



DEPARTMENT OF COMMUNITY DEVELOPMENT SERVICES

Grants Management Division

m e m o r a n d u m

TO: Mayor Diane Wolfe Marlin and City Council Members

FROM: Lorrie Pearson, AICP, Community Development Services Director
Sheila Dodd, Manager, Grants Management Division

DATE: May 28, 2020

SUBJECT: AN ORDINANCE APPROVING THE CITY OF URBANA AND URBANA HOME CONSORTIUM (CHAMPAIGN/URBANA/ CHAMPAIGN COUNTY) CONSOLIDATED PLAN FOR FISCAL YEARS 2020-2024 AND ANNUAL ACTION PLAN FOR FISCAL YEAR 2020-2021

A RESOLUTION APPROVING THE HOUSING REHABILITATION PROGRAM OPERATIONAL GUIDELINES CITY OF URBANA HOUSING PROGRAM MANUAL PROGRAM YEARS 2020-2024

A RESOLUTION APPROVING THE CITY OF URBANA AND URBANA HOME CONSORTIUM COVID-19 PROGRAM MANUAL PROGRAM YEARS 2020-2024

Description

The City of Urbana, Grants Management Division, seeks approval of the CITY OF URBANA AND URBANA HOME CONSORTIUM (CHAMPAIGN/URBANA/CHAMPAIGN COUNTY) FY 2020-2024 CONSOLIDATED PLAN and an ANNUAL ACTION PLAN for FY 2020-2021. The Plans will be submitted to the US Department of Housing and Urban Development (HUD) for review so the City of Urbana to continue to receive Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) funding. The Housing Rehabilitation Program manual and COVID-19 Program manual will be submitted to HUD as a part of the plans. Approval of the Housing Rehabilitation Manual and COVID-19 Manual is being requested for program implementation.

Background & Discussion

CONSOLIDATED PLAN FY 2020-2024. As a recipient of CDBG and HOME entitlement funding from the U.S. Department of Housing and Urban Development, the City of Urbana and the Urbana HOME Consortium are required to submit a Five-Year Consolidated Plan. HUD provides the following summary statement concerning the Consolidated Plan:

The overall goal of the community planning and development programs covered by this part is to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities principally for low- and moderate-income persons. The primary means towards this end is to extend and strengthen partnerships among all levels of government and the private sector, including for-profit and non-profit organizations, in the production and operation of affordable housing.

A more functional purpose of the Consolidated Plan is to guide the utilization of the City's HOME and CDBG resources. Any project funded with CDBG and/or HOME funds must be consistent with the goals, strategies, and objectives included in the Consolidated Plan. At the March 2, 2020 Urbana City Council Committee of the Whole meeting, staff provided the Council with a draft plan and budget as well as an overview of the process.

The Consolidated Plan and Annual Action Plan are completed electronically and submitted to HUD through the Integrated Disbursement and Information System (IDIS). The Executive Summary of the Plan provides an evaluation of the City's past performance as well as a description of the performance measurement framework required by HUD. The demographic information/data, housing/community development information, and related background information are based on information from the Census and other resources provided by HUD. Many of the housing and community development goals and strategies are similar to those contained in the previous Consolidated Plan. Although the Consolidated Plan covers a five-year period, it can be amended at any time in order to reflect new concerns or opportunities in the community.

A public hearing, to accept comments on the Consolidated Plan, was held at 6:00 p.m. on February 25, 2020, immediately prior to the Community Development Commission meeting. A draft of the Plan was also made available for public review and comment from March 1, 2020 to April 10, 2020. The public comment period was extended an additional 10 days due to the COVID-19 shelter in place mandate. All comments were incorporated into the final plan for City Council approval.

The beginning of the FY 2020-2021 program year is July 1, 2020. HUD requires that the Consolidated Plan be submitted at least 45 days prior to the beginning of the program year, however, a waiver has been granted to submit the plan late date due to COVID-19. City Council is scheduled to review and approve the Consolidated Plan and Annual Action Plan at its June 8, 2020, Council meeting.

ANNUAL ACTION PLAN (AAP) FY 2020-2021. The funding allocation amounts for the next fiscal year have been determined, as the Department of Housing and Urban Development (HUD) has announced its formula allocations for entitlement communities. For FY 2020-2021, the City of Urbana's CDBG allocation from HUD is **\$501,415** and the Urbana HOME Consortium allocation is **\$822,390**. In April 2020, the city received notice of the CDBG-CV allocation of **\$294,966**. The FY 19/20 plan was amended on May 26, 2020, to incorporate these funds into the Annual Action Plan. Due to the timing of the funds, the amendment was completed and the proposed program manual is attached for Council consideration.

HOUSING PROGRAM MANUAL FY 2020-2024. City Council has traditionally directed a significant portion of the City's grant funds toward rehabilitation of owner-occupied housing and other housing programs. Federal regulations governing the programs allow the City flexibility in disbursing these funds provided local guidelines exist to assure that program objectives are met and funds are expended in an equitable and timely manner. The Housing Program Manual provides the required guidelines and procedures for the programs and projects undertaken by the Grants Management Division of the Department of Community Development Services. This revised manual will run concurrent with the new Consolidated Plan for years 2020-2024.

COVID-19 PROGRAM MANUAL FY 2020-2024. In response to the COVID-19 pandemic, Congress passed the Coronavirus Aid, Relief, and Economic Security Act (CARES Act). As a recipient of CDBG funds, entitlement funding in the amount of \$294,966 was awarded to the City of Urbana

from HUD. The announcement from HUD indicated further guidance would be forthcoming; however, jurisdictions were encouraged to begin planning for the use of the funds immediately. Final guidance has not been received at this time. The funding is to be used to address needs of low- and moderate income persons impacted by COVID-19. Partnerships and coordination with the local public health district, state, and local service providers were encouraged by HUD to address activities in response to the pandemic. City staff has worked closely with Village of Rantoul, City of Champaign, Champaign County Regional Plan Commission, Small Business Association, social service agencies, homeless service providers, economic development groups, Housing Authority of Champaign County, and Champaign Urbana Public Health District to identify community needs. The funding needs to address gaps in service and not duplicate services provided by other agencies and federal/state funds.

At the May 18, 2020 Committee of the Whole meeting, Council identified small business economic development assistance as a need they were hearing in the community. Council directed staff to research opportunities to address overcrowding and housing needs. Based on this direction and outreach of other available programs in the community, Housing and Small Business Assistance have been identified as the greatest gap in the community. The COVID-19 Program manual outlines three programs to address those needs. Once Council approves the program manual, staff will do outreach to small businesses and housing agencies to advertise the program.

On May 27, 2020 the Community Development Commission forwarded the proposed Consolidated Plan FY 2020/2024, Annual Action Plan FY 20/21, Housing Rehabilitation Program manual, and COVID-19 Programs manual with a recommendation for approval. Unapproved minutes from the Community Development Commission meeting are attached for review.

Options

1. Approve the Ordinance and Resolutions
2. Approve the Ordinance and Resolutions with changes
3. Do not approve the Ordinance and Resolutions

Fiscal Impact

There are considerable fiscal impacts associated with the preparation of the FY 2020-2024 Consolidated Plan. The main impact of the Consolidated Plan is that it can influence funding availability and utilization of CDBG and HOME funding. If a proposed project is not consistent with the goals and strategies of the Consolidated Plan, the project cannot be funded with CDBG, CDBG-CV, or HOME funding unless the Consolidated Plan is amended to include the project. The proposed Annual Action Plan FY 2020-2021 includes revenue from HUD of **\$501,415** in CDBG funds, unexpended prior year CDBG funds **\$300,000**, unexpended CDBG-CV funds of **\$285,000**, and HOME funds of **\$822,390**. The final proposed budget is attached.

The Consolidated Plan will guide the annual expenditures of CDBG and HOME funding. Failure to submit the Consolidated Plan and Annual Action Plan to HUD may result in a significant delay in accessing CDBG and HOME funds, which would create a financial burden for the City to advance funds for these programs.

Recommendation

Staff and the Community Development Commission unanimously recommend approval of the City of Urbana and Urbana HOME Consortium Consolidated Plan FY 2020-2024, the Annual Action

Plan FY 2020-2021, along with the Housing Program Manual FY 2020-2024 and COVID-19 Program Manual FY 2020-2024.

