

**2021 Annual Action Plan
For
Idaho's Federal Community Development and
Affordable Housing & Development Programs**



Contents

Executive Summary.....	3
AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)	3
PR-05 Lead & Responsible Agencies - 91.300(b)	5
AP-10 Consultation - 91.110, 91.300(b); 91.315(l).....	6
AP-12 Participation - 91.115, 91.300(c)	12
Expected Resources	13
AP-15 Expected Resources – 91.320(c)(1,2).....	13
Annual Goals and Objectives	22
AP-25 Allocation Priorities – 91.320(d)	30
AP-30 Methods of Distribution – 91.320(d)&(k)	32
AP-35 Projects – (Optional).....	50
AP-38 Project Summary	52
AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)	62
AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)	63
AP-50 Geographic Distribution – 91.320(f)	64
Affordable Housing.....	66
AP-55 Affordable Housing – 24 CFR 91.320(g)	66
AP-60 Public Housing - 24 CFR 91.320(j)	67
AP-65 Homeless and Other Special Needs Activities – 91.320(h)	68
AP-75 Barriers to affordable housing – 91.320(i).....	73
AP-85 Other Actions – 91.320(j)	74
Program Specific Requirements.....	78

Executive Summary

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

1. Introduction

CDBG- See Unique Appendices

2. Summarize the objectives and outcomes identified in the Plan

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

See AP-20 of this plan.

3. Evaluation of past performance

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

Response exceeds maximum allowable characters- See Unique Appendices.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

See Unique Appendices- AP-05 Citizen Participation and Consultation Process

Following the current public participation plan, which includes publishing an English version of the Legal notice twice in Idaho's major newspapers, the first time before the 30-day comment period began, the second time before the public hearing. The legal notice included a statement in Spanish directing the reader to the IHFA and IDC websites, where they could find a copy of the notice in Spanish.

0 Comments Received

5. Summary of public comments

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

The Public Participation Plan for Idaho's HUD-CPD programs is available on the IHFA website at <https://www.idahohousing.com/federal-programs/legal-notices-plans-and-reports/>

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

See attachment titled "Citizen Participation comments".

7. Summary

See attachment titled "Citizen Participation comments".

PR-05 Lead & Responsible Agencies - 91.300(b)

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	IDAHO	
CDBG Administrator	IDAHO	Idaho Department of Commerce
HOPWA Administrator	IDAHO	
HOME Administrator	IDAHO	HOME Programs Department
ESG Administrator	IDAHO	Homelessness Prevention Programs
	IDAHO	HOME Programs Department

Table 1 – Responsible Agencies

Narrative

Idaho Housing and Finance Association is Lead Agency for HUD-CPD reporting.

IHFA is the State of Idaho's designated administrator of HUD-funded housing and housing development programs.

Consolidated Plan Public Contact Information

CDBG Program- Department of Commerce

HOME- Idaho Housing and Finance Association

ESG- Idaho Housing and Finance Association

HTF- Idaho Housing and Finance Association

AP-10 Consultation - 91.110, 91.300(b); 91.315(l)

1. Introduction

N/A

Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies

IHFA hosts a housing coordination round table event four times each year. The event provides a regional forum to discuss current housing issues, promote effective partnerships and enhance ongoing coordination between public and assisted housing providers and local/regional/state service agencies. It brings local, regional, and state housing advocates, public and private service providers, developers, city/county/state/federal officials, state agencies, elected officials/representatives, lenders, and program administrators together to discuss housing, homelessness, and services regionally. Attendees were asked to participate in the Statewide Housing Survey and provide comment regarding this year's Consolidated Plan. In addition IHFA used email distribution lists to request input regarding the consolidated planning process from Idaho's Public Housing Authorities, Section 8/USDA-RD/LIHTC/HOME property owners and developers, residential lenders, real estate brokers, homeless service providers, CHDOs, CDBG entitlement cities, CDBG non-entitlement jurisdictions, Idaho Homelessness Coordinating Committee (IHCC), Idaho Fair Housing Forum, Idaho's disability advocates and centers, Idaho Health & Welfare-Environmental Health, IDHW-TANF & Employment and Training Program. Additionally, IHFA hosts a housing conference every third year with the intent of encouraging these parties to convene together and have impactful and beneficial learning session and discussions on potential strategies used to increase affordable housing opportunities. Increased collaboration between the Balance of State Continuum of Care and the Boise City Ada County Continuum of Care has also emerged. This will encourages greater awareness to the statewide issue of homelessness and for the sharing of best practices and successful models throughout Idaho. The IHCC has and continues to invite state agencies to participate in homelessness resolution discussions and IHCC board planning sessions and activities. This body creates strategic plans designed to meet the challenges in the BoS CoC. Resources targeting and leveraging are also discussed to ensure access priorities mirror HUD's goals for special populations.

The QAP continues to include language that allows a set aside up to 15% of the annual per capita tax credit amount to address special housing need populations including homeless veterans. If IHFA does not utilize this set aside or if qualified applications are not received, the set-aside will be made available to other qualified non-targeted applications. Specific guidelines will be included in the NOFA.

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

The Strategic Planning Committee addresses the needs of the CoC regarding housing types across the Continuum. This committee establishes benchmarks for percentages of new beds both for Permanent Supportive Housing and chronically homeless designations. With regards to HUD's system performance measures, the Committee develops performance benchmarks in regards to HUD's system performance measures, which address the subpopulations of chronically homeless individuals and families, families with children, veterans, unaccompanied youth, and persons at risk of homelessness. Prioritization decisions are made in the Homeless Connect (Coordinated Entry) Committee, and incorporated into the Written Standards. The CoC prioritizes the development of RRH, or conversion of TH to RRH, when applicable. IHFA also has contacts working with foster care programs at the Idaho Department of Health and Welfare, and new relationships with RHY funded providers. These relationships continue to be developed, and more formal participation in the COC began in 2018.

All ESG and COC applicants are asked to address the following questions in each annual application: “are proposed project policies and practices consistent with the laws related to providing education services to homeless individuals and families?”; and “Does the project have a designated staff person to ensure that homeless children are enrolled in school and receive educational services as appropriate?” These questions are scored, and agencies are required to have policies in place at the time of funding. The COC also monitors agencies receiving ESG and COC funds to ensure these policies are in place. Coordination between homeless housing and services providers and school district homeless liaisons occurs frequently, and each educates the other about qualifications and services available. This serves to maximize funding and impact for homeless families with children and unaccompanied youth.

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

The State of Idaho has two Continua of Care: one for Boise City/Ada County, and one for the Balance of State. IHFA, the sole Idaho ESG recipient, serves as the Collaborative Applicant for the Idaho Balance of State CoC. As well as conducting an ESG listening session during the ESG application review process, in order to consult with both of Idaho's CoCs to set ESG priorities, IHFA established the Idaho Homelessness Coordinating Committee (IHCC) as a collaborative body, as well as conducting an ESG listening session during the ESG application review process.

The 6 Regional Coalitions of the Balance of State CoC are comprised of private, nonprofit, government, and homeless service agencies, who provide valuable insight and needs considerations to the CoC planning body. The planning body then provides consolidated feedback to the ESG recipient.

The chair of the Boise City/Ada County CoC sits on the Balance of State's CoC Board as an active member. The Boise City/Ada County CoC therefore has a voice in the IHCC's Written Standards, annual Strategic Planning goals, and performance measurement targets, as well as having access to the Balance of State data reports. In addition to soliciting feedback from the IHCC, IHFA holds a listening session to which all current ESG providers are invited, as well as representatives from the Boise City/Ada County CoC. The intention of the listening session is to gather as much feedback as possible about the needs across the state of Idaho that could be addressed with ESG funding. IHFA also asks for input about the highest priorities for funding in each of Idaho's six regions, as well as across various special needs populations. This session is conducted as a webinar, so that it is easy for distant regions to participate. During the last few rounds of ESG funding decisions, IHFA has decided to allocate 20% of all ESG funds to projects that align with the priorities of the Boise City/Ada County CoC, namely focusing those funds on RRH and Homelessness Prevention.

The CoC's Regional Coalitions, which include private, nonprofit, government, and homeless service agencies, provide valuable insight and needs considerations to the CoC planning body. The planning body then provides consolidated feedback to the ESG recipient. The CoC's Data Collection, Reporting, and Evaluation Committee provides data completeness, destinations, change in income, and length of stay reports, among others to the CoC Board and ESG recipient on a quarterly basis. PIT, AHAR, CAPER, and HIC data are also made available to both parties on an annual basis. The CoC Board provides input into ESG performance measures and has access to reporting documents.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	DEPARTMENT OF COMMERCE
	Agency/Group/Organization Type	Other government - State Other government - County Other government - Local Regional organization Planning organization Business Leaders
	What section of the Plan was addressed by Consultation?	Economic Development non housing community development needs

	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>To better understand Idaho cities and counties non-housing community development needs, the IDC conducted a local government survey. The survey was sent out to 193 cities and 44 counties in June 2019. The survey did have specific questions related to the CDBG program's method of distribution, allocation amounts, and level of need. Of the 237 surveys sent out a total of 123 were received. IDC reviewed the results of the IHFA and Cloudburst housing stakeholder survey that was conduct in January 2019. The survey included questions related to community and economic development. IDC also utilizes and Economic Advisory Council to review IDC and CDBG policies as well as review of CDBG applications. The EAC is comprised of individuals who represent private industry and regularly provide recommendations and advice on public/private partnership and business perspectives.</p>
2	<p>Agency/Group/Organization</p>	<p>IDAHO HOUSING AND FINANCE ASSOCIATION</p>
	<p>Agency/Group/Organization Type</p>	<p>Housing PHA Services - Housing Service-Fair Housing Other government - County Other government - Local Public</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis</p>

<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>IHFA is in ongoing consultation with its service providers, agencies, local and state government, CoCs, property owners and developers. Through this ongoing consultation IHFA maintains updated information on issues and concerns regarding affordable housing, homelessness, and services</p>
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Identify any Agency Types not consulted and provide rationale for not consulting

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care		

Table 3 - Other local / regional / federal planning efforts

Narrative

N/A

AP-12 Participation - 91.115, 91.300(c)

**1. Summary of citizen participation process/Efforts made to broaden citizen participation
Summarize citizen participation process and how it impacted goal-setting**

In preparing and adopting the 2021 Annual Action Plan, the IDC and IHFA follows the current Public Participation Plan for Idaho's Federal Community Development and Affordable Housing Programs.

(1) First public comment period- Legal notices were published in Idaho's major newspapers twice, the first time prior to the 30-day comment period, the second prior to the public hearing. The 30-day comment period is March 1st-March 31st, 2021. The legal notice included a statement in Spanish directing the reader to the IHFA/IDC websites where the full legal notice was available in Spanish. The legal notice included the date, time, and webinar link or location of the public hearing, how submit a comment, how to request a reasonable accommodation and alternative formats, and contacts at IHFA and IDC. The public hearing location was handicap accessible.

 0 comment was received during the comment period.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Hearing	Non-targeted/broad community				

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.320(c)(1,2)

Introduction

Idaho Housing and Finance Association is the Allocating Agency for Idaho's Low-Income Tax Credit program (LIHTC), the designated

administrator for Idaho's HOME Investment Partnership Program, National Housing Trust Fund Program, Neighborhood Stabilization Program, and the Emergency Solutions Grant Program. The Idaho Department of Commerce is the designated Administrator of Idaho's CDBG Program.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	8,008,952	0	0	8,008,952	24,000,000	Over the next year it is expected CDBG funding will be used to construct or improve eligible public facilities, public infrastructure, housing related activities, and economic development activities specific to job creation or downtown improvements. These high priority activities will typically benefit populations including low-to-moderate income, families, rural, special needs, and non-housing community development

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	5,249,159	4,825,837	0	10,074,996	15,000,000	Homeowner rehabilitation and TBRA are not approved programs under IHFA HOME Program

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	1,099,467	0	0	1,099,467	3,298,401	Shelter Operations and services, homelessness prevention and rapid re-housing. Conversion and rehab of transitional housing is not an approved activity under IHFA's ESG Program.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	3,101,884	0	0	3,101,884	9,000,000	
Continuum of Care	public - federal	Admin and Planning Housing Rapid re-housing (rental assistance) Rental Assistance Services Other	3,558,269	0	0	3,558,269	10,674,807	Awarded 2020 Continuum of Care grants.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Tax Credits	private	Multifamily rental new construction Multifamily rental rehab	5,026,120	0	0	5,026,120	15,078,360	Low-Income Housing Tax Credits
Tax Exempt Bond Proceeds	private	Acquisition Economic Development Multifamily rental new construction Multifamily rental rehab	283,000,000	0	0	283,000,000	965,325,000	The benefit to borrowers and projects that are eligible for tax-exempt bond financing is a lower interest rate as interest is earned is exempt from federal and state income taxes.
Other	private	Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Other	999,467	0	0	999,467	2,998,401	ESG Match

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - federal	Admin and Planning Services TBRA Other	1,333,793	0	0	1,333,793	1,333,793	To support those living with HIV/AIDS through STRMU, TBRA, PHP, HIS, Supportive Services, and Admin.
Other	public - federal	Other	15,274,658	0	0	15,274,658	14,651,295	To prevent, prepare for, and respond to the coronavirus by supporting shelter Operations and services, homelessness prevention and rapid re-housing. Conversion and rehab of transitional housing is not an approved activity under IHFA's ESG Program.

