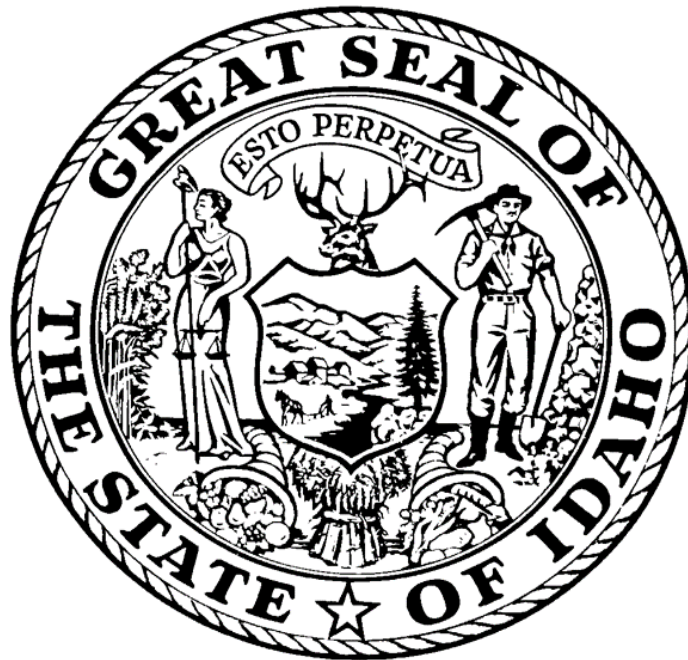


2025-2029 Five Year Consolidated Plan and 2025 Annual Action Plan  
For Idaho's Federal Community Development and  
Affordable Housing & Development Programs



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# Executive Summary

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

### 1. Introduction

The State of Idaho receives approximately \$17 million in block grant funds annually from the U.S. Department of Housing and Urban Development (HUD) for affordable housing and community development programs. These programs include the Community Development Block Grant Program (CDBG), the HOME Investment Partnerships Program (HOME), the Emergency Solutions Grant program (ESG), and the Federal Housing Trust Fund (HTF).

As State Grantees of these HUD-CPD programs, Idaho Housing and Finance Association (IHFA) (HOME, HTF, and ESG) can award funds anywhere in the state, while the Idaho Department of Commerce (IDC) can award CDBG funds anywhere in the state except for local CDBG entitlement areas. Although IHFA is not a State Agency, it does administer the State's housing programs. HUD refers to IHFA and IDC collectively as the "State."

State Grantees are required to submit a long-term plan to HUD summarizing the state's housing and community development needs, priorities, goals, and strategies for the next five (5) years. This document is the ***Five-Year Consolidated Plan***.

Each year in the Consolidated Plan is based on a Program Year that begins April 1st and ends March 31st of the subsequent year. Beginning with the first Program Year of the Consolidated Plan, Grantees draft an ***Annual Action Plan*** to HUD identifying each program's annual allocation, goals, strategies, and outcomes. The APP is submitted to HUD within 60 days of notification from HUD of allocation amounts for the CPD programs. Within 90 days of the end of the program year, Grantees are required to submit a report to HUD that evaluates individual program performance during the program year. This report is the Consolidated Annual Performance Evaluation Report (CAPER).

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

The primary objective of the Consolidated Plan is to improve the quality of life of principally low- and moderate-income Idahoans, by creating suitable living environments, improving the availability of affordable housing and enhancing economic opportunities. The Needs Assessment process identified a number of overarching needs within the community. These formed the basis for the following adopted in the Consolidated Plan, which are:

1. Create and Preserve Affordable Rental Housing
2. Create Affordable Homeownership Opportunities

3. Improve Public Facilities
4. Improve Public Infrastructure
5. Support Housing-related Activities
6. Support Economic Development
7. Cleanup of blighted properties
8. Support Planning Studies
9. Homeless Shelter Operations, Homelessness Prevention, and Rapid Rehousing

These priority needs were considered in the development of the goals set forth in this Plan. The State’s goals for the 2025-2029 Consolidated Plan follow:

1. Public Facilities/Infrastructure-Compliance
2. Public Facilities/Infrastructure-Rehabilitation
3. Public Facilities/Infrastructure-New Construction
4. Economic Development-Job Creation
5. Economic Development-Downtown Revitalization
6. Provide Suitable Living Environment
7. Provide Decent Affordable Housing

### 3. Evaluation of past performance

The grantees prepare and submit a Consolidated Annual Performance Evaluation Report (CAPER) to HUD 90 days after the start of the next program year. Due to these submission requirements, the evaluation of past performance in this Consolidated Plan will include 4 of the 5 years in the current 2020-2024 Consolidated Plan at the time of submission to HUD.