Attachments:

1. AN ORDINANCE APPROVING THE CITY OF URBANA AND URBANA HOME CONSORTIUM (CHAMPAIGN/URBANA/CHAMPAIGN COUNTY) CONSOLIDATED PLAN FOR PROGRAM YEARS 2020-2024 AND ANNUAL ACTION PLAN FOR FISCAL YEAR 2020-2021
2. A RESOLUTION APPROVING HOUSING REHABILITATION PROGRAM OPERATIONAL GUIDELINES AS ORIGINALLY AUTHORIZED BY RESOLUTION NO. 2010-04-010R (CITY OF URBANA HOUSING PROGRAM MANUAL PROGRAM YEARS 2020-2024)
3. A RESOLUTION APPROVING THE COVID-19 PROGRAM MANUAL FY 2020-2024
4. May 27, 2020 Community Development Commission Unapproved Meeting Minutes

BUDGET AND SUMMARY OF RECOMMENDATIONS

HOME PROGRAM FY 2020-2021 Proposed Budget

HOME Grant Allocation	\$822,390
Administration (10%)	\$82,239
Personnel/Administrative Costs	\$82,239
CHDO Set-Aside (15%)	\$123,358
CHDO Project Applications (15%)	\$123,358
CHDO Operating	\$37,500
CONSORTIUM SPLIT	\$579,293
City of Champaign (50.9%)	\$294,860
County (18.3%)	\$106,011
Urbana (30.8%)	\$178,422
TOTAL Budget	\$822,390

CDBG PROGRAM FY 2020-2021

CDBG Federal Allocation	\$501,415
CDBG Unexpended Prior Year funds	\$300,000
CDBG-CV Unexpended Funds	\$285,000
Total	\$1,086,415
ADMINISTRATION	\$157,000
Personnel and Associated Costs	\$157,000
PUBLIC SERVICE/COVID-19 PROGRAMS	\$436,000
Transitional Housing	\$40,000
Neighborhood Cleanup(s)	\$16,000
Consolidated Social Service Fund	\$5,000
Covid-19 Housing Subsidy Payments/Small Business Assistance	\$375,000
NEIGHBORHOOD REVITALIZATION PROGRAMS	\$493,415
Capital Improvement Projects, Blight Reduction, Code Enforcement, Public Facility, Economic Development	\$213,415
Housing-Related Programs and Program Delivery	
Emergency/Access	\$40,000
Urbana Senior Repair	\$40,000
Property Acquisition/Demolition/New Construction (estimated)	\$200,000
TOTAL Budget	\$1,086,415



UNAPPROVED

MINUTES

COMMUNITY DEVELOPMENT COMMISSION MEETING

May 27, 2020, virtually via Zoom

City of Urbana, 400 South Vine Street, Urbana, IL 61801

Call to Order and Roll Call: Chairperson Heinze-Silvis called the meeting to order at 6:06pm.

Commission Members Present: Anne Heinze-Silvis, Michael Braun, Chris Diana, Robert Freeman, Patricia Jones, and Darius White.

Commission Members Excused/Absent: Abdulhakeem Salaam.

Others Present: Sheila Dodd, Grants Management Manager; Alyssa Jaje, Community Development Specialist.

Approval of Minutes: The April 28, 2020 minutes were presented for approval. Commissioner Freeman motioned to approve the minutes, with a correction to the listed “Commission Members Absent/Excused” to reflect Commissioner Heinze-Silvis’ attendance. Commissioner White seconded the motion. The motion carried unanimously.

Additions to the Agenda: Ms. Dodd added the review of the FY2020-2024 Consolidated Plan to the agenda. A draft of the plan was presented to commissioners at the February 24, 2020 meeting. Since the March meeting of the Community Development Commission was cancelled, the Consolidated Plan did not receive final recommendation for approval to forward to City Council. Commissioner Freeman motioned to recommend the Plan to Council for approval. Commissioner Jones seconded the motion. The motion carried unanimously.

Public Input: There was no public input.

Presentations:

Staff report: Throughout April and May, staff has focused on preparing to receive and utilize additional funds in response to the COVID-19 pandemic. Staff has attended many meetings and webinars to finalize the administrative pieces of these new funding sources. The next step is to implement programs.

Unfinished Business: There was no unfinished business.

New Business:

- a) City Staff and Cunningham Township staff went to City Council last night to discuss changing the timeline to the Consolidated Social Service Fund process. Staff recommended funding three programs initially and allowing other agencies to revise their applications to reflect agency changes as a result of COVID-19. The three agencies recommended for funding were Health Care Consumers, Wesley Food Pantry, and Sola Gratia Farm. Applications were due at the end of February and a lot has changed since then. Staff aims to ensure these funds are serving low-income Urbana residents as effectively as possible.
- b) The City of Urbana will receive about \$294,000 in CDBG-CV funds to address negative impacts related to COVID-19. Staff is proposing to offer three programs funded by this money. The housing

program will address housing insecurity in two ways. Assistance will be provided for rent or mortgage payments and/or utility assistance for any household that has been impacted by COVID-19 and was current on payments prior to the state's shelter-in-place order. The final program assists small businesses. This assistance can include salary or operating costs for the last two months, up to \$10,000. It can also include additional costs incurred to meet social distancing requirements or the need for personal protective equipment. Discussion between staff and commissioners followed about the written policy manual for these programs. Commissioner Braun motioned a recommendation approving the programs and the manual to City Council. Commissioner Jones seconded the motion. The motion carried unanimously.

Adjournment: Seeing no further business, Chairperson Heinze-Silvis adjourned the meeting at 7:08 p.m.

Recorded by:

Alyssa Jaje
Community Development Specialist

ORDINANCE NO. 2020-06-031

AN ORDINANCE APPROVING THE CITY OF URBANA AND URBANA HOME CONSORTIUM (CHAMPAIGN/URBANA/CHAMPAIGN COUNTY) CONSOLIDATED PLAN FOR FISCAL YEARS 2020-2024 AND ANNUAL ACTION PLAN FOR FISCAL YEAR 2020-2021

WHEREAS, the City of Urbana has been designated an entitlement city under the Federal Housing and Community Development Act of 1974, as amended, and as such is eligible for Community Development Block Grant (hereinafter "CDBG") funds upon proper submittal being made to the United States Department of Housing and Urban Development (hereinafter "HUD"); and

WHEREAS, the City of Urbana has been designated lead entity for the Urbana HOME Consortium in accordance with the Cranston-Gonzales National Affordable Housing Act of 1990, as amended, and as such is eligible to receive HOME Investment Partnerships (hereinafter "HOME") funds on behalf of the City of Urbana, City of Champaign, and Champaign County; and

WHEREAS, on January 5, 1995, HUD published a final rule in the Federal Register requiring a five-year consolidated plan and annual action plans for all HUD community planning and development formula grant programs, consolidating into a single submission the planning, application, and reporting aspects of the CDBG, HOME, Emergency Shelter Grants, and Housing Opportunities for Persons With AIDS programs, and the Comprehensive Housing Affordability Strategy; and

WHEREAS, public hearings were held in neighborhood locations to solicit input on the Urbana Consortium and the City of Urbana Consolidated Plan for Fiscal Years 2020-2024 (hereinafter the "Consolidated Plan") and the City of Urbana Annual Action Plan for Fiscal Year 2020-2021 (hereinafter the "Annual Action Plan"); and

WHEREAS, the Urbana Grants Management Division staff, assisted by the Urbana Community Development Commission, has prepared the Consolidated Plan and Annual Action Plan for public review; and

WHEREAS, said Consolidated Plan and Annual Action Plan were placed on file for public review beginning March 1, 2020, and ending April 10, 2020; and

WHEREAS, the Urbana Community Development Commission held a public hearing on February 25, 2020 to receive comments on the Draft Consolidated Plan and Annual Action Plan; and

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF

URBANA, ILLINOIS, as follows:

Section 1. That the City of Urbana and Urbana HOME Consortium (Champaign/Urbana/Champaign County) Consolidated Plan for Fiscal Years 2020-2024 and Annual Action Plan for Fiscal Year 2020-2021, in substantially the form as attached hereto, are hereby approved.

Section 2. That the Mayor is hereby designated as the authorized representative of the City of Urbana to take any action necessary in connection with said Consolidated Plan and Annual Action Plan to implement the CDBG and HOME programs and to provide such additional information as may be required.