Table 5 - Expected Resources – Priority Table

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

The CDBG program does not require match except for administration at the State level, but CDBG does award points to projects based partially on the percentage of match they provide to the project. The local, State, and Federal match categories leverage the CDBG funds by completing the funding package necessary to construct public facilities and infrastructure and housing related projects. The private match leverage is from businesses expanding or building new facilities as a result of the CDBG infrastructure improvements.

With the projected \$37.5 million over 5 year period the Idaho Department of Commerce expects to receive in CDBG funding it is estimated a

total of \$37 million annually from other local, State, Federal, and private sources will be partnered with the CDBG funded project.

HOME program provides the gap financing to eligible and approved owners and developers for rental and homebuyer activities. HOME funds are leveraged to the maximum extent feasible, with private and federal program funds. IHFA incurs a 25% match liability for every HOME entitlement dollar expended on housing activities. IHFA meets its match liability by identifying and banking eligible forms match as defined at HOME CPD Notice 97-03.

Ten percent (10%) of each annual allocation and program income may be used for HOME administrative costs, 5% of each allocation may be awarded to CHDOs as an annual operating assistance grant. The remaining funds are awarded to owners, developers, and homebuyers for eligible HOME-assisted activities.

Housing Trust Fund does not require matching funds. Housing Trust Fund- 90% of each allocation will be used for eligible HTF rental activities. 10 percent of each allocation may be used to help HTF units with operational support and/or operating reserves. Up to 10% of each allocation may be used by IHFA for program and administrative costs.

ESG contribution sources include other non-ESG HUD funds, other federal funds, state government, local government, private funds, and other. ESG imposes a 100% match requirement (minus \$100,000) which may be fulfilled by cash donations or in-kind services. Donations to the ESG encourage and support numerous activities, including homeownership, increasing access to facilities and services, case management, life skills guidance, and counseling, among other support and service efforts.

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

The State of Idaho does not designate publicly owned land or property to address the needs identified in this plan.

Discussion

Annual Goals and Objectives

AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Facilities/Infrastructure-Compliance	2020	2024	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Housing related activities Public Facilities Public Infrastructure	CDBG: \$1,917,171	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 12000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 12 Households Assisted
2	Public Facilities/Infrastructure-Rehabilitation	2020	2024	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Housing related activities Public Facilities Public Infrastructure	CDBG: \$2,300,605	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 17000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 24 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Public Facilities/Infrastructure- New Construction	2020	2024	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development		Public Facilities Public Infrastructure	CDBG: \$1,917,171	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 12000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 12 Households Assisted
4	Economic Development- Job Creation	2020	2024	Non-Housing Community Development		Economic Development	CDBG: \$766,868	Jobs created/retained: 50 Jobs Businesses assisted: 1 Businesses Assisted
5	Economic Development- Downtown Revitalization	2020	2024	Non-Housing Community Development		Cleanup of blighted properties Economic Development	CDBG: \$766,868	Other: 2 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Provide Suitable Living Environment	2020	2024	Homeless		Homeless Shelter Operations & Prevention Housing related activities	ESG: \$1,099,467 Continuum of Care: \$3,123,499 ESG Match: \$1,099,467 ESG-CV: \$15,274,658	Tenant-based rental assistance / Rapid Rehousing: 251 Households Assisted Homeless Person Overnight Shelter: 1354 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 54 Beds Homelessness Prevention: 568 Persons Assisted
7	Provide Decent Affordable Housing	2020	2024	Affordable Housing		Create Decent Affordable Homeownership Create and Preserve Affordable Rental Housing Housing related activities	HOME: \$10,074,996 HTF: \$3,101,884	Rental units constructed: 36 Household Housing Unit Homeowner Housing Added: 12 Household Housing Unit

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Public Facilities/Infrastructure-Compliance
	Goal Description	<p>Activities include bringing public facilities systems (infrastructure, community facilities, public utilities) into compliance with environmental laws, federal and state standards, industry standards, building codes, or best management practices.</p> <p>25%</p> <p>Why 25%?</p> <p>First, for the state CDBG program, the Public Facilities/ Infrastructure- Compliance goal consists of a large diverse number of activities, therefore, by going with 25% it gives local governments a fair amount of flexibility to submit an application based on their Public Facilities/Infrastructure-Compliance needs. The original intent of the CDBG program was meant to not be a top down driven model.</p> <p>Second, over the last year (2020) the CDBG percentage expended on public facilities/infrastructure-compliance was 6%. This did not meet the 2020-2024 Consolidated Plan’s five year goal of expending at least 25% on the public facilities / infrastructure – compliance, however, this is just one year of the five-year plan, so until more data developed will leave percentage at 25%.</p> <p>Further rationale for 25%, is based on the results of the needs survey. Some of the activities identified with the highest needs were parks and recreation facilities, community centers, fire/EMT stations, water and sewer system, see survey results. These activities could fall within the compliance goal. Although streets and sidewalk were identified as high needs it would be difficult for these activities to meet a required low-to-moderate income national objective and subsequently the compliance goal. Supportive infrastructure activities for affordable housing could fall within this goal. Another reason for the 25% is that the needs survey under planning studies indicated a high need for funding for facilities plan. Based on these results Commerce will look to create a separate facilities planning study set-aside, which could fall within the public facilities/infrastructure compliance goal.</p> <p>Third, projects funding from this allocation priority will help to ensure Idaho Department of Commerce meets its 70% of funding to benefit low-to-moderate income requirement.</p>

2	Goal Name	Public Facilities/Infrastructure-Rehabilitation
	Goal Description	<p>Activities include rehabilitation, replacement or remodeling of a public facilities (infrastructure, community facilities, public utilities and affordable housing) systems.</p> <p>30% - Public Facility / Infrastructure – Rehabilitation</p> <p>Why 30%?</p> <p>First, for the state CDBG program, the Public Facilities/Infrastructure- Rehabilitation. Consists of a large diverse number of activities, therefore, by going with 30% it gives local governments a fair amount of flexibility to submit an application based on their Public Facility/Infrastructure- Rehab needs. The original intent of the CDBG program, was not meant to be a top down driven model.</p> <p>Second, over the last year (2020) the CDBG percentage expended on Public Facilities/Infrastructure-Rehab was 39%. This percentage was over the 2020-2024 Consolidated Plan’s five year goal of expending 30% on the Public Facilities /Infrastructure – Rehabilitation. The number of rehabilitation projects was over the 30% so with no major changes to community needs or programmatic changes, there doesn't appear to be a need to change the percentage.</p> <p>Further rationale for 30%, is based on the results of the needs survey. Some of the activities identified with the highest needs were parks and recreation facilities, community centers, fire/EMT stations, water and sewer systems, see survey results. These activities could fall within the rehabilitation goal. Although streets and sidewalks were identified as high needs it would be difficult for these activities to meet a required low-to-moderate income national objective and subsequently the rehabilitation goal. Supportive infrastructure activities for affordable housing could fall within this goal. Another reason for the 30% is that the needs survey under planning studies indicated a high need for funding for facilities plan and a recent state broadband task force has indicated a need to assist in expanding broadband in rural communities, therefore, Commerce will look to create a separate planning / study grant set-aside which would include facilities planning studies and broadband feasibility studies. It is likely the activities under the planning / study grant set-aside could fall within the public facilities / infrastructure rehabilitation goal. This would include helping qualified cities or counties acquire and/or rehabilitate a building to establish an infectious disease treatment clinic and/or accommodate isolation of patients during recovery.</p> <p>Third, projects funding from this allocation priority will help to ensure Idaho Department of Commerce meets its 70% of funding to benefit low-to-moderate income requirement</p>

3	Goal Name	Public Facilities/Infrastructure-New Construction
	Goal Description	<p>Activities include installing new public facilities systems (infrastructure, community facilities, and public utilities) or extending a system to an eligible service area. This includes new infrastructure to support housing related activities and affordable housing.</p> <p>25% - Public Facility / Infrastructure – New Construction</p> <p>Why 25%?</p> <p>First, for the state CDBG program, the Public Facilities/Infrastructure-New Construction goal consists of a large diverse number of activities, therefore, by going with 25% it gives local governments a fair amount of flexibility to submit an application based on their Public Facility/Infrastructure-New Construction needs. The original intent of the CDBG program was not meant to be a top down driven model.</p> <p>Second, over the last year (2020) the CDBG percentage expended on Public Facilities/Infrastructure-New Construction goal was 34%. This percentage was above to the 2020-2024 Consolidated Plan’s five year goal of expending 25% on the Public Facilities /Infrastructure – New Construction. Therefore, since the number of new construction projects was over 25%, and with no major changes to community needs for programmatic changes, there doesn't appear to be a need to change the goal percentage. Further, the state broadband task force has indicated a need to assist in expanding broadband in rural communities, therefore, Commerce will look to create a separate planning / study grant set-aside which would include broadband feasibility studies. It is likely the activities under the planning / study grant set-aside could fall within the public facilities / infrastructure new construction goal.</p> <p>Third, projects funding from this allocation priority will help to ensure Idaho Department of Commerce meets its 70% of funding to benefit low-to-moderate income requirement.</p>

4	Goal Name	Economic Development-Job Creation
	Goal Description	<p>Public infrastructure improvements for business expansion and subsequent job creation for low-to-moderate income persons.</p> <p>10% - Job Creation</p> <p>Why 10%?</p> <p>No question job creation, especially higher paying jobs, is a need in Idaho. However, utilizing CDBG for job creation is not always user friendly for local governments and their partnering business due to environment review timelines, property acquisition standards, and job creation/retention requirements. Therefore, only a limited number of eligible job creation projects that are not in a fast tracking mode nor obligating a large percentage of private funds to the public infrastructure expansion, are an effective and efficient use of CDBG.</p> <p>Second, last year (2020) the CDBG percentage expended on job creation was 0%. Obviously this percentage did not meet the 2020-2024 five year goal of expending 10% on the job creation priority. Based on this, Commerce had considered lowering the percentage, however, one of the best tools to benefit a low-to-moderate income population is to provide job opportunities. Even though using CDBG for job creation projects is not always user friendly, Commerce will keep the goal at 10%.</p> <p>Third, projects funding from this allocation priority will help to ensure IDC meets its 70% of funding to benefit low-to-moderate income requirement.</p>

