

# Lake County Consortium

HOME-ARP Allocation Plan

February 20, 2023



**Note: The following plan was based on a template from the US Department of Housing and Urban Development (HUD). HUD’s guidance will appear in italics and is included as important background.**

**Consultation**

*Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and domestic violence service providers, veterans’ groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.*

***Summarize the consultation process:***

Lake County, as the HOME Consortium lead and Participating Jurisdiction (PJ), began the HOME-ARP with consultation with the cities of Waukegan and North Chicago. As a result, the consortium negotiated a three-way agreement related to HOME-ARP funds.

Lake County had extensive consultation with the Lake County Coalition for the Homeless, serving as the Continuum of Care (IL-502). Lake County presented to and gathered feedback from the Strategic Planning and System Performance Committee on multiple occasions . This plan also considers the findings from the Homeless Gaps Analysis conducted by the Corporation for Supportive Housing (CSH) in 2019. The Gaps Analysis process included a survey of homeless providers and consultation with related systems such as hospitals, township government and the criminal justice system.

In addition to the consultations above, Lake County consulted with organizations below to assess the greatest needs amongst households experiencing housing instability and homelessness.

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
<b>Lake County Coalition for the Homeless</b>	Homeless Continuum of Care (IL-502)	Series of meetings	All resources should have a preference for those experiencing literal homelessness. Priorities: <ol style="list-style-type: none"> <li>1. Site-based shelter</li> <li>2. Permanent Supportive Housing</li> <li>3. Units with 3+ bedrooms</li> </ol>
<b>Prairie State Legal Services</b>	Fair Housing/Legal Services	Meeting	More rental housing, especially for families.

			Need site-based shelter
<b>Lake County Health Department</b>	Federally Qualified Health Center and local Health Department	Meeting	Affordable housing is the need, especially in black and brown communities. Need larger units to allow multigenerational living.
<b>PADS Lake County</b>	Homeless shelter, street outreach and PSH Provider	Meeting	Site-based shelter will be transformational for the system. More units affordable to very low income. Need housing for large families. More PSH to allow to serve non-chronic population.
<b>People currently experiencing homelessness</b>	Rotating site shelter guests	Focus Group	Top priority is shelter followed by more affordable housing.
<b>Lake County Housing Authority</b>	Public Housing Authority	Meeting	More units of housing with a greater need for units with more bedrooms. Supportive Housing continues to be a need.
<b>Catholic Charities of the Archdiocese of Chicago</b>	Housing and Service Provider (SSVF, PSH, RRH)	Meeting	More housing in geographically diverse locations. High need among single men.
<b>Lovell Federal Healthcare Center (VA)</b>	Veterans Affairs	Meeting	Housing is the biggest need. Specifically, low barrier units owned by agencies or landlords who are used to working with landlords.
<b>A Safe Place</b>	Providers of shelter and services to survivors of domestic violence	Meeting	Additional shelter capacity is needed. Longer term rental subsidies are preferred for this population.

## Public Participation

PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

The HOME-ARP Allocation Plan (Allocation Plan) was made available to the public on February

20, 2023. The Allocation Plan was posted on the Lake County website. Physical copies were made available at the Lake County Central Permit Facility. A public notice was placed in the Lake County News Sun notifying the public of the availability of the plan as well as information on the public hearing. The public notice included the amount of HOME-ARP allocation to the Lake County and the range of eligible activities. A public hearing for the Allocation Plan took place on February 22, 2023.

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

- **Public comment period:** February 20, 2023 – March 8, 2023.
- **Public hearing:** February 22, 2023.

***Describe any efforts to broaden public participation:***

Training on the HOME-ARP funding source was included in training to potential applicants to housing, homeless and human service providers. This training was used to encourage feedback and conversations regarding potential applications. This training was open to anyone and recorded and shared with providers upon request.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

***Summarize the comments and recommendations received through the public participation process:***

No comments have been received prior to public plan availability and public hearing. This section will be updated to reflect any comments received during the public comment period and the scheduled public hearing.

***Summarize any comments or recommendations not accepted and state the reasons why:***  
All comments and recommendations were accepted.

**PUBLIC HEARING NOTICE**  
**LAKE COUNTY COMMUNITY DEVELOPMENT**

February 22, 2023 at 3:30 p.m.