PASSED BY THE CITY COUNCIL this ___th day of ____, 2020.

AYES:

NAYS:

ABSTENTIONS:

Charles A. Smyth, City Clerk

APPROVED BY THE MAYOR this ___th day of ____, 2020.

Diane Wolfe Marlin, Mayor

RESOLUTION NO. 2020-06-25R

A RESOLUTION APPROVING A COVID-19 PROGRAM MANUAL

(Fiscal Year 2020-2024)

WHEREAS, in response to the deadly coronavirus (COVID-19) pandemic, the federal government has enacted legislation to reduce the economic impact of COVID-19 and protect the public health; and

WHEREAS, the Coronavirus Aid, Relief, and Economic Security (CARES) Act, P.L. 116-136, appropriates \$5 billion to the Community Development Fund, which the U.S. Department of Housing and Urban Development (HUD) administers to provide assistance to eligible communities for a broad range of community development needs in housing, infrastructure, revitalization, economic development and public social services; and

WHEREAS, the CARES Act directs HUD to allocate \$2 billion of such funds for additional support to Community Development Block Grant (CDBG) Program grantees; and

WHEREAS, HUD has offered CARES Act funds to the City of Urbana (City) to supplement its CDBG Program; and

WHEREAS, acceptance of such funds will enable the City to further offset the devastating impact of the COVID-19 pandemic on the community; and

WHEREAS, as a condition of accepting such funds, the City must adopt certain operational guidelines, as contained in the COVID-19 Program Manual (Fiscal Year 2020-2024) attached hereto; and

WHEREAS, after having reviewed such guidelines, the Community Development Commission and Grants Management Division recommend that the City Council approve the COVID-19 Program Manual; and

WHEREAS, the City Council, after due consideration, finds that the approval of the COVID-19 Program Manual is in the best interests of the residents of the City and is desirable for the welfare of the City's government and affairs.

NOW, THEREFORE, BE IT RESOLVED by the City Council, of the City of Urbana, Illinois, as follows:

Section 1.

A COVID-19 Program Manual (Fiscal Year 2020-2024), in substantially the form of the copy of said Manual attached hereto and hereby incorporated by reference, be and the same is hereby authorized and approved.

Section 2.

The Grants Management Division Manager, or her designee, is hereby authorized and directed to perform all acts as may be necessary on behalf of the City of Urbana to carry out the purposes and intent of this Resolution.

PASSED BY THE CITY COUNCIL this Date day of Month, Year.

AYES:

NAYS:

ABSTENTIONS:

City Clerk

APPROVED BY THE MAYOR this Date day of Month, Year.

Diane Wolfe Marlin, Mayor

RESOLUTION NO. 2020-06-024R

**A RESOLUTION APPROVING THE HOUSING
REHABILITATION PROGRAM OPERATIONAL
GUIDELINES PROGRAM YEARS 2020-2024**

WHEREAS, on February 2, 1976, the City Council of the City of Urbana, Illinois, adopted operational guidelines for the implementation of housing rehabilitation programs funded through the Community Development Block Grant program; and

WHEREAS, said operational guidelines have been amended by the City Council from time to time thereafter; and

WHEREAS, the Community Development Commission and Grants Management Division of the City of Urbana have revised housing program guidelines entitled Housing Program Manual 2020-2024 for the purpose of 1) administering the program years 2020-2024 housing programs funded in part with Community Development Block Grant funds, HOME Investment Partnership Program funds, and additional funding that may be available through Illinois Department of Public Health, Federal Home Loan Bank, Illinois Housing Development Authority, TIF, or other participating financial institutions to supplement the programs in the manual, 2) replacing previously adopted housing program guidelines which require revisions to clarify existing programs and conform to regulations and guidelines required by the funding source with the addition of programs to eliminating blight and dilapidated structures to help revive the neighborhood and promote owner-occupied properties; a copy of said housing program manual is attached hereto and incorporated herein by reference.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF

URBANA, ILLINOIS, as follows:

That the Grants Management Division of the City of Urbana is hereby authorized and directed to proceed with the implementation of the housing program guidelines in substantially the form as described in the attached Housing Program Manual 2020-2024, which is hereby approved.

PASSED BY THE CITY COUNCIL this ___th day of ____, 2020.

AYES:

NAYS:

ABSTENTIONS:

Charles A. Smyth, City Clerk

APPROVED BY THE MAYOR this ___th day of ____, 2020.

Diane Wolfe Marlin, Mayor



**COVID 19
POLICY & PROGRAM MANUAL**

City of Urbana Grants Management Division
COVID-19 Programs

prepared by
City of Urbana, Illinois

Funded by
United States Department of Housing and Urban Development

Approved by
Urbana City Council – Resolution No. _____

1.0 INTRODUCTION

1.1 Background

The Community Development Block Grant - CV (CDBG-CV) Program is a federal entitlement program authorized by the Housing and Community Development Act of 1974, as amended. The Program provides grants on a formula basis to entitled cities and counties to prepare, prevent, and respond to the COVID-19 pandemic.

The Department of Housing and Urban Development (HUD) is responsible for management and oversight of CDBG-CV Programs. Under the program, the City is responsible for deciding how the CDBG-CV and HOME funds will be used in its jurisdiction in response to the COVID-19 pandemic.

The HOME Program will fund the COVID-19 TBRA program. The program will be administered through the Champaign County Regional Plan Commission. Additional HOME funding was not provided, however, waivers to the program were requested and approved by HUD.

1.2 Programs

This manual contains guidelines for programs offered, as funding is available, by the City of Urbana during the period beginning April 5, 2020, and ending June 30, 2025. This manual only provides guidelines for the CDBG-CV funding.

- Housing Subsidy Assistance
- COVID-19 TBRA Program
- Small Business Program

Households assisted by the housing programs must meet federally mandated income guidelines for very-low, low, and moderate-income persons. The current figures are included as Exhibit B and are subject to periodic revision by the U.S. Department of Housing and Urban Development. Businesses assisted by the small business program must be located in the City of Urbana

1.3 Authorized Activities

In adopting this manual the Urbana City Council directs its Grants Management Division (GMD) to implement CDBG-CV programs as described herein. The Council authorizes the Manager of Grants Management Division to enter into contractual agreements with individual renters, property owners, and businesses to implement programs in accordance with these guidelines.

The Council directs the Grants Management Division to pursue additional funding that may be available to help fund the programs listed in the manual. Additional funding agents may include Tax Increment Finance (TIF), Federal Home Loan Bank (FHLB), Illinois Housing Development Authority (IHDA), or other participating financial institutions.

1.4 Conflict of Interest

Employees, agents, consultants, officers, elected officials, and appointed officials of the City Urbana who either 1) exercise functions or responsibilities with respect to CDBG-CV, 2) are in a position to participate in the decision-making process relative to CDBG-CV, or 3) may gain inside information

with regard to CDBG-CV, activities are ineligible for assistance through the housing program. Such persons include, but are not limited to, the Mayor, City Council Members, Community Development Commission members, the City Administrator, Comptroller, City Attorney, Community Development Services Director, and all Grants Management Division staff. However, HUD may grant an exception to this rule on a case-by-case basis upon filing by the Grants Management Division of 1) disclosure of the conflict, 2) an assurance that public disclosure of the conflict has been made, and 3) a legal opinion that the interest would not violate state or local law. City employees who are not otherwise excluded by this conflict of interest provision are eligible to apply for housing assistance.

1.5 General Guidelines

The City's Grants Management Division shall generally process applicants for assistance through programs described in this manual on a first-come/first-served basis. The demand for assistance through these programs may exceed the availability of funds or staff time to process all cases. The Grants Management Division may institute a prioritization system on either a temporary or permanent basis to determine the order in which projects will be funded. Any such prioritization system shall give highest priority for funding to persons of lowest income and greatest need.

The City of Urbana recognizes it may be relevant to make a conditional change to the outlined program guidelines throughout the program years in the manual. In these instances, GMD shall submit the reason or reasons for the conditional change for that specific program. The Community Development Commission (CDC) may authorize GMD to proceed with the changes to the program with a majority vote of a CDC quorum.

Record Retention for all CDBG-CV programs will follow the CDBG and HOME regulation requirements.