5	Goal Name	Economic Development-Downtown Revitalization
	Goal Description	<p>Public improvements to downtown blighted areas.</p> <p>10% - Downtown Revitalization</p> <p>Why 10%?</p> <p>Many smaller cities that are served by the CDBG program have seen retail box type businesses establish outside their downtown area which have pulled business and jobs out of their downtown core or have experienced a general lack of sustainable investment in the existing private buildings. In an effort to mitigate these elements and help keep small businesses downtown, some cities are looking to reinvest back into their downtowns. In part because it's a significant part of the community's sense of place, has existing infrastructure, and can also be a draw for tourism. Therefore, a demand exists to improve their downtown infrastructure, which typically includes ADA improvements.</p> <p>Last year the CDBG percentage expended on downtown revitalization was 7% This did not meet the 2020-2024 Consolidated Plan's five year goal of expending 10% on the downtown revitalization priority. Whereas, the goal was almost met, and the need remains high, Commerce will keep the goal at 10%. One of the reasons for not increasing the goal is that downtown projects do not contribute to the requirement of spending 70% of funding to benefit low-to-moderate income.</p> <p>Third, Idaho Department of Commerce's local government needs survey indicated the existing downtown revitalization goal as the 2nd highest need priority.</p>
6	Goal Name	Provide Suitable Living Environment
	Goal Description	<p>The ESG program will serve 2,227 households with shelter, homeless prevention and rapid re-housing funds.</p> <p>ESG-CV funds will be utilized to the prepare, prevent, and respond to COVID-19 infections by providing funding for Shelter Services and Operations, Homelessness Prevention, Rapid Rehousing, HMIS/Comparable Database, and Admin.</p>
7	Goal Name	Provide Decent Affordable Housing
	Goal Description	<p>The HOME program will award funds to approved eligible affordable rental housing and homebuyer activities during the 2020 Program Year. IHFA anticipates all activities approved in the program year 2021 should be completed by the end of Program year 2025.</p>

AP-25 Allocation Priorities – 91.320(d)

Introduction:

Exceeds Maximum characters- See Unique Appendices

Funding Allocation Priorities

	Public Facilities/Infrastructure- Compliance (%)	Public Facilities/Infrastructure- Rehabilitation (%)	Public Facilities/Infrastructure- New Construction (%)	Economic Development- Job Creation (%)	Economic Development- Downtown Revitalization (%)	Provide Suitable Living Environment (%)	Provide Decent Affordable Housing (%)	Total (%)
CDBG	25	30	25	10	10	0	0	100
HOME	0	0	0	0	0	0	100	100
ESG	0	0	0	0	0	100	0	100
HTF	0	0	0	0	0	0	100	100
Continuum of Care	0	0	0	0	0	100	0	100
Tax Credits	0	0	0	0	0	0	100	100
Tax Exempt Bond Proceeds	0	0	0	0	0	0	0	0
Other CDBG-CV- CARES	0	0	0	0	0	0	0	0
Other ESG Match	0	0	0	0	0	0	0	0
Other ESG- CV	0	0	0	0	0	100	0	100

Other HOPWA Competitive Grant	0	0	0	0	0	100	0	100
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Table 7 – Funding Allocation Priorities

Reason for Allocation Priorities

CDBG - See AP 20 Goals 1,2,3,4 and 5 descriptions

HOME & HTF- The 2019 Idaho Housing Needs Survey, and the 2019 Idaho County-level Housing and Demographic Data, as well as input from the public indicate the creation and preservation of affordable permanent rental housing for extremely low-income, elderly, and disabled persons and families is Idaho's highest priority housing needs. This is followed closely by affordable homebuyer housing.

ESG- Other than funding from faith-based organizations and Federal programs, Idaho’s homeless housing and service programs receive very little financial support. In the absence of much-needed emergency shelter funding, many individuals and families are unable to receive temporary assistance and reprieve from homelessness, and access to services to assist in being rapidly re-housed. For this reason, Idaho has directed the maximum amount of ESG funds allowed by HUD regulations (60%) towards emergency shelter activities. The remaining forty percent (40%) is used for homelessness prevention and rapid re-housing activities, with an emphasis placed on rapid re-housing. The additional emphasis is imposed due to IHFA’s alignment with HUD objectives, and HUD precedence within the Homelessness Prevention and Rapid Re-Housing Program program, which was born out of the American Recovery and Reinvestment Act of 2009, to divert individuals out of homelessness and shorten shelter stays. Further descriptions are included in section AP-20. 20% of all ESG funds are allocated to the priorities identified and set forth by the Boise City/Ada County CoC. ESG-CV funds follow similar allocation priorities with the additional assumption of using those funds to prepare, prevent, and respond to COVID-19 infections by providing funding for Shelter Services and Operations, Homelessness Prevention, Rapid Rehousing, outreach, HMIS/Comparable Database, and Admin.

How will the proposed distribution of funds will address the priority needs and specific objectives described in the Consolidated Plan?

CDBG - See AP 20 Goals 1,2,3,4 and 5 descriptions

AP-30 Methods of Distribution – 91.320(d)&(k)

Introduction:

- Idaho Department of Commerce- State of Idaho's CDBG Program
- Idaho Housing and Finance- State of Idaho's HOME Program
- Idaho Housing and Finance- State of Idaho's Emergency Solutions Grant Program
- Idaho Housing and Finance- State of Idaho's National Housing Trust Fund Program:

The HTF regulations require IHFA to describe how the HTF per unit subsidy limits were determined. IHFA chose to use the HOME Maximum Per-Unit Subsidy Limits as the appropriate limits for the HTF Program- Idaho's HOME Maximum Per-unit Subsidy Limits are established by Region X HUD-CPD Office, are currently 240% of the base limit for the Section 234 Program (Condominium housing basic housing limits for elevator-type projects). Prior to receiving the first HTF allocation, IHFA reviewed the amount of HOME funds invested on a per-unit basis throughout Idaho over the three previous program years (2013-2015). HOME funds were invested in affordable housing throughout Idaho, including high cost and resort areas. In most cases, the HOME per-unit maximum subsidy limits were more than sufficient to meet the gap financing needs of the project. Accordingly, IHFA has determined the HOME Per-Unit Maximum Subsidy limits are the appropriate per-unit subsidy limit for the Housing Trust Fund Program.

Distribution Methods

Table 8 - Distribution Methods by State Program

1	State Program Name:	HOME Homebuyer Properties Activities
	Funding Sources:	HOME

<p>Describe the state program addressed by the Method of Distribution.</p>	<p>Funding proposal are submitted by a qualified units of local government and/or non-profit organizations following a published Request for Proposal (RFP). Eligible activities under this program include the acquisition and rehabilitation of substandard condition single-family units and the new construction of single-family units to be sold to a qualified HOME-eligible, IHFA-qualified, low-income homebuyer, when completed. The sales price to the low-income homebuyer cannot exceed the HOME Homeownership value limits for the area in which the unit is located.</p> <p>The homebuyer must reside in the HOME-assisted unit as a principal residence, as defined in the HOME Administrative Plan, during the HOME period of affordability or repay the HOME loan in full. The HOME period of affordability is determined by the amount of direct assistance the homebuyer receives. The homebuyer is able to sell the HOME-assisted unit at any time, to any willing buyer, for whatever price the market will bear. At transfer of title, IHFA will attempt to recapture the full amount of the HOME loan from the net proceeds of the sale as defined under the HOME Program's Recapture Option or the HOME Program's Resale option, depending on the type of activity. The maximum amount of subsidy available to a homebuyer will be determined on an annual basis and published in the annual HOME Administrative Plan.</p> <p>An eligible homebuyer(s) must document household income 80% AMI as defined by 24 CFR 5.609 (Annual Income), have US citizenship or other eligibility status, have limited liquid assets as defined in the HOME Administrative Plan.</p> <p>The single-family unit must be an eligible property type. If the unit was constructed prior to January 1, 1978, the rehab activity must comply with EPA and HUD Lead-Based paint disclosures, inspections, assessments, and lead hazard reduction requirements.</p> <p>The initial acquisition and the final sale to the homebuyer, the transaction must document the purchase offer agreement complies with HUD-ER requirements, Uniform Relocation Act and Voluntary Sales Disclosure, as well as other applicable federal and state cross-cutting regulations.</p>
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	<p>HOME Match is only considered eligible under this activity, if the amount of the match contribution reduces the sales price to the homebuyer or enables the house to be sold for less than the development costs by an amount equal to the match contribution.</p> <p>See Unique Appendices</p>
<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Following a published Request for Proposals, nonprofit developers submit will submit a funding proposal(s). IHFA posts the proposal requirements, which are updated annually, on the IHFA website. Proposals must meet the submission requirements, which include the following criteria:</p> <ul style="list-style-type: none"> • The most important criteria is the nonprofits evidence of organizational and development capacity to undertake the type, size, and scope of the proposed activity, IRS tax exempt status, evidence of good standing with the State of Idaho and IHFA, and a market analyses that indicates a need for the type and scope of the proposed activity. Does the owner-developer have current activities underway? If so, are they meeting developmental milestones as proposed, and is the project under, on, or over budget. • The activity(s): Does the proposed activity meet IHFA annual housing and funding goals for the program year, i.e. new construction vs rehabilitation, number of proposed units, other funding sources, and total funds requested. Second, are the costs necessary and reasonable compared to other similar projects. And finally, will the estimated market value of the property(s) when completed, be greater than or less than the amount of funds expended to develop the unit(s).
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>N/A</p>

<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>N/A</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	
<p>Describe how resources will be allocated among funding categories.</p>	<p>N/A</p>

	Describe threshold factors and grant size limits.	HOME funds are awarded as a 0% interest, due-on-sale, loan. The maximum amount of funds available on a per-unit basis, will not exceed the HOME Maximum Per-Unit Subsidy Limits in effect at the time the funds are committed to the project. Threshold factors are described in detail at "Describe all of the criteria that will be used to select applications and the relative importance of these criteria" in AP-30, above.
	What are the outcome measures expected as a result of the method of distribution?	It is estimated that 12 Homebuyer properties (single-family units) will be constructed for rehabilitated then sold to qualified low-income homebuyers.
2	State Program Name:	Rental Housing Production
	Funding Sources:	HOME HTF

<p>Describe the state program addressed by the Method of Distribution.</p>	<p>Following a published NOFA, private and non-profit developers can apply for funds for eligible rental housing activities. The application must include certain minimum threshold criteria and other project-specific criteria as identified in the Annual Administrative Plan. Eligible recipients must be registered Business Entities with the State of Idaho and in Good Standing with IHFA (defined as demonstrated experience and capacity to own, develop, manage, and market federally-assisted rental housing, are familiar with the requirements of other Federal housing programs that may be used in conjunction with CPD funds to ensure compliance with applicable requirements and regulations). Demonstrated experience includes evidence of completing previous projects on time and within the approved budget, and no outstanding or material findings of non-compliance during the period of affordability.</p> <p>IHFA awards HOME/HTF funds as a low or no interest loan (HOME) or grant (HTF only), depending on the type of project, other programs involved in the project, and the type of preference tenant population(s) served. HOME and/or HTF funds are not committed to any activity until it has received the appropriate level of environmental clearance and all sources of financing in the project have been reasonably secured. IHFA's HOME and HTF programs are designed to work with a variety of public and private funding sources and programs to help create and preserve affordable housing. Single-family rental activities must be owned by a non-profit or unit of local government at application and during the period of affordability. HOME and HTF developers partner with the Low-Income Housing Tax Credit program to create affordable multifamily rental housing units. The HOME and HTF programs are designed to work well with a variety of public and private funding sources to help create and preserve affordable housing. IHFA is the Allocating Agency for Idaho's Low-Income Housing Tax Credit Program.</p>
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<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>ional criteria includes type, scope, and description of the activity, per-unit total and assistance level of investment, proposed project replacement reserves, other funding sources, debt service coverage ratio, proposed loan repayment structure, ownership structure, federal cross-cutting requirements, local planning and zoning approval, proposed tenant population(s), match contributions, development timeline, developer capacity, proximity to essential services based on the proposed tenant population, green building energy efficiency design components, site and building unit design and amenities. HTF applications/proposals in addition to the HOME specific threshold criteria, an HTF funded project would not normally receive the points available under the Loan repayment scoring category. Therefore, when the application includes HTF funding, the application/proposal could receive additional points if the project meets the following HTF specific criteria: Geographic Diversity, Applicant Capacity, Project-based Rental Assistance, Affordability Period Duration, Leverage from Non-Federal Sources, Priority Housing Needs.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>N/A</p>

<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>N/A</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	
<p>Describe how resources will be allocated among funding categories.</p>	<p>HOME applications/proposals must include specific threshold criteria (see threshold criteria below) to receive a full review and scoring. AdditIHFA awards HOME and HTF funds to eligible owner/developers following a published NOFA/RFP application/proposal review process. The multifamily rental projects are funded once each year, which coincides with IHFA's Low-income Housing Tax Credit program. Single-family rental housing proposals are accepted following a published RFP, usually after multifamily rental project funding is known.</p> <p>90% of Idaho's HTF funds will be used for rental housing production and preservation. The funds will target extremely low-income (30% AMI) households.</p>

