
MEMORANDUM

TO: Continuum of Care Consortia

FROM: Bill Pluta, Director
Director, Strategic Planning and Reporting (SPAR)

CC: Audra Hamernik, Executive Director

RE: **Requests for Certification of Consistency with the State Consolidated Plan (ConPlan)**

DATE: August 1, 2017

As you may know, applications for a number of HUD-funded competitive grants covered under HUD's various "NOFA's" (Notice of Funding Availability), must include a **Certification of Consistency** with the Consolidated Plan as a pre-requisite to HUD's acceptance of an application. HUD has announced the NOFA for the Fiscal Year 2016 Continuum of Care Program Competition with an application deadline of **7:59:59 p.m. eastern time, September 28, 2017**. For general information regarding the HUD-funded competitive grants and other general information pertaining to the Certification of Consistency, the 2017 Continuum of Care FY2017 NOFA can be accessed from HUD exchange website at <https://www.hudexchange.info/resource/2905/coc-application-component-of-the-coc-consolidated-application/>. Continuum of Care applicants will be required to complete and submit their application through e-snaps at www.hud.gov/esnaps.

For **Continuum of Care agencies which** are required to complete a **Certification of Consistency**, information has been provided in this memo for your convenience. The applicant entity is to obtain this certification from the lowest level of government that has an approved Consolidated Plan covering the jurisdiction in which the proposed project will be located. To provide consistency in how such proposals which fall under the State's (IHDA's) review are handled, this memo serves to establish standardized procedures for the processing of such requests.

I. Determining the Jurisdiction to request a Consolidated Plan Certification of Consistency

In addition to states, the following types of local jurisdictions are required to submit a Consolidated Plan to HUD as a condition of funding for each Federal Fiscal Year:

- A Metropolitan City or Urban County that directly receives funds under the Community Development Block Grant (CDBG) Entitlement Program;
- A city or county that will be a "Participating Jurisdiction" (i.e. local direct grantee from HUD) under the HOME program;
- A Consortium formed for the purpose of participating directly with HUD in the HOME program.

Local jurisdictions that only receive CDBG, HOME, or ESG funds through participation in a State-administered program are not required to submit a Consolidated Plan to HUD or to the State for the purpose of that funding, but may be required to submit a local Certification of Consistency for others (example: for Low Income Housing Tax Credit projects proposed in CDBG Entitlement areas). See **Attachment A** for a statewide listing of municipalities and counties that are required to submit Consolidated Plans to HUD.

To determine whether or not the particular program being applied for requires a Consolidated Plan (“ConPlan”) certification of consistency, please refer to the program guidelines and Notice of Funding Availability (NOFA) regulations which HUD publishes in the Federal Register for each particular program.

II. Procedures for Applicants Whose Certification of Consistency is Reviewed by IHDA

The procedures for reviewing and processing an applicant entity's proposal for consistency with the State Consolidated Plan is set up as a very straightforward and streamlined process. Here are the chronological steps:

Applicant Procedures:

- A. The applicant entity must submit a detailed project description for each project. IHDA will utilize the Review Checklist to determine consistency with the State’s Consolidated Plan. **(See Attachment B Internal Checklist Tab.)**
- B. The applicant entity must utilize the IHDA Project Application List to list of all projects (new and renewal) when requesting certifications. **(See Attachment B List of Projects Tab.)**
- C. **The applicant entity must submit their request for certification to IHDA in a timely manner.** IHDA cannot guarantee review and certification of program or project applications which are received less than five (5) working days before HUD's application deadline. Also, please respond to all sections regarding required information.

IHDA Procedures:

- A. Upon receipt of a proposal, SPAR staff will review the above form for completeness. If said application appears to be consistent with the State Consolidated Plan, the reviewing staff person shall also have the Certification prepared.
- B. The Certification will then be provided to IHDA's Executive Director for signature. A minimum of 5 working days is generally needed here to ensure that the Executive Director is available to review and sign the required Certification. The applicant entity is encouraged to submit its final proposal to IHDA’s Department of Strategic Planning and Reporting (SPAR) at its earliest possible convenience before said application is due to HUD. IHDA cannot guarantee review and certification of program or project applications which are received less than five (5) working days before HUD's application deadline, especially those which may be required to be submitted to HUD Headquarters in Washington, D.C., as all certifications must be signed by IHDA’s Executive Director.
- C. The Certification will be scanned (pdf) and e-mailed to the applicant unless otherwise

instructed. The original signature paper copy will also be mailed. It is the applicant's responsibility to determine and request the appropriate routing of the document and inform IHDA of the same. **IHDA will not be responsible for Overnight/Express mailing or hand-delivery of such documents to the HUD Regional or Headquarters offices.**

- D. IHDA's review of projects for Certification of Consistency with the State Consolidated Plan is not intended at this time to serve as or replace a HUD completeness/eligibility screening of such applications and proposals. However, if concerns or problems are identified during the review of same, IHDA staff will attempt to notify the applicant of those matters. It will be the applicant's responsibility to resolve them.
- E. Please note that changes to HUD's homeless assistance funding (per the HEARTH Act) require only **ONE** Certification of Consistency with the State ConPlan be submitted to HUD by each Homeless Continuum of Care agency. A narrative and review checklist are required for **each project** (including any Permanent Housing Bonus Project Applications). Please also include the name of the lead contact for the CoC. It is incumbent on the applicant to provide adequate time for such reviews prior to HUD application deadlines.