1.6 CDBG Waiver

On April 5, 2020, the City of Urbana requested the following waivers for the CDBG-CV funded programs:

- Suspend the 15 percent cap on public service activities for FY 2019/20, CDBG-CV and FY 2020/21 to prevent, prepare for, and respond to the pandemic.
- Ability to use CDBG-CV funds to cover or reimburse allowable costs to prevent, prepare for, and respond to the pandemic.
- Permission to amend the Citizen Participation Plan and FY 2019/20 AAP with a reduced public comment period of no less than five days (public comment period running concurrently for AAP and CPP).
- Ability to meet public hearing requirements with virtual meetings and reasonable public notice.
- Waive the August 16, 2020, deadline to submit the Consolidated Plan and 20/21 Annual Action Plan.

The City of Urbana requested these waivers remain in place for the term allowable by HUD.

**EXHIBIT A: CITY OF URBANA DEPARTMENT OF COMMUNITY DEVELOPMENT SERVICES
GRANTS MANAGEMENT DIVISION (GMD) HOUSING PROGRAMS TO ADDRESS COVID-19**

PROGRAM	PURPOSE	ELIGIBILITY AREA	INCOME ELIGIBILITY	MAXIMUM AMOUNT	UNDER-WRITING CRITERIA
Housing Assistance Grant	Provide grant assistance to an income-eligible homeowner or renter for mortgage, rent, or utility assistance for the prevention of homelessness.	Citywide	0 – 80% MFI	Grant assistance up to a maximum of \$750 month not to exceed three months	GMD
COVID-19 TBRA Assistance	Provide rent and utility assistance for an income eligible tenant for the prevention of homelessness.	Countywide	0 – 60% MFI	Grant assistance through 12/31/2020 unless extended by HUD	Champaign Co Regional Planning Commission
Small Business Assistance Grant	Provide grant assistance to businesses for operating capital, renovations, and/or retooling.	Citywide	0 – 80% MFI	Grant assistance up to a maximum of two months working capital not to exceed \$10,000.	GMD

EXHIBIT B

Median Family Income Limits 2020

Median=\$83,600*

Family Size	30% MFI	50% MFI	60% MFI	80% MFI	MFI
1 person	17,600	29,300	35,150	46,850	58,600
2 persons	20,100	33,450	40,200	53,550	66,900
3 persons	22,600	37,650	45,200	60,250	75,300
4 persons	26,200	41,800	50,150	66,900	83,600
5 persons	30,680	45,150	54,200	72,300	90,300
6 persons	35,160	48,500	58,200	77,650	97,000
7 persons	39,640	51,850	62,600	83,000	103,700
8 persons	44,120	55,200	66,250	88,350	110,400

Rounded to the nearest \$50

*Effective 4/14/2020

2.0 DEFINITIONS

Duplication of Benefits (DOB): To comply with the Stafford Act, assistance shall be provided to a person or entity only to the extent that the person or entity has a need that has not fully been met.

Good Standing: A business that is up to date on filing the state reports, obtaining its state licenses and permits, paying its state taxes and fees, and complying with other statutory rules for operating the business in the City of Urbana.

Grants Management Division (GMD): The division responsible for administering the Community Development Block Grant Program (CDBG) and HOME Program for Urbana and coordinating all CDBG/HOME activities. GMD is a division of the Urbana Department of Community Development Services.

Gross Annual Income: Annual income is the gross amount of income anticipated by all adults in a family during the 12 months following the effective date of determination. To calculate annual gross income the Department of Housing and Urban Development's Part 5 definition is used for all programs. See Appendix I for the complete HUD Part 5 income inclusions and exclusions.

Household: All persons who occupy a housing unit at the time the application is taken. GMD staff shall use the guidelines provided by the HUD Part 5 definition of household to determine whether or not persons with an ownership interest in the property who do not reside at the property shall be considered to be an "occupant" of the household for the purposes of determining household eligibility. Regardless of whether such individuals are counted as household members, they will be required to sign all applicable documents in order to be eligible for City programs.

Minority/Female Owned Business: A firm in which more than half of the assets are owned and controlled by a minority or female person or persons.

Net Income: Net income is identified on the Profit and Loss Statement of a business Or Line 31 of Schedule C for self-employed or sole proprietorships.

Operating Capital: Assets minus liabilities on a balance sheet

Self-Certification of Income: A written statement of anticipated income along with a certification that the information is complete and accurate.

TBRA: Tenant Based Rental Assistance provides short-term rental assistance to eligible participants located in the City of Urbana, City of Champaign, and unincorporated Champaign County.

3.0 PROGRAM OBJECTIVES

The City of Urbana CDBG-CV Programs are designed to further the following objectives:

- 1) To use state, federal, and other grant funding including but not limited to Community Development Block Grant (CDBG) and CDBG-CV, HOME, Illinois Housing Development Authority (IHDA), and Federal Home Loan Bank (FHLB) funds as a catalyst to address the impact on residents and businesses to improve the community
- 2) To revitalize, modify, and/or preserve existing small businesses
- 3) To enable low-income families who have been impacted by the COVID-19 pandemic assistance to maintain housing
- 4) To further implement the goals of the City's Consolidated Plan.

4.0 Housing Assistance Program Objectives

Subsistence payments for one to three months emergency payments on behalf of individuals or families. A grant is made available to provide funding for direct rental, mortgage, and utility assistance to those who have lost their job, been furloughed, or had their hours reduced.

4.1 Eligible and Ineligible Households

Eligible households include:

- Households experiencing loss of income directly related to COVID-19
- Households in good standing with the rent, mortgage, and utilities as of March 2020
- Households who requested assistance from lender, landlord, and/or utility companies
- Households with incomes at or below 80% AMI

Ineligible households include:

- Households with a Tenant based voucher
- Households residing in Project Based Voucher projects
- Households residing in Public Housing
- Households receiving other government-based rental assistance

Priority is placed on households with the lowest median family income.

4.2 General Terms and Conditions

- 1) The applicant may apply for housing assistance through the CDBG-CV Housing Assistance Program if they have not received assistance from federal, state, or local resources to meet their need. However, so as not to receive a duplication of benefit (DOB), the applicant may receive assistance through the program if the amount received did not cover all their housing need.
- 2) The Housing Assistance Program may not exceed three months of assistance. If assistance is needed beyond this, applicant will be referred to other available programs.
- 3) The applicant shall not be required to pay for administrative and program delivery expenses related to processing of the application.
- 4) Grant funds will be paid directly to the lender, landlord, and/or the utility company(ies).
- 5) Before funding can be executed, the applicant must provide evidence from the landlord/mortgage lender that she/he/they were current on obligations as of March 2020.
- 6) A maximum of \$750 per month will be provided for both utility and housing assistance for a maximum of three months.
- 7) The program will not reimburse individuals.

4.3 Eligibility Criteria

For a household to qualify for assistance through the CDBG-CV Housing Assistance Program, they must meet the following criteria:

- 1) Priorities shall be given to applicants on a first come/first served basis. If necessary, funding may be prioritized to the lowest income individuals.
- 2) Be classified as a low- moderate income individual as determined by the Department of Housing and Urban Development.

For an applicant to qualify for Housing Assistance, he/she must meet the following criteria:

- 1) The applicant must have been negatively impacted by the COVID-19 pandemic.
- 2) The applicant must be the person or persons in whose name the utilities, lease, or title to the property is vested.
- 3) The anticipated household annual (gross) income shall not exceed 80 percent of the median family income for Champaign County as released by HUD. The temporary \$600 weekly unemployment benefit should not be included as part of anticipated income.
- 4) The HUD Part 5 definition of annual (gross) income shall be the method used in calculating annual income.

4.4 Processing Procedures

This section outlines procedures for preparing, processing, and approving an application for housing assistance.

4.4.1 Application Process

- 1) GMD staff shall interview and advise the applicant of the design and objectives of the housing assistance program, the availability and benefits of housing assistance, and the specific terms and conditions under which assistance is provided.
- 2) GMD staff shall obtain the following information from and about the applicant and the subject dwelling:
 - a) Verification of employment.
 - b) Self-certification of earnings and assets
 - c) Verification of lease.
 - d) Verification of mortgage or deed of trust from each holder of a lien secured by the property.
 - e) Verification of utilities.
 - f) If applicable, the applicant may be placed on a prioritization list created by the GMD based on household income and need.