	<p>Describe threshold factors and grant size limits.</p>	<p>Threshold factors for rental housing activities are identified in the Annual HOME, HTF and NSP Administrative Plan. This plan is reviewed and revised each year as determined by IHFA. The HOME maximum subsidy limit is the 221(d)(3) limits.</p> <p>See Unique Appendices</p>
	<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>36 HOME and HTF-assisted rental units serving Low, Very low, and Extremely low-income families and individuals. Projects with a tenant preference for elderly, disabled or 30% AMI received additional points during the application scoring process. The points are reviewed annually and included in the Annual Administrative Plan.</p>
<p>3</p>	<p>State Program Name:</p>	<p>State of Idaho CDBG</p>
	<p>Funding Sources:</p>	<p>CDBG</p>
	<p>Describe the state program addressed by the Method of Distribution.</p>	<p>See Unique Appendices.</p>

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>See Unique Appendices.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>See Unique Appendices.</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>N/A</p>

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	
<p>Describe how resources will be allocated among funding categories.</p>	<p>See Unique Appendices.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>See Unique Appendices.</p>

	What are the outcome measures expected as a result of the method of distribution?	See Unique Appendices.
4	State Program Name:	State of Idaho ESG
	Funding Sources:	ESG CDBG-CV-CARES

<p>Describe the state program addressed by the Method of Distribution.</p>	<p>IHFA’s ESG and ESG-CV subrecipients are chosen through a competitive statewide application process. This process includes the following elements:</p> <ul style="list-style-type: none"> • Funding availability announced in Idaho newspapers in each region of the state soliciting project applications from interested state or local governments and non-profit organizations. • In 2020, 26 applications were submitted for review by the Independent Review Panel (IRP). Persons with experience in issues related to homelessness were recruited to serve on the IRP. The reviewers are responsible for rating applications using criteria provided by IHFA. • Members of the IRP score each proposal individually before meeting to reconcile and average all panelists’ scores. The resulting averaged score reflects the Panel’s collective determination of merit. All applications meeting a threshold score determined by a weighted average were funded. <p>When special/additional funding is made available to the ESG program, the Recipient will allocate those funds through an internal process to expedite the award. Factors affecting this distribution may include timing of the award, timeliness of expenditures, performance, need, and HUD or CoC priorities.</p> <p>ESG-CV funds will be utilized to the prepare, prevent, and respond to COVID-19 infections by providing funding for Shelter Services and Operations, Outreach, Homelessness Prevention, Rapid Rehousing, HMIS/Comparable Database, and Admin.</p>
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<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>In order to secure ESG and ESG-CV funding, applicants must satisfy several threshold requirements, including sufficient match commitment, participation in Coordinated Entry, participation in HMIS or a comparable database, compliance with Federal Education requirements (under 42 USC 11431 et seq.), and current registration with SAM and the Idaho Secretary of State. They must also confirm that they are not a federally debarred contractor, that they are a 501(c)(3), and that they have no outstanding federal debt, and participate under Housing First principals.</p> <p>If they meet all the above criteria, their applications are reviewed by an Independent Review Panel of community members, who use a predetermined set of scoring criteria to evaluate each question. The decision-making process for funding is based on the following criteria, listed in order of importance:</p> <ol style="list-style-type: none"> 1. The Independent Review Panel score of the application 2. The agency’s background, including history of service and population served; this also includes the agency’s proven ability to administer grant funds 3. Emergency Solutions needs and/or the service gaps the project would address (Geographical and special population needs are both considered) 4. Stated goals and objectives and how they would be achieved 5. Outcome measurements and documentation of past accomplishments
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	

<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>IHFA’s ESG and ESG-CV subrecipients are chosen through a competitive statewide application process. This process includes the following elements:</p> <ul style="list-style-type: none"> • Funding availability is announced in Idaho newspapers in each region of the state, soliciting project applications from interested state or local governments and nonprofit organizations. • In 2020, 26 project applications were submitted for review to an Independent Review Panel (IRP) for ESG funds, 22 project applications were submitted for review by ESG-CV applicants. Individuals with nonprofit grant evaluation experience were recruited to serve on the IRP. The reviewers are responsible for rating applications using criteria provided by IHFA. • Members of the IRP score each regular ESG proposal individually (ESG-CV applications are not scored by an IRP) before meeting to reconcile and average all panelists’ scores. The resulting averaged score reflects the Panel’s collective determination of merit. All applications meeting a threshold score determined by a weighted average were funded. The following areas serve as the basis for funding approval: <ol style="list-style-type: none"> 1. The Independent Review Panel score of the application 2. The agency’s background, including history of service and population served; this also includes the agency’s proven ability to administer grant funds 3. Emergency Solutions needs and/or the service gaps the project would address (Geographical and special population needs are both considered) 4. Stated goals and objectives and how they would be achieved 5. Outcome measurements and documentation of past accomplishments • From the rating process, in 2020, 16 projects were awarded conditional funding to provide shelter services and operations, and 9 projects were awarded homelessness prevention or rapid re-housing activities in their respective regions of the state.
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	<p>When special/additional funding is made available to the ESG program, the Recipient will allocate those funds through an internal process to expedite award. Factors affecting this distribution may include timing of the award, timeliness of expenditures, performance, need, and HUD or CoC priorities. ESG-CV funds are utilized to the prepare, prevent, and respond to COVID-19 infections by providing funding for Shelter Services and Operations, Outreach, Homelessness Prevention, Rapid Rehousing, HMIS/Comparable Database, and Admin. Due to the on-going need to prioritize ESG-CV funds in a timely manner, no IRP is utilized in the evaluation of applications and funding decisions are made solely by IHFA, IHCC, and the Boise City/Ada County CoC.</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	
<p>Describe how resources will be allocated among funding categories.</p>	<p>Shelter activities will be comprised of no more than sixty percent (60%) of the total ESG award. Of the remaining forty percent (40%), homelessness prevention will exceed no more than forty percent (40%), with rapid re-housing funds equaling approximately sixty percent (60%).</p> <p>Additional funding allocations will be allocated based on HUD-identified priorities or CoC-identified targets.</p> <p>ESG-CV funds are utilized to prepare, prevent, and respond to COVID-19 infections by providing funding for Shelter Services and Operations, Outreach, Homelessness Prevention, Rapid Rehousing, HMIS/Comparable Database, and Admin.</p>

<p>Describe threshold factors and grant size limits.</p>	<p>Subrecipients must document their experience with the proposed population, organizational capacity, and demonstrated fiscal ability to administer federal funding. The ESG and ESG-CV programs do not set grant size limits, but bases allocation on requests provided by applicant agencies, which include a descriptive budget narrative documenting need.</p>
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<ul style="list-style-type: none"> • Reduce Number of Those Living On Streets or In Shelters or First Time Homeless: Sixty-five percent (65%) of households receiving homelessness prevention will not enter a HUD-funded shelter or rapid re-housing program or access homelessness prevention funding again within twelve (12) months of receiving assistance. Achievement of the applicable goal will be verified using HMIS data or a comparable database. (HP) • Shorten Length of Homelessness and Risk of Housing Instability: Fifty percent (50%) of participants living in shelter will exit to permanent housing. Achievement of this goal will be verified using HMIS data or a comparable database. (ES) • Reduce Housing Barriers or Risk of Housing Stability: Sixty percent (60%) of participants will exit the program receiving at least one mainstream resource. Achievement of this goal will be verified using HMIS data or a comparable database. (ES, RRH) Ten percent (10%) of households will gain or increase employment or other income at the time of project exit. Achievement of this goal will be verified using HMIS data or a comparable database. (RRH) • Maintain Data Quality: Programs will maintain 95% data completeness of the Universal Data Elements in HMIS or a comparable database. Achievement of this goal will be verified using HMIS data or a comparable database. (ES, RRH, HP)

Discussion:

No response required.

AP-35 Projects – (Optional)

Introduction:

State of Idaho's 2021 CDBG, HOME, HTF, and ESG projects.

#	Project Name
1	CDBG-Public Facilities/Infrastructure-Compliance
2	CDBG-Public Facilities/Infrastructure-Rehabilitation
3	CDBG-Public Facilities/Infrastructure-New Construction
4	CDBG-Economic Development-Job Creation
5	CDBG-Economic Development-Downtown Revitalization
6	CDBG State Administration
7	CDBG-Technical Assistance
8	CDBG Planning Grants
9	State of Idaho ESG
10	2021 HOME Administration
11	2021 Multifamily Rental - New Construction
12	2021 Single Family - Rental
13	2021 Single Family Homebuyer - New Construction
14	2021 Single Family Homebuyer - Rehabilitation
15	2021 CHDO Predevelopment Loan
16	2021 HTF Administration
17	2021 CHDO Operating Assistance Grant

Table 9 – Project Information

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

CDBG – Allocation priorities were established based on local government services and activities that serve the public that are under constant challenge to meet demand and regulatory requirements; and have consistently been the highest demand for CDBG funding. The priorities were also established on what realistically could be effectively managed and ensuring the CDBG funds benefit at least 70% low-to-moderate income persons. The obstacles to addressing the needs include: decreasing funding, increasing activity cost, the size and the rural nature of a high number of communities, and the local government’s ability to communicate and implement some of the complex requirements with limited staff and resources. The state has set-up the CDBG program to assist the elderly and frail elderly special needs population by continuing to keep in-place the senior center set-aside. Having this set-aside allows for senior center facilities to compete for CDBG funding within a limited number of applications, thereby, improving opportunities to receive funding. Senior centers are more than a socializing location but also prepare and cook for meals on-site and the delivery of meals to seniors who are unable to

commute or are home bound.

The State will also continue to ensure that applicants are aware that the removal of architectural barriers in existing public buildings and certain ADA improvements are eligible for CDBG funding. Activities such as accessible bathrooms and ADA compliant sidewalks benefit all individuals including the physically disabled.

HOME and HTF- To help address Idaho's affordable housing needs, IHFA allocates funds to permanent rental and homebuyer housing activities to address the following underserved housing needs: (1) Create and preserve affordable rental housing (HOME and HTF); (2) Provide 0% interest loans to nonprofit developers and units of local government to acquire and construct or rehabilitate single-family units to be sold or rented to qualified low-income homebuyers (HOME and/or HTF); (3) Provide operating assistance grants to certified non-profit, community-based housing development organizations (CHDOs) to help with their day-to-day operations as they build organizational capacity to own/develop affordable rental housing and homebuyer properties in Idaho (HOME only).

ESG-Service access is limited in rural Idaho. Funding constraints, available transportation, as well as the limited number of agencies with homeless-related missions, add to this issue. For this reason, ESG, ESG-CV, COC, and HOPWA projects are allowed to evaluate client need and service delivery, and use their own assessments to determine program needs, while ensuring compliance with program regulations. This open flexibility encourages projects to meet the needs to the population in each region.

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG-Public Facilities/Infrastructure-Compliance
	Target Area	
	Goals Supported	Public Facilities/Infrastructure-Compliance
	Needs Addressed	Public Facilities Public Infrastructure Housing related activities
	Funding	CDBG: \$1,917,171
	Description	Activities that bring public facility systems (infrastructure, community facilities, public utilities) into compliance with environmental laws, federal and state standards, industry standards, building codes and best management practices.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	State of Idaho estimates 579 persons will benefit from the proposed activities. Based on the state's census data there are 2.66 persons per household. 217 households will benefit from the proposed activities.
	Location Description	cities and counties throughout Idaho with the exception of nine entitlement: Coeur D Alene, Lewiston, Caldwell, Nampa, Meridian, Boise, Pocatello, Idaho Falls and Twin Falls.
	Planned Activities	Project administration costs, design services, land acquisition, public facilities/infrastructure new construction, rehabilitation and compliance.
2	Project Name	CDBG-Public Facilities/Infrastructure-Rehabilitation
	Target Area	
	Goals Supported	Public Facilities/Infrastructure-Rehabilitation
	Needs Addressed	Public Facilities Public Infrastructure Housing related activities
	Funding	CDBG: \$2,300,605

	Description	Activities that include the rehabilitation, replacement, and/or remodeling of public facilities (infrastructure, community facilities, public utilities, and affordable housing) systems.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	State of Idaho estimates 9349 persons will benefit from the proposed activities. Based on the state's census data there are 2.66 person per household. 3515 households will benefit from the proposed activities.
	Location Description	Cities and counties throughout Idaho with the exception of nine entitlement cities: Coeur D Alene, Lewiston, Caldwell, Nampa, Meridian, Boise, Pocatello, Idaho Falls and Twin Falls.
	Planned Activities	Activities that include the rehabilitation, replacement, and/or remodeling of public facilities (infrastructure, community facilities, public utilities and affordable housing) systems.
3	Project Name	CDBG-Public Facilities/Infrastructure-New Construction
	Target Area	
	Goals Supported	Public Facilities/Infrastructure-New Construction
	Needs Addressed	Public Facilities Public Infrastructure Housing related activities
	Funding	CDBG: \$1,917,171
	Description	New construction of a public facility (infrastructure, community facilities and public utilities) or extension of public facilities to an eligible service area. This includes new infrastructure to support affordable housing and housing related activities.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	State of Idaho estimates 13743 persons will benefit from the proposed activities. Based on the state's census data there are 2.66 persons per household. 5167 households will benefit from the proposed activities.
	Location Description	Cities and counties throughout Idaho with the exception of nine entitlement cities: Coeur D Alene, Lewiston, Caldwell, Nampa, Meridian, Boise, Pocatello, Idaho Falls and Twin Falls.