A summary of accomplishments can be found in the Unique Appendices. A chart summarizing the annual allocations for each program is below:

	CDBG	HOME	ESG	HTF
<b>2024</b>	\$8,236,180	\$4,987,264	\$1,115,776	\$3,144,833
<b>2023</b>	\$7,944,686	\$6,067,311	\$1,117,066	\$3,066,413
<b>2022</b>	\$7,641,562	\$5,974,010	\$1,103,073	\$2,982,433
<b>2021</b>	\$8,008,952	\$5,249,159	\$1,099,467	\$3,101,884
<b>2020</b>	\$7,769,225	\$5,245,528	\$1,110,270	\$3,000,000
<b>TOTAL</b>	<b>\$39,600,605</b>	<b>\$27,523,272</b>	<b>\$5,545,652</b>	<b>\$15,295,563</b>

Over the last five years the State received \$5,545,652 in ESG funding. ESG program funds were to be used for the following eligible activities: shelter, homelessness prevention, and rapid re-housing, data collection, and administration. IHFA's goal was to, through collaboration with and participation in the Balance of State Continuum of Care (BoS COC) and Boise City/Ada County Continuum of Care, continually impress a positive impact upon the homeless families and individuals in Idaho. As data collection evolved through HMIS/CMIS and CoC innovations, ESG funds were to be used in a manner that best fits the needs of those seeking the refuge it can offer. (A COC is a local or regional planning body that coordinates funding and services for people experiencing homelessness, aiming to end homelessness and provide stable housing and support. A BoS COC is a system, often encompassing rural areas and smaller cities, that addresses homelessness by coordinating efforts to provide housing and services, often in areas not covered by other COCs.)

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

IDC and IHFA held two public comment periods for this draft Consolidated Plan and First Year Annual Action Plan – (1) a pre-drafting 30-day comment period for the public and stakeholders to provide the opportunity for input prior to drafting the Plan was held from December 16, 2024 through January 14, 2025 with a public hearing held on January 2; and (2) a second 30-day public comment period on the full draft plan was held from April 7, 2025 through May 8, 2025 with a public hearing held on April 23, 2025 after its publication. No comments were received during the pre-draft comment period. Comments received during the second comment period are to be determined.

Following the current public participation plan, notification of each comment period was published in Idaho's major newspapers distributed through IHFA and Commerce email distribution lists, and posted at IHFA branch offices and on the IHFA and Commerce websites. 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. The notice directed readers where to request the plan in a form that is accessible to persons with disabilities and persons with limited English proficiency and how to submit comments.

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

The Public Participation Plan for Idaho's HUD-CPD programs is available on the IHFA website at <https://www.idahohousing.com/federal-programs/legal-notice-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	HOME Programs Department
CDBG Administrator	IDAHO	Idaho Department of Commerce
HOPWA Administrator	IDAHO	N/A
HOME Administrator	IDAHO	HOME Programs Department
ESG Administrator	IDAHO	Homelessness Programs
	IDAHO	HOME Programs Department

Table 1 – Responsible Agencies

### Narrative

Idaho Housing and Finance Association (IHFA) 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

HTF - Idaho Housing and Finance Association

ESG - Idaho Housing and Finance Association

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

### 1. Introduction

IHFA and Commerce are committed to working with local agencies and service providers to create solutions to best address the needs of residents across the state. This Consolidated Plan and First Year Action Plan is the result of months of collaboration between multiple organizations, agencies and local stakeholders. The entities that have provided input and insight into the final plan are discussed in the following sections.

**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 events each year. The events 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. They bring 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, House Idaho Collaborative (HIC – formerly “IHCC”), Idaho Fair Housing Forum, Idaho's disability advocates and centers, Idaho Health & Welfare-Environmental Health, and 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 (aka the House Idaho Collaborative or HIC) and the Boise City Ada County Continuum of Care (aka Our Path Home) has also emerged. This encourages greater awareness to the statewide issue of homelessness and provides space for the sharing of best practices and successful models throughout Idaho. The HIC has and continues to invite state agencies to participate in homelessness resolution discussions and HIC board planning sessions and activities. This body creates strategic plans designed to meet the challenges in the Balance of State Continuum of Care (BoS COC). (A COC is a local or regional planning body that coordinates funding and services for people experiencing homelessness,

aiming to end homelessness and provide stable housing and support. A BoS COC is a system, often encompassing rural areas and smaller cities, that addresses homelessness by coordinating efforts to provide housing and services, often in areas not covered by other COCs.) 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 may allow for a set aside up to 15% of the annual per capita tax credit amount to address special housing need populations.