4.4.2 Housing Assistance Determination

After review of the application documentation and determination of need, the applicant will be notified of the amount of assistance and start date.

4.5 Close Out Procedures

GMD staff shall give the recipient a copy of the assistance provided. Applicant will sign written statement on verification of income and duplication of benefits requirement.

- 1) GMD staff shall request that the recipient complete and return a questionnaire pertaining to the program delivery.
- 2) GMD staff shall add information on the case to the Community Development Property Log.

5.0 TENANT BASED RENTAL ASSISTANCE - COVID-19 Tenant Based Rental Assistance (COVID-19 TBRA)

Program Objectives: COVID-19 TBRA assistance is a temporary housing subsidy program for individuals and families affected by COVID-19. The goal for all households served is to be able maintain their residence once the COVID-19 TBRA assistance ends and pay full market price for their rent. COVID-19 TBRA assistance is provided for the term provided by the Department of Housing and Urban Development. The program will be administered by the Champaign County Regional Plan Commission (CCRPC). Tenants must contribute 30% of their adjusted monthly income toward their rent or a minimum of \$25 per month (whichever is greater).

5.1 Participant Eligibility

To be eligible to apply for the COVID-19 TBRA program, applicants must meet the following qualifications:

- Households must live in Champaign County.
- Household income must be at or below 60% Area Median Income (AMI) for Champaign County.
- The rent assistance calculation must result in a minimum rental subsidy payment of \$100 per month.
- Households with another housing subsidy are not eligible. Prior to COVID-19 shelter in place order on March 21, 2020, applicant must have been employed and working a minimum of 30 hours per week.
- Priority is given to families with children (under age 18). If all eligible families are served, individuals without dependent children will be considered.

5.2 Supporting Documentation

The following documents must be provided at the time of application:

- Copy of Photo ID for all household members.
- Copy of Social Security cards for all household members.
- Proof of earned income, including hours worked, for 90 days prior to March 21, 2020.
- Documentation of last 90 days of income for all household members that reflects loss of earned income.
- Documentation of last 90 days of childcare expenses, if applicable.

5.3 Length of Assistance

COVID-19 TBRA assistance is through December 31, 2020 unless extended by HUD.

5.4 Type of assistance

CCRPC's COVID-19 TBRA Program can assist only with rent. For eligible clients enrolled in the COVID-19 TBRA, CCRPC's COVID-19 TBRA Program can also assist with a security deposit. The maximum amount of funds that may be provided for the security deposit is the equivalent of two months' rent for the unit.

5.4.1 Client Contribution

Client must pay 30% of adjusted monthly income toward their rent or a minimum of \$25 per month (whichever is greater). CCRPC pays the remainder of the rent, directly to the landlord.

5.5 Procedures

CCRPC's COVID-19 TBRA Program will accept referrals from City of Urbana, City of Champaign, Cunningham Township, and/or Champaign Township.

- When COVID-19 TBRA funds are available, the Program Manager or COVID-19 TBRA Case Manager will send out an email to the eligible referring program's Program Managers indicating such.
- Case Manager from the referring program must first verify client meets basic eligibility criteria listed above (Participant Eligibility).
- Case Manager from referring program works with the client to complete COVID-19 TBRA application.
- Case Manager from referring program emails COVID-19 TBRA Case Manager completed COVID-19 TBRA application.
- COVID-19 TBRA Case Manager reviews COVID-19 TBRA application to ensure eligibility and proceeds with the COVID-19 TBRA intake process when eligibility is confirmed.
- When all remaining funds are allocated, Program Manager or COVID-19 TBRA Case Manager will email eligible referring program's Program Managers to let them know they cannot accept any further COVID-19 TBRA referrals.

5.6 COVID-19 TBRA Program Waivers

On April 5, 2020, the City of Urbana requested the following waivers for the COVID-19 TBRA Program.

1. Ability to increase the administrative cap to not exceed 25%.
2. Eliminate the 25% match requirement for HOME funds expended between 10/1/2019 through 9/30/2021.
3. Ability to amend the 19/20 Consolidated Plan without completing an analysis of local market conditions before implementing a TBRA program.
4. To waive rent reasonableness to have the ability to provide rental assistance to individuals and families seeking housing and assist individuals and families that have housing but are experiencing reduced or lost wages, without requiring an assessment of rents charged for comparable unassisted rental units.
5. Eligible Tenant-Based Rental Assistance & Maximum TBRA Subsidy to allow the consortium the ability to pay the full cost of monthly utilities in addition to rental assistance and security deposit payments for new and existing TBRA families affected by the Covid-19 pandemic.
6. The ability to waive the utility allowance for different types and sizes of units in the TBRA program.
7. Permission to waive the term of the rental assistance contract to begin on the first day of the term of the lease.
8. The ability to waive the tenant protections lease and lease term to allow the consortium to assist individuals currently housed but facing hardship where an executed lease is already in place. The consortium will execute a rental assistance contract with the tenant to not exceed the period approved by HUD.
9. Waive the requirement to complete HQS inspections of TBRA units which will allow the consortium to rapidly house or assist individuals affected by the pandemic.
10. Waive the requirement that annual inspections of units occupied by recipients of HOME TBRA.
11. Suspend the requirement to establish written tenant selection criteria for the TBRA program.

12. Waive the requirement to require two months of source documentation to determine income. The consortium will require a written statement of anticipated income along with a certification that the information is complete and accurate.

The waivers were requested to allow for flexibility in administering the program and to provide the greatest assistance to the community.

5.7 COVID-19 TBRA Case Manager Support

The COVID-19 TBRA Case Manager will provide the following services to clients enrolled in the COVID-19 TBRA program:

- Determine COVID-19 TBRA eligibility (see Participant Eligibility above).
- Complete all required COVID-19 TBRA paperwork:
 - Application for Rent Assistance (referring case manager and client complete)
 - Completed Income Calculation
 - Verification of Employment
 - Non-Income Affidavit, if applicable.
 - COVID-19 TBRA Income Limits (60% AMI or below)
 - Approval OR Denial Letter
 - Client Rent Calculation Worksheet and Maximum Allowance Rent (need to submit to CCRPC fiscal)
 - Subsidy Award Letter (need to submit to CCRPC fiscal)
 - Utility Allowances
 - COVID-19 TBRA Information for Landlords (CCRPC provide to landlord)
 - Lead Based Paint Pamphlet (provided to client)
 - Lead Based Paint Disclosure Form (signed by client, landlord, and CCRPC)
 - Lease Addendum (landlord, client, CCRPC sign)
 - Payments Contract (landlord and CCRPC sign; need to submit to CCRPC fiscal)
 - W-9 (landlord complete)
 - Release of Information (client sign for landlord)
 - Notice of Occupancy Rights Under the Violence Against Women Act (provided to all clients)
 - Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (only completed by client if they are seeking Violence Against Women Act protections)

At the request of the applicant, the Case Manager will provide at least quarterly support services.

5.8 Enrollment (clients looking for a new unit)

Once a client is approved for the COVID-19 TBRA program, the enrolled COVID-19 TBRA client will search for an appropriate unit in Champaign County that is not more than Fair Market Rent (FMR) for Champaign County as published by the Department of Housing and Urban Development (HUD). Clients have 30 days from receipt of the COVID-19 TBRA approval letter to find a suitable unit. When the client identifies an appropriate unit, the Landlord and the client must complete the Request for Unit Approval form and the client will provide the landlord with CCRPC's COVID-19 TBRA Information for Landlords sheet. The following information is to be submitted by the approved COVID-19 TBRA client to the COVID-19 TBRA Case Manager within 30 days of client receiving COVID-19 TBRA approval letter:

- Request for Unit Approval
- Release of Information for Landlord

When a unit approval is not received within 30 days of approval, the COVID-19 TBRA Case Manager will send a voucher expired letter to the client and retain in the client file.

5.9 Enrollment (clients maintaining current unit)

Once a client is approved for the COVID-19 TBRA program and wishes to continue to reside in their current unit, the Landlord and the client must complete the Request for Unit Approval form. The client will provide the landlord with CCRPC's COVID-19 TBRA Information for Landlords sheet. The following information is to be submitted by the approved COVID-19 TBRA client to the COVID-19 TBRA Case Manager within 30 days of client receiving COVID-19 TBRA approval letter:

- Request for Unit Approval
- Release of Information for Landlord

When a unit approval is not received within 30 days of approval, the COVID-19 TBRA Case Manager will send a voucher expired letter to the client and retain in the client file.