	Planned Activities	Project administration costs, design services, land acquisition, public facilities/infrastructure new construction, rehabilitation and compliance.
4	Project Name	CDBG-Economic Development-Job Creation
	Target Area	
	Goals Supported	Economic Development-Job Creation
	Needs Addressed	Economic Development
	Funding	CDBG: \$766,868
	Description	Infrastructure improvements for business expansion and subsequent job creation.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Cities and counties throughout Idaho with the exception of nine entitlement cities: Coeur D Alene, Lewiston, Caldwell, Nampa, Meridian, Boise, Pocatello, Idaho Falls and Twin Falls.
Planned Activities	Project administration costs, design services, land acquisition, public facilities/infrastructure new construction, rehabilitation and compliance.	
5	Project Name	CDBG-Economic Development-Downtown Revitalization
	Target Area	
	Goals Supported	Economic Development-Downtown Revitalization
	Needs Addressed	Economic Development Cleanup of blighted properties
	Funding	CDBG: \$766,868
	Description	Public infrastructure improvements to prevent blighted downtown areas.
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	State of Idaho estimates one low to moderate income city will benefit from downtown revitalization project.
	Location Description	Cities and counties throughout Idaho with the exception of nine entitlement cities: Coeur D Alene, Lewiston, Caldwell, Nampa, Meridian, Boise, Pocatello, Idaho Falls and Twin Falls.
	Planned Activities	Project administration costs, design services, land acquisition, public facilities/infrastructure new construction, rehabilitation and compliance.
6	Project Name	CDBG State Administration
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$260,179
	Description	State administration costs associated with projects and activities.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	State administrative costs.
7	Project Name	CDBG-Technical Assistance
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$80,090
	Description	Fair Housing activities, training, and technical assistance.
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Fair Housing activities, training events, technical assistance.
8	Project Name	CDBG Planning Grants
	Target Area	
	Goals Supported	
	Needs Addressed	Planning Studies
	Funding	:
	Description	Funds Allocated to assist Grantees with public infrastructure planning. FPS
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Planning grants for Grantees such as Facility Plan Studies.
9	Project Name	State of Idaho ESG
	Target Area	
	Goals Supported	Provide Suitable Living Environment Provide Decent Affordable Housing
	Needs Addressed	Housing related activities Homeless Shelter Operations & Prevention
	Funding	ESG Match: \$1,099,467 ESG-CV: \$15,274,658

	Description	Includes shelter, homelessness prevention, rapid re-housing, data collection and administrative activities. The Special Needs Housing Programs administered by IHFA predominately serve homeless persons. In many cases, these HUD funds can be used for homelessness prevention and rapid rehousing activities. ESG-CV funds are utilized to prepare, prevent, and respond to COVID-19 infections by providing funding for Shelter Services and Operations, Outreach, Homelessness Prevention, Rapid Rehousing, HMIS/Comparable Database, and Admin.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	Through ESG and ESG-CV we expect to help at least 75 households with rapid rehousing, at least 50 households with homelessness prevention, and to support at least 625 individuals with shelter services. Our shelters include family shelters, domestic violence shelters, and one youth shelter.
	Location Description	We provide ESG and ESG-CV funds throughout the state of Idaho, including the cities of Boise, Pocatello, Moscow, Nampa, Coeur d'Alene, Salmon, Malad, Lewiston, Twin Falls, and Idaho Falls.
	Planned Activities	With ESG funding we will provide funding for shelter services and operations, homelessness prevention, rapid rehousing, data collection, and administration. ESG-CV funds will be utilized to prepare, prevent, and respond to COVID-19 infections by providing funding for Shelter Services and Operations, Outreach, Homelessness Prevention, Rapid Rehousing, HMIS/Comparable Database, and Admin.
10	Project Name	2021 HOME Administration
	Target Area	
	Goals Supported	Provide Decent Affordable Housing
	Needs Addressed	
	Funding	HOME: \$1,007,499
	Description	Administration and planning costs
	Target Date	3/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A

	Planned Activities	Administration and Planning costs.
11	Project Name	2021 Multifamily Rental - New Construction
	Target Area	
	Goals Supported	Provide Decent Affordable Housing
	Needs Addressed	Create and Preserve Affordable Rental Housing
	Funding	HOME: \$5,265,000 HTF: \$1,900,000
	Description	Provide Decent Affordable Housing
	Target Date	3/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	40 units of HOME and/or HTF funded rental housing units targeting low, very low, and/or extremely low-income households.
	Location Description	Idaho
	Planned Activities	
12	Project Name	2021 Single Family - Rental
	Target Area	
	Goals Supported	Provide Decent Affordable Housing
	Needs Addressed	Create and Preserve Affordable Rental Housing
	Funding	HTF: \$891,696
	Description	Nonprofit owner-developers will construct or rehab single-family homebuyer units for sale to low-income or extremely-low income households.
	Target Date	3/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	Six (6) Units Very-low income households.
	Location Description	Idaho
	Planned Activities	
	Project Name	2021 Single Family Homebuyer - New Construction

13	Target Area	
	Goals Supported	Provide Decent Affordable Housing
	Needs Addressed	Create Decent Affordable Homeownership
	Funding	HOME: \$3,500,038
	Description	Non-profit owner-developers will acquire land, construct single-family units to be sold to HOME eligible, IHFA qualified homebuyers.
	Target Date	3/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	Fifteen (15) Low-income Households
	Location Description	Idaho
	Planned Activities	
14	Project Name	2021 Single Family Homebuyer - Rehabilitation
	Target Area	
	Goals Supported	Provide Decent Affordable Housing
	Needs Addressed	Create Decent Affordable Homeownership
	Funding	:
	Description	
	Target Date	3/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	Zero (0) Low-income Households
	Location Description	Idaho
Planned Activities		
15	Project Name	2021 CHDO Predevelopment Loan
	Target Area	
	Goals Supported	Provide Decent Affordable Housing
	Needs Addressed	

	Funding	HOME: \$40,000
	Description	Upfront predevelopment costs for a potential CHDO Set-Aside Project
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	One CHDO Predevelopment loan to assist with feasibility and planning activities of a potential activity
16	Project Name	2021 HTF Administration
	Target Area	
	Goals Supported	Provide Decent Affordable Housing
	Needs Addressed	
	Funding	HTF: \$310,188
	Description	Administration of Program
	Target Date	3/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Idaho
	Planned Activities	
17	Project Name	2021 CHDO Operating Assistance Grant
	Target Area	
	Goals Supported	Provide Decent Affordable Housing
	Needs Addressed	
	Funding	HOME: \$262,457
	Description	Assistance to certified CHDOs to help with the day-to-day operating expenses as they develop affordable housing in the communities they serve.

	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Idaho
	Planned Activities	Assist certified and eligible CHDOs with up to \$50,000 during PY 2021 to help pay for day-to-day operating expenses.

AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)

Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?

No

Available Grant Amounts

N/A

Acceptance process of applications

N/A

AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)

Will the state allow units of general local government to carry out community revitalization strategies?

Yes

State’s Process and Criteria for approving local government revitalization strategies

State’s process and criteria for approving local government revitalization strategies (urban renewal) is outlined in Statute - Title 50 Municipal Corporations, Chapter 20 Urban Renewal Law.

AP-50 Geographic Distribution – 91.320(f)

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

CDBG- Funds are allocated on a competitive basis: annually for public facilities, downtown revitalization, and senior and community center and park projects; quarterly for job creation projects; and throughout the year for imminent threat projects. Funding per the seven regions varies year to year depending on the greatest needs and project readiness. Idaho generally spends on average over 75% of the CDBG funds on activities that benefit low-to-moderate income persons.

HOME and HTF- See Unique Appendices

ESG and ESG-CV - For purposes of CPD program fund allocation, program administration, and BOS COC structuring, Idaho is divided into seven (7) regions. See Unique Appendices for a map of the 7 regions, and the counties that are included in each region. ESG funds are distributed across the seven regions through a competitive application process, or in the case of additional funding, through a modified allocation method, as described in AP-30. Final awards are based on application score for shelter funds and a formula which determines need based on five factors when determining homelessness prevention and rapid re-housing allocations, or in the case of additional funding, via methods described in AP-30. ESG-CV funds are utilized to the prepare, prevent, and respond to COVID-19 infections by providing funding for Shelter Services and Operations, Homelessness Prevention, Rapid Rehousing, HMIS/Comparable Database, and Admin.

Geographic Distribution

Target Area	Percentage of Funds

Table 10 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

ESG and ESG-CV distribution of shelter, homelessness prevention, and rapid re-housing funds are based on the competitive application process. Homelessness prevention and rapid rehousing considers application scores as well as the outcome of a formula-based allocation using multiple factors, including application score, population, unemployment rate, Point-In-Time count results, and bed utilization. There are two common geographic influences: 1) population concentrations, and 2) the service delivery dynamics in rural Idaho. The absence of one or more agencies able, willing, or in existence to be to apply for funds can cause a lack of funding in certain regions.

When additional funding is made available to the ESG program, modified allocation priorities will be identified using factors such as timing of the award, timeliness of expenditures, performance, needs, and HUD or COC priorities. ESG-CV funds are utilized to the prepare, prevent, and respond to COVID-19

infections by providing funding for Shelter Services and Operations, Homelessness Prevention, Rapid Rehousing, HMIS/Comparable Database, and Admin on an needed basis throughout the state. 20% of both ESG and ESG-CV funding are allocated to the priorities identified by the Boise City/Ada County CoC.

Discussion

No response

Affordable Housing

AP-55 Affordable Housing – 24 CFR 91.320(g)

Introduction:

The numbers below reflect the one year goals for the provision of affordable housing to benefit low, very low, and extremely low-income families and individuals through the State of Idaho's HOME and HTF Programs.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	61
Special-Needs	0
Total	61

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	61
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	61

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

Discussion:

The tables above indicate the number of estimated HOME and Housing Trust Funds rental and homebuyer units to be preserved or created during Program Year 2021. It is noted the totals in each category include both rental and homebuyer units.

AP-60 Public Housing - 24 CFR 91.320(j)

Introduction:

Idaho Housing and Finance administers the Section 8 Housing Choice Voucher program in 34 of 44 Idaho counties and encourages public housing programs statewide, IHFA is only one in a statewide network of public housing providers. IHFA does not oversee any citywide or countywide Participating Jurisdictions (PJs) for public housing. These jurisdictions have local official governing boards responsible to appoint the board of a Public Housing Authority (PHA) and direct PHA activities.

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

- IHFA will continue to administer the Section 8 Housing Choice Voucher Homeownership program, which is currently available only to disabled households and elderly households.
- IHFA will actively apply for additional voucher funding whenever available. IHFA was awarded additional VASH vouchers in 2019 for a total of 185 VASH vouchers, as well as additional "mainstream" vouchers in 2019 and 2020 for a total of 265 Mainstream vouchers.
- In an effort to provide more housing opportunities for voucher holders, IHFA may consider issuing project-based vouchers in some areas of Idaho in 2021. These projects may be limited to certain targeted populations such as persons with disabilities, veterans, or persons experiencing homelessness.
- To date, 44 participants have successfully purchased a home using Section 8 Housing Choice Vouchers that provide mortgage payment subsidy on a long-term basis.