III. Please also note that HUD's scoring process under the current NOFA indicates the following:

- HUD has made several changes to the eligibility requirements for permanent housing, permanent supportive housing, and rapid rehousing.
- Renewal project applicants may submit their renewal project applications with no changes.
- Maximum points will be awarded to CoCs that demonstrate how the CoC consults with each Consolidated Plan jurisdiction, whether Point In Time (PIT) count data is provided for the development or update of the Consolidated Plan, and whether the CoC provided consultation to the local ESG recipient in determining the ESG funding allocation plan and performance plan, including how to evaluate and improve performance of ESG project activities.
- Coordination with Federal, State, Local, Private, and Other Organizations. Up to 3 points provided to CoCs that identify and coordinate with other organizations that serve individuals, families, unaccompanied youth, and persons fleeing domestic violence who are experiencing or are at risk of homelessness. To receive maximum points, CoCs must demonstrate: other federal, state, local, private, and other organizations are included in the planning and operation of projects; and (2) they actively consult with ESG recipients in the planning and allocation of ESG funds and participate in the Consolidated Plan jurisdictions' process(s) by providing PIT and HIC data and ensuring local homelessness information is communicated and addressed in the Consolidated Plan updates.
- Housing First and Reducing Barriers. Up to 8 points provided to CoCs that demonstrate at least 75 percent of all housing project applications (i.e., permanent housing, transitional housing, and safe haven) submitted under this NOFA are using the Housing First approach by providing low barrier projects that do not have service participation requirements or preconditions to entry and prioritize rapid placement and stabilization in permanent housing. This means the projects allow entry to program participants regardless of their income, current or past substance use, history of victimization (e.g., domestic violence, sexual assault, childhood abuse), and criminal record—with the exception of restrictions imposed by federal, state or local law or ordinance (e.g., restrictions

on serving people who are listed on sex offender registries). Maximum points will be awarded to CoCs that demonstrate at least 75 percent of the housing project application(s) will use a Housing First approach. Any housing project application that indicates it will use a Housing First approach, that is awarded FY 2017 CoC Program funds will be required to operate as a Housing First project.

IV. To assist in making Continuum of Care applications more competitive in those areas, IHDA can provide the following information to applicants upon request:

- Illinois PHA List with contact information for (homeless admission preference, HCVs, VASH, accessing mainstream resources)
- CDBG Entitlement grantees list with contact information (to encourage documenting coordination with HCD and ESG grantees)
- CPD FFY 2017 Allocations chart (CDBG/HOME/ESG/HOPWA funding information)

Hopefully including this information will provide applicants with additional guidance to improve their documentation and scoring in these areas.

These procedures can be expedited in cases where IHDA has determined that extenuating circumstances existed which were beyond the control of the applicant. Even in these situations, no guarantees to meet pending HUD deadlines can be made by IHDA. In closing, please contact the SPAR staff at 312/836-5262 for additional information or assistance on these matters.

Local Consolidated Plan Communities for FFY 2017 Funding

Projects located in the following cities and counties require a local Consolidated Plan Certification of Consistency, which should be requested from the city or county in which the project is located, except as noted below (see NOTE). The State (IHDA) does not provide Certifications of Consistency for projects located in the following cities and counties.

Cities:

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| (1) Alton (PE- Madison County Consortium) | (25) Mount Prospect (PE - Cook County Consortium) |
| (2) Arlington Heights | (26) Naperville (PE – DuPage County Consortium) |
| (3) Aurora | (27) Normal |
| (4) Belleville (PE – St. Clair County Consortium) | (28) North Chicago (PE - Lake County Consortium) |
| (5) Berwyn (PE – Cook County Consortium) | (29) Oak Lawn |
| (6) Bloomington | (30) Oak Park (PE - Cook County Consortium) |
| (7) Bolingbrook (PE – Will County Consortium) | (31) Palatine (PE – Cook County Consortium) |
| (8) Champaign (PE - Urbana Consortium) | (32) Pekin |
| (9) Chicago | (33) Peoria |
| (10) Chicago Heights (PE - Cook County Consortium) | (34) Rantoul |
| (11) Cicero (PE - Cook County Consortium) | (35) Rock Island |
| (12) Danville | (36) Rockford |
| (13) Decatur | (37) Schaumburg (PE – Cook County Consortium) |
| (14) DeKalb | (38) Skokie |
| (15) Des Plaines | (39) Springfield |
| (16) Downers Grove (PE- DuPage County Consortium) | (40) Urbana (LE) |
| (17) East St. Louis (PE – St. Clair County Consortium) | (41) Waukegan (PE – Lake County Consortium) |
| (18) Elgin (PE – Kane County Consortium) | (42) Wheaton (PE- DuPage County Consortium) |
| (19) Evanston | |
| (20) Granite City (PE- Madison County Consortium) | |
| (21) Hoffman Estates (PE – Cook County Consortium) | |
| (22) Joliet (PE – Will County Consortium) | |
| (23) Kankakee | |
| (24) Moline | |

Counties:

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| (43) Cook County (LE) |
| (44) Champaign County (PE – Urbana Consortium) |
| (45) DuPage County (LE) |
| (46) Kane County (LE) |
| (47) Lake County (LE) |
| (48) Madison County (LE) |
| (49) McHenry County |
| (50) St. Clair County (LE) |
| (51) Will County (LE) |

PE = Participating Entity in a HOME Consortium LE = Lead Entity of a HOME Consortium

NOTE: A Certification of Consistency for “participating entities” of a HOME Consortium should be obtained from the lead entity. The lead entity for each participating entity is noted beside each participating entity. For lead entity contact information, contact Burton Hughes at 312-836-5320 or Pearl Madlock at 312/836-5262.