5.10 Rent Calculation Worksheet

The COVID-19 TBRA Case Manager will review the Request for Unit Approval for appropriateness and complete the Rent Calculation Worksheet form.

5.11 Unit Inspection

If the new unit is approved, the COVID-19 TBRA Case Manager will:

- Forward via email the completed Request for Unit Approval as an attachment to the Housing Service Inspector and include the following information in the body of the email –
 - Program: COVID-19 TBRA
 - # of Children Present Under 6:
 - Initial Inspection or Special Inspection:
 - New Unit or Client Already in Unit:
 - Current Lease Ends:
- Provide the landlord with the Initial Unit Inspection Letter.

The Housing Services Inspector arranges an inspection with the Landlord and determines whether the unit meets the applicable local and federal codes by completing the Uniform Physical Condition Standards (UPCS) Inspection Checklist form.

5.11.1 Passed Inspections

If the unit passes inspection, the Inspection Checklist and Report are forwarded to the COVID-19 TBRA Case Manager who will send the passed Inspection Results Letter to the Landlord. The COVID-19 TBRA Case Manager should then contact the client and landlord to arrange for a lease signing.

Once the unit passes inspection, the COVID-19 TBRA Case Manager will also complete the Subsidy Award Letter and provide a copy to the client, landlord, and CCRPC fiscal.

5.11.2 Discrepancies

If the unit does not pass the initial inspection, the Housing Services Inspector will provide the Inspection Checklist and Report noting deficiencies to the COVID-19 TBRA Case Manager. The COVID-19 TBRA Case Manager will immediately send an Inspection Results letter to the landlord and client with a copy of the report enclosed.

The Landlord is given five business days to correct the deficiencies and contact the Housing Service Inspector to schedule a re-inspection once the repairs are made. All contact with the landlord should be noted in the client file. Once passed, the Housing Services Inspector should forward the revised Inspection Report to the COVID-19 TBRA Case Manager.

If the Landlord and / or Tenant do not respond within five business days, the COVID-19 TBRA Case Manager will send a second discrepancy letter.

In the event the Landlord is unable or unwilling to correct the deficiencies, or five business days have passed with no contact, the COVID-19 TBRA Case Manager instruct the client to look for a new unit.

5.12 Entering into the Lease Agreement

The COVID-19 TBRA Case Manager will prepare the Payments Contract and Lease Addendum using information from the Request for Unit Approval, Rent Calculation & Unit Approval spreadsheets.

The COVID-19 TBRA Case Manager meets with the Tenant and Landlord for signatures and to obtain the following documents:

- Lease Addendum
- Payments Contract
- W-9 Form
- Client's lease (copy only, client retains original)

The lease will be provided by the Landlord and signed by both the landlord and the client. The COVID-19 TBRA Lease Addendum is provided by CCRPC and signed by the landlord and the client. The Payments Contract is provided by CCRPC and signed by the COVID-19 TBRA Case Manager and the landlord. The COVID-19 TBRA Case Manager must include a blank copy of a W-9 form to be completed by the landlord if not currently on file at CCRPC. Information on these forms should be consistent, especially regarding the names of residents, monthly rent amount and dates of tenancy. The Lease and Payments Contract must end on the last day of the month. These documents will be placed in the client's file.

The COVID-19 TBRA Case Manager will provide copies to fiscal department for the payment request of the following:

- Subsidy Award Letter

- Rent Calculation Worksheet
- Payments Contract
- W-9 Form

5.13 Property Maintenance

Property should be kept up to standards during the lease. If the client or landlord reports a problem with the property, the COVID-19 TBRA Case Manager should review the lease with the client to determine who is responsible for the problem. If the problem is the client's responsibility and determined both accurate and reasonable by the COVID-19 TBRA Case Manager, the COVID-19 TBRA Case Manager should work with the client on a reasonable plan for rectifying the problem within five business days. If the problem is not rectified and the landlord has reasonable cause for evicting the tenant, the COVID-19 TBRA voucher will be forfeited. If the complaint is inappropriate, the COVID-19 TBRA Case Manager should connect the tenant with the Tenant Union and / or affordable legal assistance (i.e. Land of Lincoln Legal Aid, U of I Law Clinic) for guidance. If the problem is the responsibility of the landlord, the COVID-19 TBRA Case Manager should assist have the client contact the Landlord. If issue is landlord's responsibility and is not rectified, the COVID-19 TBRA Case Manager should assist the Client in completing a Request for Special Inspection.

To arrange for an inspection, the COVID-19 TBRA Case Manager must send a Special Inspection letter to the Landlord (cc: client) and email the Housing Services Inspector with attached a Special Inspection Request and Special Inspection letter.

If the unit passes the special inspection, the report is returned to the COVID-19 TBRA Case Manager for filing. The COVID-19 TBRA Case Manager will prepare and send a Passed Inspection Letter to landlord and client.

If the unit does not pass the special inspection, the Housing Services Inspector will provide an Inspection Checklist and Report noting deficiencies to the COVID-19 TBRA Case Manager. The COVID-19 TBRA Case Manager will send an Inspection Deficiencies Letter to the Landlord, who is then allotted five business days to correct the listed deficiencies and contact the Housing Services Inspector to schedule a re-inspection. The COVID-19 TBRA Case Manager should act as a liaison by encouraging the Landlord to repair deficiencies, noting all contact in case notes. Once passed, the Housing Services Inspector should forward the revised Inspection Report to the COVID-19 TBRA Case Manager. If the Landlord does not respond within five business days, the COVID-19 TBRA Case Manager will send a second Discrepancy Letter.

In the event the Landlord is unwilling or unable to correct the deficiencies or five business days pass with no contact, the COVID-19 TBRA Case Manager should send client Failure to Repair / Seek New Unit Letter and the COVID-19 TBRA Case Manager should assist the client to search for a different unit. In the event the client cannot afford to or does not want to move, the COVID-19 TBRA Case Manager should advocate for client regarding assistance from appropriate city or county to persuade landlord to make repairs otherwise the client will forfeit the COVID-19 TBRA voucher.

5.14 Contract Termination

A COVID-19 TBRA contract will be terminated, with the client and landlord forfeiting any remaining subsidy, if the client refuses to move from a unit that has not passed inspection, is evicted from their

current unit, or is incarcerated or enrolled in an inpatient treatment program for longer than 60 days. The COVID-19 TBRA Case Manager will send the client and landlord a Termination of Payment Contract letter and subsidy will end immediately.

Appendix A: Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

Note to Owners/Agents

- This IHDA model Emergency Transfer Plan is based on the HUD-issued model but includes additional VAWA regulatory requirements and recommended provisions.
- Owner/Agent adoption of this IHDA-model plan is strongly recommended to facilitate appropriate compliance including but not limited to ensuring tenant qualification for said transfers.
- In cases where tenant eligibility under the plan is uncertain, the Owner/Agent should contact their designated MOR/Asset Manager or Tax Credit Compliance Officer for guidance.
- As of June 14, 2017, the following Attachments will be available at IHDA's website:
 - Attachment A: VAWA ETP Resource Guide – a list of Illinois organizations providing services for victims of Domestic Violence
 - Attachment B: VAWA ETP Housing Provider List – a list of Illinois assisted housing providers.

Projects funded through the Champaign County HOME Consortium must adhere to HUD regulations.

HOME Consortium-funded projects can have alternative standards / policy, if these are of a higher standard than this plan and exist in a written form that will be made available for review.

Failure to adhere to HUD required policies will result in termination of the project and potential repayment of grant funding.

Emergency Transfers

The City of Urbana is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA), 1. COVID-19 TBRA -funded projects allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation. 2 The ability of COVID-19 TBRA -funded projects to honor such requests for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether the COVID-19 TBRA funded project has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that HUD-assisted properties follow VAWA. IHDA will assess VAWA compliance including but not limited to the Emergency Transfer Plan requirements during regular monitoring.

Eligibility for Emergency Transfers

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains

within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

Emergency Transfer Request Documentation

To request an emergency transfer, the tenant shall notify the staff of the COVID-19 TBRA -funded project and submit a written request for a transfer. COVID-19 TBRA -funded projects will provide reasonable accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

- A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under COVID-19 TBRA -funded project's program; OR
- A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.