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

IHFA will hold regional PHA Plan hearings and perform outreach in each area that has an IHFA branch office that administers Housing Choice vouchers to encourage participation in a Resident Advisory Board.

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

No Public Housing program within IHFA's jurisdiction is designated "troubled"

Discussion:

AP-65 Homeless and Other Special Needs Activities – 91.320(h)

Introduction

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

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

Due to the geographic diversity of being a balance of state continuum of care, and the rural nature and uniqueness of the many communities within the Idaho BoS CoC, a “one size fits all” approach to conducting outreach to those experiencing homelessness to assess their individual needs is not efficient, practical or effective. Because of these considerations, the Idaho BoS CoC is divided into six regions, with each region having an active Regional Coalition and a Coordinated Entry Access Point.

1. IHFA works with the six Regional Coalitions to help identify effective tools, methods and strategies to effectively conduct outreach to those experiencing homelessness. Additionally, each region works together with their own community partners to help identify the most effective outreach strategies for their unique location and to identify and address barriers within their geographic region. This approach allows flexibility within each geographic region to ensure the outreach is effective given the unique circumstances of each region, while also having the Idaho BoS CoC provide comprehensive coordination and oversight.
2. To help with outreach, the Idaho BoS CoC produces informational brochures, cards and posters which are displayed in Access Point locations and delivered to community stakeholders who may come in contact with those experiencing a housing crisis. Additionally, IHFA, in coordination with the Idaho BoS CoC, maintains and updates a dedicated landing page on its website to make information about housing programs and resources for those who may be experiencing a housing crisis, readily available.
3. The Idaho BoC CoC ensures a broad representation of community stakeholders are participating on the IHCC Board and in Regional Coalitions. This enables the CoC to share up to date information about COC, ESG and HOPWA programs which can then be disseminated throughout the state through a wide variety of resource providers. The IHCC board includes representatives from the Idaho Departments of Education, Labor, Commerce, Corrections, Health and Welfare, as well as representation from DV agencies and HIV/AIDs organizations. Regional Coalitions include representatives from local law enforcement, early childhood education, elected officials, food banks, social workers, and other non-profit organizations who serve those who are or who may become at risk of homelessness.
4. IHFA, in coordination with the Idaho BoS CoC, produces an annual Report to the Community on the state of homelessness in Idaho. This professionally designed booklet provides statistics and shows

trends and needs throughout the state. The booklet is widely disseminated to hundreds of stakeholders, including state and local elected officials, news media, and representatives from hospitals, education, justice, law enforcement, nonprofits and others to increase awareness of the programs available and the needs throughout the state. This helps educate those working with marginalized Idahoans, and increases the distribution of information to them about our programs through this wide array of stakeholders.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Coordinated Entry system went into effect in the BOS CoC on January 22, 2018. Coordinated Entry streamlines and facilitates access to appropriate housing and services. Using a consistent and well-coordinated approach, the process centers on streamlining access to housing assistance, screening applicants for eligibility for these and other programs, and assessing their needs to determine which interventions are most appropriate. This has proved to be an invaluable tool in assessing the vulnerability, needs, and extent of barriers of those experiencing homelessness.

1. We will continue to collect data, which allows homeless provider networks, such as the BoS CoC, understand the homeless population's needs better. Using an objective assessment of each individual or family, allows IHFA to assess which housing component and service types that Idaho is in most need of. "Right sizing," or re-aligning resources with the population need, can then occur. This process will ensure homeless persons are directed towards the resources that have the highest likelihood of reducing their extent of homelessness, or removing them from homelessness altogether. As this shift in resource priority is made, emergency shelters, and rapid rehousing can be utilized as intended; to reduce length of homelessness and re-introduce households to stable living environments.

2. We will continue to support the need for Emergency Shelters throughout the state of Idaho through funding allocations and in all decision-making processes, including outreach to shelters for target populations of domestic violence survivors and youth.

3. IHFA, in coordination with the Idaho BoS CoC, is spearheading the renovation of a former city owned building to repurpose it for a much needed shelter in Pocatello Idaho. Aid for Friends is the only shelter for men, women and families in the area. For the past 30 years, the non-profit operated out of a single family three story home built in the 1930's, making it very difficult to serve those struggling in their community. Many times, the shelter has operated at 114% capacity. Thanks to a community wide fundraising effort, Aid for Friends has started the renovation process on a new and much larger homeless shelter. The new shelter will provide appropriate living quarters for men, women and families. It will include a dining area, laundry facilities and space for education and workforce development opportunities. Aid for Friends anticipates the new shelter will serve almost 1,000 Southeast Idaho residents each year who may be facing or experiencing homelessness. This is an example that IHFA is looking to replicate in other communities in Idaho.

4. The Idaho BoS CoC provides grant funding and support to many agencies who are helping survivors of

domestic violence. By providing the survivors with transitional housing, it enables them to find a safe refuge to be able to rebuild their lives and move on to more permanent housing opportunities. Through education, support, and counseling, these agencies help many families heal and become stably housed.

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

In the absence of appropriate and effective intervention efforts and resources, many families and individuals will become homeless as life changes such as loss of employment, lack of affordable housing, loss of support networks, exit from an institution or facility, and other severe circumstances present themselves. For those that experience these misfortunes, recovery can be extremely difficult when disability, controlled substance or alcohol dependency, or other extreme conditions exist. In some cases long-term and ongoing permanent housing is the most appropriate housing solution. However, IHFA, the BoS CoC, and regional housing coalitions identify the need for services that focus on reducing shelter stays and diverting individuals and families away from homelessness altogether.

IHFA and the BoS CoC acknowledges and supports the commitment to preventing and ending homelessness displayed by HUD through Home Together and Opening Doors. Whether a participant receives housing and service support through transitional or permanent housing, each agency strives to provide individualized goal-based service planning to increase the likelihood for long-term success and self-sufficiency; ensure access to more stable housing situations; and establish support networks and habits that reduce the likelihood of recidivism.

The Idaho BoS CoC provides grants and support to many Permanent Supportive Housing programs throughout the state of Idaho. Additionally, IHFA, who is also the tax credit recipient for the state of Idaho, has added in its QAP, incentive points for developers to add dedicated PSH units in their tax credit properties. Developers are required to partner with agencies who work with those experiencing homelessness to provide supportive services and enter data into HMIS. These additional PSH units are in great need and IHFA is proud of the success this has had in adding PSH units to current and future tax credit projects throughout Idaho.

IHFA has also been instrumental in the development of New Path, which has 40 PSH units serving chronically homeless individuals, providing housing and partnering with health care and service providers to meet the needs of its residents. IHFA also celebrated the opening of Valor Point, a project with 27 PSH units, providing housing and services to housing veterans experiencing homelessness. IHFA is looking for other opportunities to develop similar properties that will provide more PSH units to

vulnerable populations throughout Idaho.

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

Over the next year, the Balance of State CoC will continue to work to help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and (1) those who are being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and (2) those who are receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs. The following goals and strategies will guide this work:

1. We will, over the next year, leverage the work IHFA does in administering the HUD Housing Choice Voucher (HCV) rental assistance program in 34 of the 44 counties in Idaho. The program helps low-income families, the elderly, and disabled individuals obtain decent, safe, and affordable rental housing. IHFA was recently awarded Mainstream Vouchers which target non-elderly disabled individuals who are either chronically homeless or are exiting institutions. Mainstream vouchers have been allocated throughout the CoC's six regions, with clients identified and prioritized in collaboration with the CoC's Coordinated Entry system. This ensures all housing options are made available to clients within this population and facilitates the goal of filling all the mainstream voucher slots to house as many clients as possible within this population.
2. We will continue, over the coming year, to strengthen our relationships with the school systems and the foster care system in Idaho to prevent homelessness among youth aging out of foster care.
3. We will continue, over the coming year, to include key stakeholders at the table to provide input regarding these vulnerable populations. For example, we have representatives from the Idaho Department of Education and the Department of Corrections on our IHCC Board and have many representatives from key stakeholders serving these populations participating in our Regional Coalitions who provide input and direction to our CoC.
4. Over the next year, we will ensure that all agencies receiving ESG funds in Idaho offer services that educate and counsel individuals and families to develop skills that promote self-sufficiency, including connecting to SOAR resources when appropriate.
5. Approximately 40% of the ESG funding not associated with shelter activities is used to fund

Homelessness Prevention efforts. This funding allocation will remain consistent over the coming year. These funds are leveraged with services to assist families or individuals in evaluating their primary cause(s) of becoming or being at risk of homelessness.

6. Over the coming year, we will continue to work with public and private agencies that address housing, health, social services, employment, education, or youth needs in making them aware of the Coordinated Entry system so that those needing housing assistance can be referred and assessed and have access appropriate programs as they are available.

Putting these goals and strategies into action will increase the probability that those needing assistance will improve their housing stability and reduce their risk of experiencing future episodes of homelessness. IHFA also supplements the homelessness prevention dollars provided through the ESG program with private funds raised through the Home Partnership Foundation, providing another resource to help prevent individuals and families from entering the homelessness services system.

Discussion

N/A

AP-75 Barriers to affordable housing – 91.320(i)

Introduction:

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

See Analysis of Impediments to Affirmatively Furthering Fair Housing The current Analysis of Impediments to Affirmatively Furthering Fair Housing (AI) also known as the Fair Housing Assessment is found on the IHFA website at <https://www.idahohousing.com/federal-programs/legal-notice-plans-and-reports/>

Response exceeds the maximum allowable characters- See Unique Appendices

Discussion:

AP-85 Other Actions – 91.320(j)

Introduction:

Actions planned to address obstacles to meeting underserved needs

HOME and HTF- Statewide affordable housing strategies to meet underserved permanent housing needs include the creation and preservation of permanent affordable rental housing throughout Idaho. Once each year IHFA publishes a notice of funding availability for multifamily rental activities and an RFP for single-family rental activities. Once each year, IHFA publishes a request for proposals from non-profit developers and units of local government for the creation of new or rehabilitated homebuyer properties throughout Idaho. Once each year IHFA publishes a notice of grant funding availability for IHFA-certified community-based, non-profit developers (CHDOs).

ESG and ESG-CV - IHFA, in collaboration with the BoS CoC and related networks, will place an emphasis on the following efforts: 1) continue to refine an effective and successful Coordinated Entry System, using meaningful assessments, to help prioritize funding allocations and conduct right-sizing efforts; 2) evaluate Housing First models and concepts to continue developing and promoting similar housing models in Idaho; 3) seek to maintain Unified Funding Agency status to increase efficiencies and coordination within the Continuum of Care program; 4) take advantage of technical assistance approved by HUD to improve collaboration and partnerships among agencies serving homeless persons; and 5) maintain ESG's current impact on the homeless population in Idaho. IHFA and the BoS CoC implemented Coordinated Entry in January 2018. Additionally, IHFA has partnered with the City of Boise to fund construction of a 41 unit Housing First facility, which opened in December 2018, which serves chronically homeless individuals. ESG-CV are being utilized to the prepare, prevent, and respond to COVID-19 infections by providing funding for Shelter Services and Operations, Outreach, Homelessness Prevention, Rapid Rehousing, HMIS/Comparable Database, and Admin.

Actions planned to foster and maintain affordable housing

ESG/ESG-CV - The Idaho Balance of State Continuum of Care has utilized a non-renewable planning grant to help expand current activities and establish governing structures and systems, which ensure proper oversight and coordination of HUD-funded homeless programs. The activities identified by the BoS CoC are coordination activities, project evaluation, participation in the consolidated plan, CoC application activities, and developing a CoC system. Several of these activities include efforts that enhance coordination between public and private housing and service agencies. The CoC has made itself more visible in regional planning and advocacy bodies to ensure all agencies and individuals connected to homelessness issues are familiar with resources available. This promotes and fosters relationships between housing and service providers. ESG and HOPWA providers are also included in the CoC's efforts. ESG-CV are being utilized to the prepare, prevent, and respond to COVID-19 infections by providing funding for Shelter Services and Operations, Homelessness Prevention, Rapid Rehousing,

HMIS/Comparable Database, and Admin.