If this set aside is not utilized by the IHFA) r if qualified applications are not received, the set-aside will be made available to other qualified non-targeted applications. If utilized, IHFA will announce specific guidelines that may apply to the application for these funds at least 120 days prior to the application round. Specific guidelines will be included in the Notice of Funding Availability (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.**

ESG funding from HUD is awarded to the State of Idaho, and it is through the Office of the Governor that IHFA is designated to administer these funds on behalf of the State. As the recipient, IHFA allocates funding across the entire state of Idaho, with the goal of promoting community-wide commitment to prevent and end homelessness. Programs in Idaho work to quickly re-house homeless individuals and families while minimizing the trauma and dislocation they have experienced, promoting access to mainstream resources and programs, and encouraging self-sufficiency. IHFA's Homelessness Programs team manages statewide efforts to this end, including the administration of Coordinated Entry (CE) and the Homeless Management Information System (HMIS) in addition to CoC and ESG grants.

The recipient hosts biannual housing roundtables to facilitate communication and build strong partnerships among housing stakeholders, including representatives from public and private agencies, as well as business and civic leaders. Input gained in these public forums is utilized when developing policies, performance standards, and program evaluation. Information is also utilized to modify the allocation structure of ESG funding among eligible activities.

To support efforts to address the needs of homeless persons and persons at risk of homelessness, subrecipients that receive ESG and CoC funding are required to use a Coordinated Entry (CE) system for housing prioritization. CE utilizes Access Points to administer assessments, and it is through this system that individuals and families are prioritized. To address the needs of

chronically homeless individuals and families with children, housing prioritization includes length of time homeless and children in the household as prioritization factors. Further refinement includes the prioritizing groups including veterans, survivors of domestic violence, youth, and households with a person age 62+.

The Housing Idaho Collaborative (HIC) has several committees that help guide work and ensure resources are maximized. The Guiding Idaho Committee develops policies and procedures, which are adopted into the HIC's Governance Charter. Such work ensures the ESG operates in an effective manner to meet the goals and strategies adopted.

The Informing Idaho Committee evaluates outcomes of projects and activities assisted by ESG funds. The committee works in conjunction with the recipient, who serves as the HMIS lead agency, on projects involving HMIS and other data sources within the HIC to provide a comprehensive picture of clients, services provided, and unmet needs, and coordinates requirements for the statewide HMIS. Data collection, reporting, and evaluation involves HUD funded programs, other federal partners including Veteran Affairs and Health & Human Services, faith-based organizations and nonprofit agencies not participating in HMIS.

Six Regional Coalitions from the BoS CoC are comprised of representatives from public and private agencies that address housing, health, social services, victim services, employment, and education needs of low-income, homeless, and special needs populations. These geographically diverse coalitions each have a voting representative on the HIC Board and meet regularly to assess the homeless housing and supportive service gaps in their region, providing for the timely dissemination of information to a diverse set of service providers.

**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 Continuum of Care (CoC) organizations: one for Boise City/Ada County, which represents one region, and is called Our Path Home, and a second for the Balance of State (BoS), which represents six regions and is called The House Idaho Collaborative (HIC). The Guiding Idaho Committee serves as the governing body for the HIC. The chair of the Boise City/Ada County CoC sits on the HIC board, and therefore, has a voice in statewide efforts to address the needs of homeless persons through ESG and CoC funding. The HIC also reserves seats on the board for individuals representing institutions and systems of care that may discharge persons into homelessness, such as healthcare, veteran affairs, and corrections. Other board

seats are reserved for individuals representing education, medical centers, employment, commerce, and lived experience

Through the Idaho BoS CoC, Guiding Idaho and the recipient oversee the allocation of ESG funds, and work collaboratively on the development of policies, performance standards, and program evaluation. Subcommittees including Access Point Lived Experience Panel, and Youth Action Board support this governing structure, as their input ensures that scarce resources devoted to alleviating homelessness are maximized by filling identified gaps in service in communities throughout Idaho.

Using benchmarks derived from the System Performance Measures, the Informing and Housing Idaho Committees will develop performance standards for ESG-funded projects, helping the BoS determine what small steps can be taken to address homelessness issues throughout the state. These committees have established several areas on which to focus their work, including methods for identifying those most at risk for becoming homeless for the first time and developing outreach and engagement strategies to reach those who are not currently connected to the BoS’s system of providers.