Confidentiality

COVID-19 TBRA -funded projects will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives COVID-19 TBRA -funded projects written permission to release the information on a time limited basis, or unless disclosure of the information is required by law, or required for use in an eviction proceeding or hearing regarding ¹termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the Notice of Occupancy Rights under the Violence Against Women Act for All Tenants for more information about the COVID-19 TBRA -funded project's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

Emergency Transfer Timing and Availability

COVID-19 TBRA -funded projects cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. COVID-19 TBRA -funded projects will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. COVID-19 TBRA -funded projects may be unable to transfer a tenant to a unit if the tenant has not or cannot establish eligibility for that unit.

If COVID-19 TBRA -funded projects has no safe and available units for which a tenant who needs an emergency is eligible, CSPH-funded projects will assist the tenant in identifying other Owner / Agents who may have safe and available units to which the tenant could move. At the tenant's request, COVID-19 TBRA -funded projects will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

Emergency Transfers in Cases Where a Safe Unit Is Not Immediately Available

If the COVID-19 TBRA funded project does not have a safe unit immediately available for an internal emergency transfer, the victim will be placed on the Emergency Transfer Waitlist, if the COVID-19 TBRA funded project chooses to create/manage such a waitlist. Tenants on the Emergency Transfer Waitlist, if it exists, will take precedence over applicants on other property waitlists.

If the COVID-19 TBRA funded project has no safe and available units for which an existing tenant who needs an emergency transfer is eligible, a tenant may also request an External Emergency Transfer. A tenant may choose to pursue both an Internal and an External Transfer at the same time.

COVID-19 TBRA funded projects will take the following steps to assist the tenant with an external emergency transfer.

- COVID-19 TBRA funded projects will provide the victim with a list of other HUD-assisted Owner/Agents under IHDA's jurisdiction including unit size, preferences and contact information.
- At the tenant's request, COVID-19 TBRA funded projects will assist tenants in contacting one or more of those providers.
- COVID-19 TBRA funded projects will assist in arrangements with the other provider to facilitate the move. In particular, IHDA or Owner / Agent will request the tenant's permission to share tenant files with the other provider. If the tenant provides written consent to do so, and any applicable confidentiality requirements are met, COVID-19 TBRA -funded projects will share documentation from the tenant's current file in order to expedite a tenant's new application process.

If the COVID-19 TBRA funded project is contacted by another Owner / Agent, or tenant of another provider's housing seeking an Emergency Transfer, COVID-19 TBRA funded projects will take the following steps:

- Give the transfer priority over other kinds of transfer, second only to the priority for internal transfers and accessible units described below.
- Expedite the application / screening process using any documentation from the tenant's existing file that the other provider is able to make available.

In all cases of both Internal and External Emergency Transfer, COVID-19 TBRA funded projects will give the victim the names, addresses, and phone numbers of domestic advocacy organizations that stand ready to assist VAWA victims on an emergency basis to help them.

Priority of VAWA Emergency Transfers over Other Categories of Emergency Transfer

In general, COVID-19 TBRA funded projects will prioritize needs of existing tenants over external transfers, and opportunities to maximize use of accessible units (see next section). The order for priority of VAWA Emergency Transfers will be as follows:

- First priority will go to Internal Emergency Transfers, including VAWA Emergency Transfers. Priority among VAWA Emergency Transfers and other non-VAWA Emergency Transfers will be evaluated on a case-by-case basis if such conflicts arise.
- Second priority will go to other Internal Transfers that are not emergencies.
- Third priority will go to External VAWA Emergency Transfers.

Accessible Units

In order to meet the requirements of HUD Section 504 to maximize use of accessible units by those who need accessibility features, COVID-19 TBRA funded projects will apply the following order of priority for Accessible Units only:

- First priority will go to a current occupant of the property who needs the accessibility features of the vacant unit.
- Second priority will be to an eligible qualified individual on the waiting list who needs accessible features.
- Third priority will go to individuals without disabilities who need an emergency transfer under VAWA.

Policies for Tenants with Tenant Based Assistance

The measures and priorities covered under this Emergency Transfer Plan apply to households with tenant-based housing assistance in the same manner that they apply to other households covered by this plan. Under 24 CFR 982.353 and 354, PHAs must issue the victim a voucher allowing the victim to search for another unit in its jurisdiction, or begin the portability process if the victim wishes to move outside of the PHA's jurisdiction.

COVID-19 TBRA funded projects will apply the same priorities for Emergency Transfer to place tenants with tenant-based vouchers as quickly as possible, and wherever possible, prior to the expiration of any deadlines for using the voucher that may be imposed by the PHA.

Safety and Security of Tenants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe. Again, tenants should be provided with the contact information for local domestic violence services, sexual assault prevention services, or other appropriate referrals.

6.0 SMALL BUSINESS ASSISTANCE PROGRAM

The Small Business Assistance Grant is available to businesses located in the City of Urbana to provide working capital for operating, rehabilitation, and/or retooling assistance to those considered non-essential businesses during the COVID-19 pandemic. Subsidy payments not to exceed \$10,000 may be available. Businesses should have a solid commitment to remain open or reopen and retain or re-employ permanent jobs.

The CDBG-CV grant funding must benefit individuals with low and moderate income (LMI). This requirement is met by:

- The business owner receiving the CDBG grant funding qualifies as an LMI person **and** has no more than four (4) other employees. LMI qualifications are based on family size and income and can be determined in the application process; or
- If the business retains current employees, the business must certify that the jobs being retained with CDBG grant funding would be lost without assistance from the grant programs **and** that 51% or more of the employees being retained qualify as an LMI person; or
- If the business creates new jobs, the business must hire or make at least 51% of its new jobs “available to” LMI individuals. “Available to” means: (1) the job does not require special skills or a particular level of education, **and** (2) the business has agreed to hire LMI persons and train them for the jobs. Business owners will be asked to certify LMI qualifications of employees or job availability in the application process.

6.1 Eligible and Ineligible Businesses

Eligible Businesses

- Businesses experiencing loss of revenue as a result of the COVID-19 pandemic
- Retail and Service businesses located in the City of Urbana
- Businesses in good standing as of March 31, 2020 (see definitions)
- Businesses who have a certificate of occupancy issued by the City of Urbana
- Businesses with 15 or less full time equivalent (FTE) employees

Ineligible Businesses

- Real estate firms
- Businesses who have received other federal or state assistance e.g. PPP, Small Business Loans, etc.
- Financial services
- Seasonal businesses
- Banks
- Businesses that involve the sale of medical or recreational cannabis
- Private club or business that limits membership for reasons other than capacity
- Businesses deemed ineligible by the Department of Housing and Urban Development or the City of Urbana

Priority is placed on businesses retaining the greatest number of full time equivalent employees and those not able to operate fully during the stay-at-home order.

6.2 General Terms and Conditions

- 1) The applicant may apply for small business assistance through the CDBG-CV program if they have not received assistance from federal, state, or local resources to meet their need. However, so as not to receive a duplication of benefit (DOB), the applicant may receive assistance through the program if the amount received did not cover all their business need.
- 2) The Small Business Assistance Program will be limited to two months of operating assistance not to exceed \$10,000. If assistance is needed beyond this, applicant will be referred to other available programs.
- 3) The applicant shall not be required to pay for administrative and program delivery expenses related to processing of the application.
- 4) Grant funds will be paid directly to the approved applicant.
- 5) Before funding can be executed, the applicant must provide financial documents to evidence impact of the COVID-19 pandemic.
- 6) Grant Recipients will be required to submit documentation for proof of expenditures.
- 7) The funded business will sign a subrogation agreement stating it will return to the City any funds received from other sources that duplicate the benefit received from CDBG-CV funds.
- 8) The Small Business Association will assist businesses in creating financial statements and profit and loss statements.
- 9) Should funding become limited, the following criteria will be utilized to prioritize applications:
 - Minority and women owned business applicants.
 - The number of jobs retained as of the date of the application, as well as, the number of jobs that are planned to be rehired due to the assistance from the City and other federally-funded programs.
 - The degree to which the business has been directly impacted by new public health requirements (social distancing) related to the COVID-19 pandemic. Applicants should provide a description of how their business has been impacted within their application and have additional documentation available upon request such as profit/loss statements to support such claims.