Lake County's Housing & Community Development Commission  
18 N. County, Waukegan, IL 60085 – 10<sup>th</sup> Floor Conference Room

**PUBLIC HEARING – AMERICAN RESCUE PLAN HOME-INVESTMENT PARTNERSHIP PROGRAM (HOME-ARP)**

The Lake County Housing and Community Development Commission (HCDC) will hold a Public Hearing on February 22<sup>nd</sup> to review the county's HOME-ARP Allocation Plan. This Allocation Plan details the distribution of \$6,025,377 of funds appropriated in the American Rescue Plan Act. Activities eligible for HOME-ARP funds are limited to: administration and planning, rental housing, tenant-based rental assistance, supportive services, non-congregate shelter, and nonprofit operating and capacity-building assistance. All HOME-ARP funds must benefit predefined qualifying populations which include: homeless persons, persons at risk of homelessness, persons fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or other persons where providing supportive services or assistance would prevent homelessness or would serve those with the greatest risk of housing instability.

The Lake County Consortium will submit the HOME-ARP Allocation Plan to the U.S. Department of Housing and Urban Development (HUD) which governs the spending of the HOME Investment Partnership Program. Copies of the HOME-ARP Allocation Plan will be available, beginning February 20<sup>th</sup>, on the County's website at <https://www.lakecountyil.gov/1944/Action-Plan> and upon request. The public comment period for the plan will open on February 20, 2023 and will close on March 8, 2023.

An important part of the process of developing the HOME-ARP Allocation Plan is citizen participation and input. All interested parties, including citizens, local officials, and agency representatives are urged to attend the Public Hearings. Persons in need of special arrangements (translator, specific disabilities, etc.) should contact staff at least three (3) business days prior to the meeting date at 847.377.2150.

**PUBLIC COMMENTS**

Both in-person and written public comments are welcomed and encouraged. Written public comments received by noon on Wednesday, February 22, 2023, will be read at the appropriate time in the agenda. Please note: A total of 30 minutes will be permitted for Public Comments and no more than three minutes per public comment.

All comments received will be included in the meeting minutes regardless of whether they are read aloud at the meeting. Public comments shall be emailed to [communitydevelopment@lakecountyil.gov](mailto:communitydevelopment@lakecountyil.gov) with the following information:

- Subject title: Housing and Community Development Commission
- Name
- Organization
- Topic or agenda item

Written comments may be directed to the Lake County Department of Planning, Building, and Development – Community Development, 500 W. Winchester Road, Libertyville, IL 60048.

Questions, comments, and requests for information related to Public Hearings may also be submitted to Housing & Community Development Commission staff by calling 847.377.2150, emailing [communitydevelopment@lakecountyil.gov](mailto:communitydevelopment@lakecountyil.gov) or by writing to Lake County Department of Planning, Building, and Development – Community Development, 500 W. Winchester Road, Libertyville, IL 60048.

Information on the HOME Investment Program; can be obtained from Lake County's website at: <https://www.lakecountyil.gov/1894/Community-Development>.

## Needs Assessment and Gaps Analysis

*PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.*

Lake County has robust tools for evaluating the housing needs of people experiencing homelessness and housing instability. The following tables summarize some of that data.

**Homeless Needs Inventory and Gap Analysis Table**

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	183	92	118	118	0								
Transitional Housing	48	14	28	28	0								
Permanent Supportive Housing	35	8	153	153	307								
Other Permanent Housing						49	99	0	40				
Sheltered Homeless						65	182	2	27				
Unsheltered Homeless						0	15	0	0				
<b>Current Gap</b>										132	57	44	44

**Data Sources:** 1. 2022 Point in Time Count (PIT); 2. 2022 Continuum of Care Housing Inventory Count (HIC)

**Housing Needs Inventory and Gap Analysis Table**

<b>Non-Homeless</b>			
	<b>Current Inventory</b>	<b>Level of Need</b>	<b>Gap Analysis</b>
	# of Units	# of Households	# of Households
Total Rental Units	62,895		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	4,140		
Rental Units Affordable to HH at 50% AMI (Other Populations)	6,845		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		12,040	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		9,925	
<b>Current Gaps</b>			17,025

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

***Describe the size and demographic composition of qualifying populations within the PJ's boundaries:***

**1. Homeless, as defined in 24 CFR 91.5 Homeless (1), (2), or (3):**

The size and demographic composition of this qualifying population was assessed through a review of various data sources. The annual Point-in-Time report to HUD is a census count of sheltered and unsheltered homeless populations, as well as an assessment of the capacity of the homeless crisis response system. This data is summarized in the charts above.