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

See Unique Appendices for additional organizations invited to participate in the consultation process.

<b>Agency/Group/Organization</b>	<b>Agency/Group/Organization Type</b>	<b>What section of the Plan was addressed by Consultation?</b>	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>
1. Altura (EDD)	Services – Employment;  Services – education;  Business Leaders;  Civic Leaders	Housing Needs Assessment; Homeless Needs – chronically homeless, families with children; Homelessness	Participated in targeted stakeholder interview to discuss community development, affordable housing, infrastructure and public transportation needs, workforce needs, and economic development.

		Strategy; Non-homeless special needs; Market Analysis; non-housing community development strategy	
2.CEDA (EDD)	Services – Elderly persons;  Services – Education;  Services – employment;  Business Leaders  Civic Leaders	Housing Needs Assessment; Non-homeless special needs; non-housing community development strategy; Market Analysis; Public Housing Needs; Anti-poverty strategy	Participated in a targeted stakeholder interview to discuss economic development needs, workforce training, housing, and community development needs.
3.City of McCall	Other govt - local	Housing Needs Assessment; Non-homeless special needs; non-housing community development strategy; Public Housing Needs; Anti-poverty strategy; Market Analysis.	Participated in targeted stakeholder interview.  Agency was invited to participate in the stakeholder survey and to attend community meetings to provide feedback around community needs, existing resources, and ways to address gaps for the State’s most vulnerable residents using HUD funds.
4.City of Sandpoint	Other govt - local	Housing Needs Assessment; Non-homeless special needs; non-housing community development strategy;	Participated in targeted stakeholder interview to provide feedback around community needs, existing resources, and ways to address gaps for the State’s most vulnerable residents using HUD funds.

		Public Housing Needs; Anti-poverty strategy; Market Analysis.	
5. Panhandle Area Council (EDD)	Services – Education;  Regional Organization  Business Leaders	Housing Needs Assessment; Non-homeless special needs; non-housing community development strategy; Market Analysis; Public Housing Needs; Anti-poverty strategy	Participated in targeted stakeholder interview to discuss housing affordability, infrastructure and economic development needs, and workforce training.
6. RIVDA (EDD)	Services – Education;  Regional Organization  Business Leaders	Housing Needs Assessment; Non-homeless special needs; non-housing community development strategy; Market Analysis; Public Housing Needs; Anti-poverty strategy	Participated in targeted stakeholder interview to provide feedback around community needs, existing resources, and ways to address gaps for the State’s most vulnerable residents using HUD funds.
7. SICOG (EDD)	Services – elderly persons;  Services – Education  Services – Employment  Regional Organization  Planning Organization	Housing Needs Assessment; Non-homeless special needs; non-housing community development strategy; Market Analysis; Public Housing Needs; Anti-poverty	Participated in targeted stakeholder interview

	Civic Leaders	strategy; Homelessness needs – chronically homeless	
8. Advocates Against Family Violence	Services – children; Services – victims of domestic violence Services – health Services - education	Housing Need Assessment; Homeless needs – families with children; non-homeless special needs	Participated in community meetings to provide feedback around community needs, existing resources, and ways to address gaps for the State’s most vulnerable residents using HUD funds.
9. Aid for Friends	Housing Services – children, homeless, education, health	Housing needs assessment; public housing needs; homeless needs – chronically homeless, families with children, veterans, unaccompanied youth; homelessness strategy; anti-poverty strategy	Participated in targeted stakeholder interview to provide feedback around community needs, existing resources, and ways to address gaps for the State’s most vulnerable residents using HUD funds.
10. CATCH, Inc.	Housing Services – Homeless, health, education	Housing Needs assessment; Public Housing Needs; Homeless needs – families with children, chronically homeless, veterans, unaccompanied youth; homelessness strategy	Participated in targeted stakeholder interview to provide feedback around community needs, existing resources, and ways to address gaps for the State’s most vulnerable residents using HUD funds.