6.3 Eligibility Criteria

For a business to qualify for assistance through the CDBG-CV Small Business Assistance Program, they must meet the following criteria:

- 1) The applicant must be the owner of the business.

- 2) Grant funds may be used for:
 - a. Employee wages and benefits (including fringe benefits associated with employment, such as health insurance)
 - b. Accounts payable
 - c. Rent
 - d. Utilities
 - e. Personal Protective Equipment
 - f. Signage
 - g. Business modifications or retooling to meet new social distancing standards
 - h. Other COVID-19-related costs
- 3) Business must show the impact of COVID-19 through the most recent financial statements.
- 4) Provide payroll or other documentation to show history of employees on payroll.
- 5) Priorities shall be given to minority and women owned business applicants on a first come/first served basis. If necessary, funding may be prioritized to the business retaining greatest number of low – moderate-income FTE employees.
- 5) The HUD Part 5 definition of annual (gross) income shall be the method used in calculating annual income of employees.

6.4 Processing Procedures

This section outlines procedures for preparing, processing, and approving an application for small business assistance.

6.5 Application Process

Applicants will apply through an on-line application system.

- 1) GMD staff shall interview and advise the applicant of the design and objectives of the Small Business Assistance program, the availability and benefits of the assistance, and the specific terms and conditions under which assistance is provided.
- 2) GMD staff shall obtain the following information from and about the subject business:
 - a) Verification of past two years of net income
 - b) Certification of earnings and assets
 - c) Verification of working capital
 - d) Most current bank statement
 - e) Other documentation to show need such as utility notices, denied loan application, etc.
 - f) A list of all employees as of January 1, 2020 along with their current status
 - g) Alternative documentation may be provided on a case by case basis
- 3) Applicants will be reviewed for project need, financial viability, and commitment for job retention.

6.6 Small Business Assistance Determination

After review of the application documentation and determination of need, the applicant will be notified of the amount of assistance and start date. Funds will be provided for 60 days of verifiable working capital up to a maximum of \$10,000.

6.7 Close Out Procedures

GMD staff shall give the recipient a copy of the assistance provided. Applicant will sign written statement on verification of income and duplication of benefits requirement.

- 1) GMD staff shall request that the recipient complete and return a questionnaire pertaining to the program delivery.
- 2) GMD staff shall add information in the IDIS HUD system.

APPENDIX I: HUD PART 5 INCOME DEFINITIONS

HUD Part 5 Income Inclusions:

- 1) The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services (before any payroll deductions).
- 2) The net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness cannot be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight-line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family.
- 3) Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation is permitted only as authorized in number 2 above. Any withdrawal of cash or assets from an investment will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested by the family. Where the family has net family assets in excess of \$5,000, annual income shall include the greater of the actual income derived from all net family assets or a percentage of the value of such assets based on the current passbook savings rate, as determined by HUD.
- 4) The full amount of periodic payments received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts, including a lump-sum amount or prospective monthly amounts for the delayed start of a periodic payment (except Supplemental Security Income (SSI) or Social Security).
- 5) Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation and severance pay (except for certain exclusions, as listed in paragraph 3 under Income Exclusions).
- 6) Welfare Assistance. Welfare assistance payments made under the Temporary Assistance for Needy Families (TANF) program are included in annual income:
 - a) Qualify as an assistance under the TANF program definition at 45 CFR 260.31; and
 - b) Are otherwise excluded from the calculation of annual income per 24 CFR 5.609(c).
 - c) If the welfare assistance payment includes an amount specifically designated for shelter and utilities that is subject to adjustment by the welfare assistance agency in accordance with the actual cost of shelter and utilities, the amount of welfare assistance income to be included as income consists of:
 1. the amount of the allowance or grant exclusive of the amount specifically designated for shelter or utilities; **plus**
 2. the maximum amount that the welfare assistance agency could in fact allow the family for shelter and utilities. If the family welfare assistance is reduced from the standard of need by applying a percentage, the amount calculated under this paragraph shall be the amount resulting from one application of the percentage.
- 7) Periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from persons not residing in the dwelling.

- 8) All regular pay, special day and allowances of a member of the Armed Forces (except as provided in number 8 of Income Exclusions).

HUD Part 5 Income Exclusions

- 1) Income from employment of children (including foster children) under the age of 18 years.
- 2) Payments received for the care of foster children or foster adults (usually persons with disabilities unrelated to the tenant family who are unable to live alone).
- 3) Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses (except as provided in number 5 of Income Inclusions).
- 4) Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member.
- 5) Income of a live-in aide (as defined in 24 CFR 5.403).
- 6) Certain increases in income of a disabled member of qualified families residing in HOME-assisted housing or receiving HOME tenant-based rental assistance (24 CFR 5.671(a))
- 7) The full amount of student financial assistance paid directly to the student or to the educational institution.
- 8) The special pay to a family member serving in the Armed Forces who is exposed to hostile fire.
- 9) Self-Sufficiency Program Income.
 - a) Amounts received under training programs funded by HUD.
 - b) Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS).
 - c) Amounts received by a participant in other publicly assisted programs that are specifically for, or in reimbursement of, out-of-pocket expenses incurred (special equipment, clothing, transportation, childcare, etc.) and that are made solely to allow participation in a specific program.
 - d) Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time.
 - e) Incremental earnings and benefits resulting to any family member from participation in qualifying state or local employment training programs (including training not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for the period during which the family member participated in the employment training program.
- 10) Temporary, nonrecurring, or sporadic income (including gifts).
- 11) Reparation payments paid by a foreign government pursuant to claims under the laws of that government by persons who were persecuted during the Nazi era.
- 12) Earnings in excess of \$480 for each full-time student 18 years or older (excluding the head of household or spouse).
- 13) Adoption assistance payments in excess of \$480 per adopted child.

- 14) Deferred periodic amounts from Supplemental Security Income (SSI) and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts.
- 15) Amounts received by the family in the form of refunds or rebates under state or local law for property taxes paid on the dwelling unit.
- 16) Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep this developmentally disabled family member at home.
- 17) Amounts specifically excluded by any other Federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions set forth in 24 CFR 5.609(c) apply. A notice will be published in the Federal Register and distributed to housing owners identifying the benefits that qualify for this exclusion.

Updates will be published and distributed when necessary. The following is a list of income sources that qualify for that exclusion.

- The value of the allotment provided to an eligible household under the Food Stamp Act of 1977;
- Payments to volunteers under the Domestic Volunteer Service Act of 1973 (employment through AmeriCorps, VISTA, Retired Senior Volunteer Program, Foster Grandparents Program, youthful offender incarceration alternatives, senior companions);
- Payments received under the Alaskan Native Claims Settlement Act;
- Income derived from the disposition of funds to the Grant River Band of Ottawa Indians;
- Income derived from certain submarginal land of the United States that is held in trust for certain Indian tribes;
- Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program (LIHEAP);
- Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721);
- The first \$2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the U.S. Claims Court and the interests of individual Indians in trust or restricted lands, including the first \$2,000 per year of income received by individual Indians from funds derived from interests held in such trust or restricted lands;
- Amounts of scholarships funded under Title IV of the Higher Education Act of 1965, including awards under the Federal work-study program or under the Bureau of Indian Affairs student assistance programs;
- Payments received from programs funded under Title V of the Older American's Act of 1985 (Green Thumb, Senior Aides, Older American Community Service Employment Program);
- Payments received on or after January 1, 1989 from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in the In Re Agent Orange product liability litigation, M.D.L. No. 381 (E.D.N.Y.);
- Earned income tax credit refund payments received on or after January 1, 1991, including advanced earned income credit payments;
- The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990;
- Payments received under programs funded in whole or in part under the Job Training Partnership Act (employment and training programs for Native Americans and migrant and seasonal farm workers, Job Corps, veterans employment programs, state job training programs and career intern programs, AmeriCorps);

- Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation;
- Allowances, earnings, and payments to AmeriCorps participants under the National and Community Service Act of 1990;
- Any allowance paid under the provisions of 38 U.S.C. 1805 to a child suffering from spina bifida who is the child of a Vietnam veteran;
- Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act;
- Allowances, earning, and payments to individuals participating in programs under the Workforce Investment Act of 1998.

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