In addition, the annual System Performance Measure data to HUD looks at specific data over the course of a year but does not include data from some domestic violence providers. For the year ending September 30, 2022, 1,189 people experienced literal homelessness in Lake County. This includes 208 households with children including a total of with 632 people. There were 555 households without children. Youth ages 18 to 24 were 85 of the 1,189. Four hundred ninety-three people had an identified disability. There were twelve veterans.

**2. At risk of Homelessness, as defined in 24 CFR 91.5 A**

There is no singular data source that describes the at-risk of homelessness population.

There are 65,792 rental households in Lake County according to the National Low-Income Housing Coalition's 2022 [Out of Reach](#) report. Of these renters, 46% are rent-burdened or paying more than 30% of their household income in rent. There were 46,919 households below the poverty line in Lake County according to [Heartland Alliance's Social Impact Research Center](#).

A worker would need to work 91 hours a week at minimum wage to afford a two-bedroom

apartment at fair market rent. The financial stresses of housing are most pronounced in larger families and households at the lowest incomes.

**3. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD.**

Lake County gathered community level and program data to assess the needs of people fleeing domestic violence, human trafficking, sexual assault and other survivor populations outlined in the notice. De-identified aggregate data from Infonet 2.0, a state sponsored database for domestic violence programs, and from HMIS for one agency that is permitted to use HMIS, according to HUD resources provided data on people served through the current shelter system. In a one-year time frame, 562 DV clients were served emergency shelters and over 3,500 people with supportive services. The CoC utilizes VI-SPDAT assessments for all clients to assess the vulnerability of clients through coordinated entry. This assessment tool identifies clients' needs, including the unique needs of survivors of domestic violence, dating violence, sexual assault, and stalking to ensure that the services they are offered. In the year ending September 30, 2021, 70% of households (513) assessed reported their homelessness was caused by an experience of physical, psychological, sexual or other type or abuse or trauma.

**4. Other Populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability.**

By definition, this qualifying population casts a wide net to include most low-income rental households. As described above, there are 65,792 rental households in Lake County according to the National Low-Income Housing Coalition's 2022 [Out of Reach](#) report. Of these renters, 46% are rent-burdened or paying more than 30% of their household income in rent. There were 46,919 households below the poverty line in Lake County according to [Heartland Alliance's Social Impact Research Center](#).

A worker would need to work 91 hours a week at minimum wage to afford a two-bedroom apartment at fair market rent. The financial stresses of housing are most pronounced in larger families and households at the lowest incomes.

When housing costs are more than 30% of a households income, they are at-risk of housing instability. An unexpected health or transportation expense or disruption to income can send a household into eviction.

***Describe the unmet housing and service needs of qualifying populations, including but not limited to:***

- ***Sheltered and unsheltered homeless populations;***
- ***Those currently housed populations at risk of homelessness;***
- ***Other families requiring services or housing assistance or to prevent homelessness;***  
***and,***
- ***Those at greatest risk of housing instability or in unstable housing situations:***



In 2019, the Corporation for Supportive Housing (CSH) completed a comprehensive homeless gaps analysis to provide assessment of homeless system performance, identification of housing and service gaps and strategy recommendations. The report evaluated CoC accessibility, assessed service and housing infrastructure to understand current availability and need of resources, and provided an overall assessment of system functionality and coordination. CSH worked with LCCD to understand how people experiencing homelessness in Lake County access services, shelter, and housing. The research conducted by CSH included the following tools: stakeholder interviews, tenant focus groups, review of system performance data, survey of homeless needs, stakeholder survey, mapping, a modeling tool that connects annual homelessness data with housing needs and a review of coordinated entry policies and procedures. CSH interviewed a variety of stakeholders on the accessibility of resources and housing throughout the county. CSH spoke to government agencies, townships, services providers, law enforcement, healthcare providers, and housing providers to understand what supports and services are needed and/or provided to visit individuals and families in navigating the housing and homeless response systems. CSH reviewed system performance data, including system performance measures (SPMs), CoC Annual Performance Reports (APRs), Longitudinal System Analysis (LSA) reports (formerly the Annual Homeless Assessment Report, AHAR), Point-in-Time (PIT) data, and the Housing Inventory Chart (HIC).

