor improvements such as a new driveway, walkway, retaining wall, or fence.
  - The increase in the value of owner equity and investment as calculated by the cumulative percentage of change which is calculated by the Housing Price Index (HPI) calculator of the Federal Housing Finance Agency (X) plus 1.00 times the total owner investment at time of purchase (Y) plus the documented improvements as described above (Z).
    - (Example - Home purchased in 2000 for \$50,000. The HPI for 2000-2004 stayed the same at +.03 for each year, which calculates to a cumulative percentage of .12. To calculate “fair return” one must multiply \$50,000 x 1.12 = \$56,000, plus the documented improvements of \$4,000 would total \$60,000. The “fair return” to the seller would be the increase in value of \$60,000, minus the original investment of \$50,000 to equal a \$10,000 fair return.)
- Additionally, the assisted Homebuyer will agree within the Affordability Period, to not vacate and then lease the property. In the event that the Homebuyer should vacate and then lease the property within the Affordability Period, the Homebuyer agrees, upon written demand from the City sent to the Homebuyer’s last known address, to re-occupy the property within a reasonable time as determined by the City and remain in the property until the expiration of the Affordability Period. If re-occupancy does not occur the Homebuyer agrees to repay the total amount of the HOME subsidy assistance to the City. The repayment shall become due and payable upon the City’s demand.