Actions planned to reduce lead-based paint hazards

IHFA allows HTF and HOME-assisted developers to purchase pre-78 residential housing units with the following requirements: (1) The owner-developer and developer must be an EPA-Certified Renovation Firm; (2) Application for funding must include evidence the area in which the property(s) are located has an adequate supply of EPA-Certified Risk Assessors and Renovation contractors and workers; (3) hard rehabilitation costs minus the LBP hazard assessment, interim controls, and clearance testing cannot not exceed \$24,999 of federal funding per unit.

- HOME and HTF - Whenever funds are awarded to acquire and/or rehabilitate residential housing constructed on or before January 1, 1978, IHFA will require the seller and buyer to comply with the applicable requirements at 24 CFR Part 35, and as determined by the scope of the activity and the amount of federal assistance on a per-unit basis as defined at §31.915. These requirements are enforced through written agreement with the owner.
- Because the State of Idaho does not have a Lead-based paint (LBP) hazard reduction program, the Federal EPA Lead-Based Paint Renovation, Repair, and Paint (RRP) Rule apply. In addition, because HOME is a HUD program, the HUD Lead-Safe Housing Rule (LSHR) also applies to acquisition and/or rehabilitation activities involving pre-78 housing. In those cases when one Federal rule is more restrictive than the other, the most restrictive rule will apply.

When program requirements differ, IHFA will follow the most restrictive.

- Owners are required to follow the EPA RRP Rule and the HUD Lead Safe Housing Rule. Lead-based Paint procedures are identified in the annual Administrative Plan and enforced through written agreement with the owner. LBP tenant disclosures, hazard identification and reduction requirements are monitored during the HOME period-of-affordability.

Actions planned to reduce the number of poverty-level families

IHFA- Households who participate in the federal Section 8 Housing Choice Voucher program are eligible to be part of Idaho Housing's Family Self-Sufficiency (FSS) Program, a voluntary program that helps families become economically independent during the 5-year contract of participation. FSS assists participating families in setting individualized training and service goals, serves to provide case management services that link them to community resources and aims to help them overcome barriers to gainful employment. FSS participants also have the opportunity to accrue money in an interest-bearing escrow savings account as their earned income grows and their rent portion responsibility increases, leading them toward self-sufficiency. When they have completed their self-sufficiency goals, and have been free of welfare for 12 months, the family is eligible to graduate the program successfully and is awarded their escrow earnings.

HOPES Program-

HOPES provides tools and education to help FSS participants move toward homeownership. FSS Participants that qualify and wish to participate must make monthly savings goals and complete HOPES financial education components to graduate. HOPES participants have the opportunity to save \$2,000 at a two-to-one match, which upon successful completion of the program, provides \$6,000 for down payment and closing cost assistance through the Home Partnership Foundation.

HOME/CDBG/HTF- HUD's Section 3 regulation require development activities to include to provide, to the maximum extent feasible, work and training opportunities that target low-income persons/ business concerns when aggregate federal funding in the project meets the applicable Section 3 threshold amounts. Project owners also conduct outreach to Minority/Women-Owned Business Enterprises. Developers are encouraged to use Idaho's Procurement Technical Assistance Center when professional and construction services are needed. Idaho Procurement Technical Assistance Center (PTAC) reaches Disadvantaged and Women Business enterprises, HUD Zone businesses, disabled veteran-owned businesses, and SBA Section 8(a) business around the state.

Actions planned to develop institutional structure

CDBG-Commerce's plans to develop and maintain an institutional structure include providing on-going technical assistance, application workshops, grant trainings, and presentations to potential grantees.

ESG and ESG-CV funds have and will continue to be utilized to provide training to all ESG/ESG-CV subrecipients when requested, needed, or otherwise appropriate, as well as offer ongoing technical assistance to subrecipient staff administering ESG/ESG-CV programs.

HOME will continue to provide technical assistance as needed to help HOME project developers build organizational and development capacity for the type, scope, and complexity of the housing activity to be undertaken.

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

IHFA and IDC will continue to facilitate and participate in stakeholder forums to enhance collaboration and coordination of public, private and faith based service providers for housing, economic

development, and other services:

- The Housing Coordination and Policy Forum (www.ihfa.org/research_hirc_forum.asp)
- Rural Forums
- The Idaho Community Review (www.idahocities.org)
- Idaho Homelessness Coordinating Council
- Idaho's ADA Task Force
- Coalition for Idahoans with Disabilities
- Idaho Hispanic Profile Project
- IHFA Funding Allocation Committee
- Idaho Commission on Aging
- State of Idaho HIV/STD Planning Committee
- Regional Housing Coalitions
- cities and counties
- local planning districts
- USDA-RD

Both IHFA and IDC are participating members of the Fair Housing forum, which works with members of various agencies throughout the State of Idaho to address fair housing concerns.

The Idaho Balance of State Continuum of Care has continually been awarded a planning grant starting during the 2015 program funding competition and continues to be awarded to the BoS CoC up to the present. The non-renewable planning grant is intended to aid CoC's in expanding current activities and establish governing structures and systems which ensure proper oversight and coordination of HUD-funded homeless programs. The activities identified by the BoS CoC are coordination activities, project evaluation, participation in the consolidated plan, CoC application activities, and developing a CoC system. Several of these activities will include efforts that will enhance coordination between public and private housing and service agencies. The CoC will make itself more visible in regional planning and advocacy bodies to ensure all agencies and individuals connected to homelessness issues is familiar with resources available. IHFA and the BoS CoC maintain strong relationships with the regional housing coalitions throughout the state, which allows an exchange of resources and coordinated efforts to flow between the coalitions and promote statewide efforts at ending homelessness. The coalitions continue to promote and foster relationships between housing and service providers. The current 2019 grant awarded is being utilized for similar activities. ESG, ESG-CV and HOPWA providers will be included in the CoC's efforts.

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

Introduction:

CDBG program will spend 70% LMI activities for a three year period. This three year period would be 2020, 2021 and 2022.

HOME & HTF Programs- Single-family and multifamily activities financing and regulatory requirements as well as the award and funding process are found in IHFA's 2021 Annual Administrative Plan at <https://www.idahohousing.com/federal-programs/home-program/>. IHFA reviews and updates its Administrative Plan on an annual basis to ensure these very limited federal affordable housing development programs funds are used in the most effective way possible to create affordable housing and generate program income.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.320(k)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	300,000
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

Annual Action Plan 78
2021

**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.320(k)(2)**

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

Idaho's HOME funds are not used as any other form of investment not otherwise described in 24 CFR 92.205.

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

See Unique Appendices AP-30

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

Beginning on the IDIS Completion date (the date entered in HUD's Integrated Disbursement Information System (IDIS)), a HOME/HTF-assisted activity is required to remain affordable for a specified period of affordability (POA) as determined by HUD, based the amount of HOME/HTF funds invested on a per unit basis. IHFA does not exceed the regulatory minimum POA [§92.254(a)(4) & §93.302 (d)(1)].

During the POA, IHFA monitors the homebuyer annually to verify they continue to reside in the unit as a primary residence. IHFA allows two primary residence exceptions: Active military transfer or deployment or full-time post-secondary education at an institution 50+ miles from the assisted unit. Requirements are fully defined in the current Annual Administrative Plan.

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

See Unique Appendices

**Emergency Solutions Grant (ESG)
Reference 91.320(k)(3)**

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

The BOS CoC Written Standards for the CoC became effective July 1, 2017, which includes coverage of ESG/ESG-CV components and housing types. The Written Standards are continually updated on an as needed basis. The CoC has developed a committee, CoC Planning, to address any concerns or edits of these written standards. ESG and ESG-CV subrecipients are subject to the terms outlined in the Written Standards regarding eligibility criteria, eligible funding types, and assessment of projects for consistency with Housing First Principles.

In conjunction with the Written Standards, IHFA as the ESG and ESG-CV administrator in Idaho currently has a policy manual to identify, highlight, and/or clarify both federal regulations of Title 24 Code of Federal Regulations Part 576 that govern ESG and the procedures used by IHFA, as directed by the U.S. Department of Housing and Urban Development (HUD). Also included are standards for financial management and internal controls at 2 CFR 200. The manual also states IHFA's responsibilities related to environmental regulations found within 24 CFR Part 50 and 58. It is located on IHFA's website, www.idahohousing.com.

To promote and ensure consistency within the administration of ESG and ESG-CV, and across the statewide program, the policy manual states the purpose of the program, the fundamental components of a CoC system, grant application process, the funding methodology instituted by IHFA, and the policies imposed through the governance of the program. General policy determinations include, but are not limited to, record retention, data collection and evaluation, coordinated entry, financial managements, conflict of interest, project monitoring, confidentiality, physical condition of the unit/facility, HMIS participation, matching grant funds, the cost reimbursement process, fair housing, HUD's homeless definitions, and eligible activities. The eligible activities are further defined by project type (shelter, homelessness prevention, and rapid re-housing).

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

Coordinated Entry Access Points in each of the six CoC regions assist clients with their housing and homelessness prevention needs through a consistent and uniform assessment and referral process. Housing prioritization is based on the length of time homeless, vulnerability, and severity of service needs. Clients in need of housing are placed on a centralized, regional queue to ensure those with the greatest need receive assistance. The CoC works in collaboration with the statewide 2-1-1 system, service providers, and other community stakeholders to facilitate client access to the coordinated entry system. Client data and system reporting is administered through HMIS.

The CE process includes multiple assessment tools to evaluate and identify client needs. The process for all clients begins with a Screening Assessment to determine a client's housing status and determine the appropriate path through the system. This step also includes diversion tactics to assist households in remaining housed without the use of homelessness assistance resources. Upon the conclusion of the Screening Assessment, clients who are unable to be successfully diverted to other resources may continue the assessment process based on the screening information. Clients who are at risk of homelessness continue through the process with a Homelessness Prevention Assessment.

Our CoC is committed to assisting individuals experiencing homelessness and who are vulnerable to COVID-19. Anyone who is older than 50 years of age and/or has chronic health issues such as: high blood pressure, heart failure, coronary artery disease, cardiomyopathy, diabetes, chronic obstructive pulmonary disease, other lung conditions, cancer, chronic kidney disease, obesity, pregnancy, sickle cell disease, smoking, auto immune disease, or neurological disease will be prioritized ahead of others on the housing queue with the same score. In order to provide services to a greater number of individuals and households who are at risk of homelessness during the COVID-19 pandemic, the Income-to-Rent Expense Ratio was removed from the Homelessness Prevention Assessment.

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

IHFA's ESG and ESG-CV subrecipients are chosen through a competitive statewide application process. This process includes the following elements:

- Funding availability is announced in Idaho newspapers in each region of the state soliciting project applications from interested state or local governments and non-profit organizations.
- Applications are submitted for review by the Independent Review Panel (IRP). Persons with experience in issues related to homelessness or very low income households were recruited to serve on the IRP. The reviewers are responsible for rating applications using criteria created by IHFA, with the input from the CoC's.
- Members of the IRP score each proposal individually before meeting to reconcile and average all panelists' scores. The resulting averaged score reflects the Panel's collective determination of merit. All applications meeting a threshold score determined by a weighted average were funded. The following includes a summary of the six vital areas that serve as the basis for funding approval:
 - Agency background, including history of service and population served
 - Emergency Solutions needs and/or the service deficiency the project addresses
 - Identify independent elements and/or services requiring funding
 - Goals and objectives and how they would be achieved
 - Outcome measurements and documentation of accomplishments

- Statement describing applicant’s capacity to administer the award from the rating process, sixteen (16) agencies were awarded funding to provide shelter services and operations, and nine (9) agencies were awarded homelessness prevention or rapid re-housing activities in their respective regions of the state. All applicants were evaluated based on their threshold score. For the qualifying applicants, documentation is required regarding the following functional areas in the technical submission:
 - Grant budget
 - Homeless Participation and representation on the Board of Directors
 - Insurance coverage
 - Matching funds
 - Local government certifications
 - Accounting certifications
 - Various assurances
 - Various authorizations
 - Facility description and capacities. Upon making final awards, grant agreements are provided with instructions, policies, and procedures for implementing the Emergency Solutions Grant. Sub recipients request reimbursement on a monthly or bi-monthly basis. Expenditure receipts must accompany the request for funds, documenting eligible grant activities performed by the agency within a 60-day period. IHFA monitors grant spending until all awarded funds are depleted for each contracted agency. Grant Agreements are in effect for the duration of the grant (one year).
 - When special/additional funding is made available to the ESG program, such as ESG-CV funding, the Recipient may allocate those funds through an internal process to expedite awards. Factors affecting this distribution may include timing of the award, timeliness of expenditures, performance, need, and HUD or CoC priorities.
4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

Due to the nature and extensive range of services and programs provided by and through Idaho Housing and Finance Association, adhering to the requirement to place a homeless or formerly homeless individual on the grantee’s Board is not possible. However, the ESG and ESG-CV programs attempt to pair program structure and governance activities with the CoC program, and actively participates in CoC activities. IHFA Homeless Programs Department staff actively participate in the administration of ESG, ESG-CV, and COC programs and compliance. We rely on the inclusion of a formerly homeless individual on the CoC Board as sufficiently meeting the requirements of 24 CFR 576.405 (a).