The perceptions highlighted during the stakeholder interviews and key themes in regard to the access of services and housing during the stakeholder interviews were 1) concentration of services in the eastern part of the county, 2) the challenges of transportation across the county (specifically in the western part of the county) and 3) the difficulty of having only one seasonal emergency shelter. The stakeholders described the services that were centralized in the Waukegan area, including access to Coordinated Entry and emergency shelter and public services such as PHAs, the Lake County Health Department, and the Social Security Administration office. In addition to public services, stakeholders noted that most justice system facilities were also concentrated in the eastern part of the county, so individuals who are homeless and involved in the justice system also tend to be concentrated in the eastern part of the county. Transportation was a consistent theme and an identified challenge in the stakeholder interviews. All stakeholders described the challenges faced by a person or family who became homeless in other parts of the county that were not near the services in Waukegan or the eastern half of the county. Stakeholders described ways that they tried to connect people to services and shelter by providing bus token assistance at the townships or transport via law enforcement, but options were limited due to a lack of public transportation heading west and east across the county. Regarding shelter services, stakeholders voiced a need for year-round shelter and shelter for families. The stakeholder interviews also highlighted a need for increased access to shelter services. Some stakeholders described that it can be challenging for people experiencing homelessness to make the shelter bus from PADS or find their own way to the rotating shelter locations. The stakeholders described needing a year-round emergency shelter that was possibly in a fixed location for people to access.

Gaps found in this report were the lack of year-round emergency services and day center due to Lake County's current shelter system being seasonal and based on a rotating-site model leads to limited space to secure belongings. Secondly, Lake County currently does not have an emergency shelter, day center, or crisis response location dedicated to families with minor children. There is also found that Lake County does not have services or housing resources dedicated to

unaccompanied youth. The community has identified a lack of locations and services that can assist those with serious mental illness or those under the influence of drugs or alcohol, which results in unnecessary jail or hospital stays. Transportation challenges have been identified by stakeholders and developing a multidisciplinary mobile outreach team would increase access to services, shelter, and housing throughout the county. This outreach team could include case managers/housing navigators, a behavioral health specialist, and peer support workers. Furthermore, increasing access to townships that are accessible to all areas rather than less dense areas as well as expanding relationships between townships and the CoC, including standardizing processes across townships to facilitate access to emergency shelter, housing and services. Conducting summer street counts, creating a “bridge” housing for individuals matched in coordinated entry, evaluating prevention program with ESG funding and establishing a “funders collaborative” which brings public, private, and philanthropic funders together to better align resources across homeless services.

The conclusions of the CSH report remain valid and are a strong foundation for the additional analysis that the PJ conducted through consultations and a review of additional local homeless data, including the annual assessment of Coordinated Entry, the annual racial equity analysis, annual system performance measures and monthly reporting of coordinated entry data.

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

The Lake County Coalition for the Homeless (LCCH) is the established Continuum of Care (CoC) for Lake County, representing and organizing government, service providers, businesses, and philanthropy. A key responsibility of the CoC is to manage the HUD Continuum of Care program. The CoC program is one source of HUD funding that promotes communitywide commitment to the goal of ending homelessness. CoC provides funding for permanent supportive housing, rapid re-housing, transitional housing, and supportive services. CoC funds are competitive and must be applied for on an annual basis through the CoC Notice of Funding Availability (NOFA). Using the NOFA, HUD provides local communities wide latitude in making funding decisions and resource allocation. In the last five years, HUD has promoted funding permanent housing solutions through the CoC program while strongly encouraging communities to focus transitional housing on special populations like survivors or domestic violence, youth, and people with substance use disorders.

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

COVID-19 still possesses a threat to Lake County communities. Lake County’s Health Department data shows new COVID-19 cases are increasing as of December 2021. New COVID-19 variants, first Delta and then Omicron, have continued to create new infection surges. The Chicago Metropolitan Agency for Planning has recognized that homelessness had a decrease between 2007 and 2019. However, COVID-19 highlighted the need for crisis housing and

shelters. A Safe Place and PADS Lake County are the only homeless providers in Lake County. A Safe Place exclusively services domestic violence survivors, which has seen an increase in during the pandemic.

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

Not applicable.

***Identify priority needs for qualifying populations.***

The need for affordable rental housing was the unifying theme in consultations and the data. The need is greater for people with larger family sizes, with disabilities and/or at the lowest incomes. Homeless providers cited barriers in the private housing market such as background checks and credit requirements that exclude them from housing. The need for site-based permanent supportive housing (PSH) continues to be a priority need. Nearly all PSH units in Lake County are scattered site which creates additional barriers to entry.

Additionally, there is strong evidence and agreement on the need for site-based shelter in Lake County. This plan does not go into detail on this need for two reasons. First, the robust site design process that incorporated trauma-informed design and feedback from stakeholders, including people with lived experience of homelessness, resulted in a design that is incompatible with the HOME-ARP regulations. Second, the County has allocated other ARP resources to this project and in combination with other resources, the provider anticipates that HOME-ARP funding is not necessary for the project at this time. If these conditions change, Lake County will revisit the funding priorities in this plan.

***Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:***

The needs of the HOME-ARP qualifying populations were determined based on recommendations from CSH’s Homeless Gaps Analysis, an analysis of current data and feedback from consultation interviews. The recommendations here were development in also partnership with the Strategic Planning and System Performance Committee of the Homeless Continuum of Care.

### **HOME-ARP Activities**

***Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible***

**activities directly:**

Lake County will issue a Notice of Funding Availability (NOFA) detailing the amount of HOME-ARP funding available for the development of affordable rental. Lake is seeking to develop at least 15 units, with a preference for supportive-type housing models and family affordable housing. Applications will be reviewed by Lake County Community Development Division and then presented to the Lake County Housing and Community Development Commission (HCDC). Approved applicants will then seek final approval from the Lake County Board.

Lake County will not be administering eligible services directly.

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

No portion of the Lake County Consortium's HOME-ARP administration funds were allocated or disbursed prior to HUD's acceptance of the HOME-ARP allocation plan.

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$0		
Acquisition and Development of Non-Congregate Shelters	\$0		
Tenant Based Rental Assistance (TBRA)	\$0		
Development of Affordable Rental Housing	\$5,121,570		
Non-Profit Operating	\$0	0%	5%
Non-Profit Capacity Building	\$0	0%	5%
Administration and Planning	\$ 903,807	15%	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 6,025,377</b>		

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

The needs identified in the completed gap analysis include the development of affordable rental housing with a preference for permanent supportive housing. Additionally, the lack of 3- and 4-bedroom units for families was identified as a priority need for Lake County. Lake County is allocating over \$5 million dollars of HOME-ARP to help address this need. The allocated funds will be leveraged against the other public and private sources needed to finance multifamily rental

development.

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

After reviewing the gap analysis for shelter and affordable housing availability, as well as analyzing local capacity and other sources of funding relating to community needs, Lake County identified the development of affordable rental housing as the best use of eligible HOME-ARP activities that will provide long-term assistance to individuals and families. There are significant needs throughout the County for each of the eligible activities, and the lack of affordable housing was specifically emphasized by stakeholders. The gap analysis shows that there is a need to increase the supply of affordable housing as a means to increase availability of permanent supportive housing and provide opportunities for LMI households. Developing affordable rental housing was highlighted by stakeholders as the top priority and these efforts work as a more permanent solution.

### **HOME-ARP Production Housing Goals**

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

Lake County estimates 15 units of affordable rental housing will be developed for qualifying populations. The formulation of the estimate assumes the majority of units will address the need for family units (3- and 4-bedroom units) and incorporates the Consortium per unit subsidy limits.

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

Lake County has set a goal to develop 15 units of affordable rental housing for HOME-ARP qualifying populations. The lack of affordable rental housing in Lake County is an identified priority need. The allocation of HOME-ARP funds to support development of units, specifically units with more than 2-bedrooms, will directly address this need.

## Preferences

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

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

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

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

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

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan. For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan.** Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

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

- *Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).*
- *PJs are not required to describe specific projects to which the preferences will apply.*

Lake County will offer a preference to persons and households experiencing homelessness, who meet the HUD definition of homeless (24 CFR 91.5). Please note that this definition includes households who are fleeing, or is 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, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; has no other residence; and lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

Homeless households will be prioritized for HOME-ARP units first before any other Qualifying Population, as identified through Coordinated Entry. The Lake County CoC has developed written standards for providing housing and services to people experiencing or at-risk of homelessness through its Coordinated Entry (CE) System. The CE continuously improves to assure that it is comprehensive. The system meets the quality standards put forth by the Community Solutions Built for Zero Campaign for veterans and chronically homeless populations. The CE system follows best practices to assure that it is comprehensively capturing households in the target population.