5. Describe performance standards for evaluating ESG.

Performance standards set by IHFA staff, with the recommendations and input of the BoS CoC's Board, the Idaho Homelessness Coordinating Committee, are used to evaluate target outcomes set for each project participating in the program. The following performance measures have been established for ESG:

- Targeting Applicants In Most Need of Assistance Seventy-five percent (75%) of participants presenting with two or more barriers to housing stability at assessment are able to obtain stable housing within 60 days. Achievement of this goal will be verified using HMIS data or a comparable database.
- Reducing Number of Those Living On Streets or In Shelters Fifty percent (50%) of participants who are literally homeless upon assessment will be diverted from shelter and rapidly re-housed; or Seventy-five percent (75%) of clients receiving homelessness prevention will not enter a HUD-funded shelter or rapid re-housing program within twelve (12) months of receiving assistance. Achievement of the applicable goal will be verified using HMIS data or a comparable database.
- Shortening Length of Homelessness Fifty percent (50%) of participants living in shelter will exit to permanent housing within sixty (60) days of shelter entry. Achievement of this goal will be verified using HMIS data or a comparable database.
- Reducing Housing Barriers or Risk of Housing Stability Fifty percent (50%) of participants will exit the program receiving at least on mainstream resource in addition to housing. Achievement of this goal will be verified using HMIS data or a comparable database. Goal achievement will factor into future funding applications. Organizations who do not meet the performance standards may not be funded.

Housing Trust Fund (HTF)
Reference 24 CFR 91.320(k)(5)

1. How will the grantee distribute its HTF funds? Select all that apply:

Applications submitted by eligible recipients

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".

N/A

3. If distributing HTF funds by selecting applications submitted by eligible recipients,

a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Eligible recipients are owners-developers registered as a Business Entities with the State of Idaho, in Good Standing with IHFA, have demonstrated experience and capacity to own, develop, manage, and market federally assisted rental housing, and are familiar with the requirements of other federal housing programs that may be used in conjunction with CPD funds. These requirements help to ensure compliance with applicable requirements and regulations. Demonstrated experience includes completing previous projects on time, within approved budget, with no outstanding material findings or non-compliance during the period of affordability.

b. Describe the grantee’s application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

MINIMUM APPLICATION THRESHOLD CRITERIA

Most recent 3rd party CPA-prepared financial statement from applicant, developer, and owner (e.g. general partner). Owner statement not required if entity is newly formed.

Physical Needs Assessment required for all acquisition and/or rehabilitation projects. PNA will determine the scope of rehabilitation. See Chapter 2 for PNA requirements.

Capitol Needs Assessment- Needed for all projects- In sufficient detail to determine amount of funds needed for replacement and repairs during the life of the project. See Chapter 2 for specific requirements.

All operating costs must be described in sufficient detail to compare line items against properties that are similar in physical type and size, so that the PJ may determine whether the planned expenditures are sufficient and reasonable. The operating budget should include general management expenses, maintenance and operating costs, any project paid utilities, taxes, insurance premiums, and adequate deposits to replacement reserves. In most cases, evaluation of total operating costs should be summarized in “per unit per year” amounts rather than as a percentage of projected revenue.

Market Study-See Exhibit M for requirements

Fair Housing

Affirmatively Furthering Fair Housing (AFFH) Resolution adopted by the proposed project’s unit of local government (City or County) depending on the location of the project) If the local government has not adopted AFFH Resolution, the application does not meet minimum threshold and will not be scored.

Applicant will submit one of the following:

If the proposed activity is located in a CDBG Non-Entitlement area, submit the local jurisdiction's most recent Fair Housing Assessment Plan reviewed by the State of Idaho's CDBG Program (Idaho Department of Commerce); or

If the proposed activity is located in a CDBG Entitlement Area (Boise, Nampa, Meridian, Lewiston, Coeur d' Alene, Idaho Falls, Caldwell, and Pocatello), submit that city's most recent Analysis of Impediments To Affirmatively Further Fair Housing. If the city's Analysis of Impediments or Affirmative Housing Assessment document is available online, then applicant need only provide IHFA with the link to the online document (hard copy would not be required); or

If the local jurisdiction in which the property will be located has never received State CDBG funds (and hasn't completed a Fair Housing Assessment Plan on their own), or the project will not be located in a CDBG Entitlement area, then applicant must request a Fair Housing Assessment Plan be completed by the local jurisdiction. The plan must contain the same components as the State of Idaho's CDBG Program.

Evidence the applicant and developer have the experience and capacity to begin construction within 12 months and complete the project within a reasonable time period

Evidence of site control that complies with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and Environmental Review Procedure 24 CFR 58.22 (See Chapter 6, 9 and Exhibit O)

Owner/Developer/Management Capacity Self-Certification Form (See Exhibit W)

Pro forma that incorporates the following assumptions:

7% vacancy factor

2% annual increase in income

3% annual increase in expenses including replacement reserves

Release of Information (See Exhibit X)

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

In addition to the minimum threshold criteria described in 3.b. (above), HTF applications/proposals undergo receive a full review of additional criteria. This includes type, scope, and description of the project, per-unit investment, proposed project reserves, other proposed funding sources/programs, debt service coverage ratio, proposed loan or repayment structure, ownership structure, federal cross-cutting requirements, local planning and zoning approval, proposed tenant preference population(s), match contribution, development timeline, developer capacity, and proximity to essential services based on tenant population (based on proposed tenant population, i.e. elderly, family, special needs), green building, energy efficiency, site/unit design and amenities, etc.

d. Describe the grantee’s required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Geographic Diversity

3 pts

A. Minimum threshold criteria as defined in the annual Administrative Plan

<https://www.idahohousing.com/documents/admin-plan-ch8-home-rental-activities-application-2.pdf>

B. Project site complies with Site and Neighborhood Standards [24 CFR Part 92.202 and §983.57(e)(2) & (3)];

C. Project site is located in an Opportunity Incentive Area (Located in a census tract with a poverty rate that is less than or equal to the corresponding city's Persons in Poverty Rate. If the city's population is less than 5,000, or if the development is located in a census tract located outside of the corresponding city limits, then the site's census-tract poverty rate will be compared against the corresponding county's Person in Poverty Rate.)

e. Describe the grantee’s required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Applicant Capacity

2 pts.

Must meet A-C

A. Owner/developer has experienced development staff or are partnering with an experienced development entity;

B. Developer has experience developing other federal affordable housing programs;

C. Developer has a proven track record developing projects within a reasonable timeframe- Funds were committed within 6 months of award, construction began within 12 months of award, and project completed in IDIS within 2 years.

f. Describe the grantee’s required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Project-based Rental Assistance

2 pts.

The extent to which the project has project-based rental assistance. Other mechanisms that ensure affordability for extremely low-income households, such as operating assistance reserves, may also be considered. 2 Pts.

g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

In addition to the 30-year HTF Period of Affordability, the multifamily rental owner commits to an LIHTC extended use period that extends the period of affordable on the project to a total of 40 years. During the extended use period, the household income and rent levels continue to be restricted. During the LIHTC Extended Use Period, owner must commit to the non-displacement of all HTF tenants housed under the original HTF rent and income restrictions. 2 pts.

h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Project will provide a housing preference (minimum 3 units) for 2 of the 3 Priority Housing Needs categories below, as identified in the Consolidated Plan.

3 pts.

- ≤30% AMI (families or individuals)
- Elderly (at least one member of the household is age 62+)
- Disabled

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

To be considered, the application must document all sources of funding committed at the time the application is submitted. For scoring purposes, "commitment" is defined as a letter from the issuing

entity and outlines the source of funding and the purpose of the funding (permanent loan, construction loan, interim financing, etc.).

3 pts

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

6. Performance Goals and Benchmarks. The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes

7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds. Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

Idaho's HOME Maximum Per-unit Subsidy Limits are 240% of the base limit for the Section 234 Mortgage Insurance Program. Idaho is defined as a high cost percentage exception area under 212(e)(1) of NAHA by HUD's Office of Multifamily Housing.

In determining the most appropriate maximum per-unit subsidy limits for the HTF program, IHFA reviewed the amount of HOME funds invested on a per-unit basis throughout Idaho over three program years (2013-2015). HOME-assisted units were located throughout Idaho, including high cost and resort areas. In most instances, the HOME per-unit maximum subsidy limits were more than sufficient to meet the financing needs of the project. Accordingly, IHFA has determined the HOME Per-Unit Maximum Subsidy limits are an appropriate per-unit subsidy limit for the Housing Trust Fund Program.

8. Rehabilitation Standards. The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

The HTF Rehabilitation Standards are available online in the 2021 Annual Administrative Plan Exhibit C-2 at <https://www.idahohousing.com/federal-programs/home-program/>

9. Resale or Recapture Guidelines. Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A- Idaho's HTF program is not used for homebuyer activities.

10. HTF Affordable Homeownership Limits. If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter “N/A”.

N/A

11. Grantee Limited Beneficiaries or Preferences. Describe how the grantee will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the grantee will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter “N/A.”

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

Tenant Selection Criteria & Preference Populations

(1) Limit the housing to income eligible families;(2) Are reasonably related to the applicants’ ability to perform the obligations of the lease (i.e., to pay the rent, not to damage the housing; not to interfere with the rights and quiet enjoyment of other tenants); (3) Limit eligibility or give a preference to a particular segment of the population if permitted in its written agreement with the grantee (and only if the limitation or preference is described in the grantee’s consolidated plan). (i) Any limitation or preference must not violate nondiscrimination requirements in § 93.350. A limitation or preference does not violate nondiscrimination requirements if the housing also receives funding from a Federal program that limits eligibility to a particular segment of the population (e.g., the Housing Opportunity for Persons With AIDS program under 24 CFR part 574), and the limit or preference is tailored to serve that segment of the population.(ii) If a project does not receive funding from a Federal program that limits eligibility to a particular segment of the population, the project may have a limitation or preference for persons with disabilities who need services offered at a project only if: (A) The limitation or preference is limited to the population of families (including individuals) with disabilities that significantly interfere with their ability to obtain and maintain housing; (B) Such families will not be able to obtain or maintain themselves in housing without appropriate supportive services; and (C) Such services cannot be provided in a non segregated setting. The families must not be required to accept the services offered at the project. In advertising the project, the owner may advertise the project as offering services for a particular type of disability; however, the project must be open to all otherwise eligible persons with disabilities who may benefit from the services provided in the project. (4) Do not exclude an applicant with a voucher under the Section 8 Tenant- Based Assistance: Housing Choice

Voucher program (24 CFR part 982) or an applicant participating in a HOME tenant-based rental assistance program (24 CFR part 92) because of the status of the prospective tenant as a holder of such voucher or comparable HOME tenant-based assistance document. (5) Provide for the selection of tenants from a written waiting list in the chronological order of their application, in so far as is practicable; and (6) Give prompt written notification to any rejected applicant of the grounds for any rejection.

Idaho's current Five-Year (2020-2024) Consolidated Plan has identified three (3) Priority Housing Needs (PHN) Populations: Elderly, Disabled, and $\leq 30\%$ AMI households. Permanent rental housing owners may choose to provide a tenant preference for any one or more of these PHN populations. If approved by IHFA, the priority Housing needs Population(s) will be identified as a tenant preference(s) in the HTF written agreement.

12. Refinancing of Existing Debt. Enter or attach the grantee's refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter "N/A."

See Unique Appendices- AP-90 Refinance of Existing Debt.

Discussion:

No response