The other Qualifying Populations listed below will receive equal preference for the HOME ARP projects after the prioritization of homeless persons and households/families.

- At risk of Homelessness (QP2)

- Individual or families who are fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking (QP3)
- Other Populations (QP4), including:
  - Families Requiring Services or Housing Assistance to Prevent Homelessness
  - At Greatest Risk of Housing Instability

For populations that are not included CE, referrals will be made to the projects from community resources that also serve Qualifying populations. Subrecipients will be responsible for maintaining waitlists and soliciting referrals from appropriate sources.

***If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:***

The homeless preference above is consistent with the data and feedback from consultations. This allocation of funding is done in context of other funding from the American Rescue Plan. Lake County has made the development of affordable housing a priority in the allocation of its State and Local Fiscal Recovery Funding (SLFRF). There is currently nearly \$5 million allocated for projects that will benefit other qualifying populations and address the gaps in housing affordability. Additionally, Lake County successfully ran rental assistance programs with CARES Act, ARPA and Emergency Rental Assistance Programs funding. This was a historic investment in low-income rental households, providing housing stability and preventing evictions. The State of Illinois' Eviction Rental Assistance Program and the Lake County Eviction Prevention Program continue to provide rental assistance households through court-based programs.

There are persistent housing needs in all qualifying populations. Lake County is making a concerted effort to address these needs with the resources available. The HOME-ARP funding is a rare opportunity to preference those experiencing homelessness. This is done as a part of a larger strategy to comprehensively address housing affordability.

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## **Referral Methods**

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

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

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

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

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

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

Lake County has set a goal of 15 units for qualifying populations. Lake County will use a chronological referral method for HOME-ARP assisted rental housing. Housing developers will specify HOME-ARP qualifying populations within their Tenant Selection Plan (TSP). In coordination with the Lake County CoC, Lake County will develop a list of local service providers and provide the list to the selected housing developers. The developer will be required to notify providers of the available number of units, the date applications are due and all application requirements. The developer will then accept applications on a first come, first serve basis. Applications will be Screened for HOME-ARP eligibility prior to a tenant being

matched to a unit.

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

Lake County intends to use CE for referrals for the preference population. CE includes all populations in that preference. For populations that are not included CE, referrals will be made to the projects from community resources that also serve qualifying populations. Subrecipients will be responsible for maintaining waitlists and soliciting referrals from appropriate sources. Each funded project will outline details in their Tenant Selection Plan. Lake County will review these for HOME-ARP compliance. All QPs will have access to HOME-ARP funded projects through these methods.

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

Lake County's CE is designed to leverage available housing resource for maximum impact in the goal of reducing the number of people experiencing homelessness, the length of time homeless and the number of households returning to homelessness. CE considers the eligibility of all housing resources, as well as prioritization. Generally, CE follows the following prioritization:

1. Chronic Status: This first prioritization criteria focuses on those individuals who have experienced multiple episodes of homelessness and are generally those with the highest need and vulnerability. In addition, this population has been identified as being the largest user of homeless system resources.
2. VI-SPDAT Score: This second prioritization targets the most vulnerable clients in the homeless system as determined by their total VI-SPDAT score.
3. Length of Time Homeless: The third prioritization method is the length of time an individual has experienced homelessness, giving priority to the person that has experienced homelessness the longest.
4. Overall Wellness: The fourth prioritization factor targets individuals with medical needs who will be prioritized when they have behavioral health conditions or histories of substance use which may either mask or exacerbate medical conditions.
5. Date of VI-SPDAT Assessment: The final prioritization criteria will be the date of the individual's assessment, giving priority to the earliest date of assessment.

Full [CE policies](#) are available on the Lake County Coalition for the Homeless' website under [Coordinated Entry Resources](#).

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

Lake County will use CE as a referral method for the priority population. Referral through CE will be treated as a preference. All other qualifying populations can apply for HOME-ARP funded affordable rental housing developments and will be added to the project waiting list.

Additional details will be provided at the project level in the tenant selection plans.

### **Limitations in a HOME-ARP rental housing or NCS project**

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

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

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

Lake County does not intend to limit eligibility for HOME-ARP rental housing projects. There is no NCS project included as part of this allocation plan.

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

Lake County does not intend to implement a limitation on any affordable rental housing projects.

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

Not applicable.

## **HOME-ARP Refinancing Guidelines**

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

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