11. Family Promise of the Palouse	Housing Services – children, homeless, health	Housing Needs Assessment; Non-homeless special needs; non-housing community development strategy	Participated in community meetings to provide feedback around community needs, existing resources, and ways to address gaps for the State’s most vulnerable residents using HUD funds.
12. Jesse Tree	Housing Services – homeless, Fair Housing, education	Housing Need Assessment; Public Housing Needs; Homelessness strategy; non-homeless special needs; Market Analysis	Participated in community meetings to provide feedback around community needs, existing resources, and ways to address gaps for the State’s most vulnerable residents using HUD funds.
13. Safe Passage	Housing Services – children; victims of domestic violence, health, education	Housing Needs Assessment; non-homeless special needs; homeless needs – families with children, unaccompanied youth; homelessness strategy	Participated in targeted stakeholder interview to discuss homelessness needs, domestic violence, and service needs in the community.
14. Salvation Army Lewiston	Services – children, elderly persons, persons with disabilities, homeless, health, education, employment	Housing Need Assessment; Public Housing Needs; Homelessness strategy; non-homeless special needs; Market Analysis	Participated in community meetings to provide feedback around community needs, existing resources, and ways to address gaps for the State’s most vulnerable residents using HUD funds.
15. Sojourners’ Alliance	Housing Services - homeless	Housing Needs Assessment; public housing needs; homeless	Participated in targeted stakeholder interview to provide feedback around community needs, existing resources, and ways to address gaps for the

		needs – chronically homeless, families with children, veterans, unaccompanied youth; homelessness strategy	State’s most vulnerable residents using HUD funds.
16.St. Vincent de Paul	Housing Services – homeless, health	Housing Needs Assessment; public housing needs; homeless needs – chronically homeless, families with children, veterans, unaccompanied youth; homelessness strategy; Market Analysis	Participated in targeted stakeholder interview. Agency also participated in community meetings to provide feedback around community needs, existing resources, and ways to address gaps for the State’s most vulnerable residents using HUD funds.
17.ARCH	Housing; Civic Leaders	Homeless Needs Assessment; Public Housing Needs; Market Analysis; Homeless Needs; Homelessness strategy	Participated in targeted stakeholder interview to provide feedback around community needs, existing resources, and ways to address gaps for the State’s most vulnerable residents using HUD funds.
18.Moscow Housing Trust	Housing	Housing Needs Assessment; Market Analysis	Participated in community meetings to provide feedback around community needs, existing resources, and ways to address gaps for the State’s most vulnerable residents using HUD funds.

19.North Idaho Habitat for Humanity	Housing	Housing Needs Assessment; Non-homeless special needs; non-housing community development strategy; Market Analysis; Lead-based paint strategy	Participated in targeted stakeholder interview to discuss housing, service needs, infrastructure needs, and special needs population needs in the community.
20.Department of Commerce, Office of Broadband	Other govt - local	Housing Needs Assessment; Non-homeless special needs; non-housing community development strategy; Market Analysis	Participated in community meetings to provide feedback around community needs, existing resources, and ways to address gaps for the State’s most vulnerable residents using HUD funds.
21.Idaho Division of Veterans Services	Other govt - local	Housing Needs Assessment; Non-homeless special needs; non-housing community development strategy	Participated in targeted stakeholder interview
22.HartWest, LLC	Housing	Housing Needs Assessment; Public Housing Needs; Homelessness Strategy; Market Analysis	Participated in targeted stakeholder interview. Agency also participated in community meetings to provide feedback around community needs, existing resources, and ways to address gaps for the State’s most vulnerable residents using HUD funds.
23.Family Medicine Health Center	Services – Health; education	Non-homeless special Needs; HOPWA Strategy	Participated in targeted stakeholder interview to provide feedback around community needs, existing resources, and ways to address gaps for the State’s most vulnerable residents using HUD funds.

24.EICAP – Eastern Idaho Community Action Partnership	Housing Services – elderly persons, children	Housing Need Assessment; Public Housing Need; Non-homeless special needs	Participated in targeted stakeholder interview
25.Idaho Falls Rescue Mission	Services – children, homeless, health, education	Housing Needs Assessment; non-homeless special needs	Participated in community meetings to provide feedback around community needs, existing resources, and ways to address gaps for the State’s most vulnerable residents using HUD funds.
26.Gary E. Hanes & Associates	Service – fair housing, legal	Housing Needs Assessment; non-homeless special needs	Participated in community meetings to provide feedback around community needs, existing resources, and ways to address gaps for the State’s most vulnerable residents using HUD funds.
27.NeighborWorks Boise	Housing Services - Education	Housing Needs Assessment; Non-homeless special needs; non-housing community development strategy	Participated in community meetings to provide feedback around community needs, existing resources, and ways to address gaps for the State’s most vulnerable residents using HUD funds.
28.Region IV Development Association	Housing	Housing Need Assessment; Market Analysis	Participated in community meetings to provide feedback around community needs, existing resources, and ways to address gaps for the State’s most vulnerable residents using HUD funds.

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

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

The State attempted to engage as many stakeholders as possible for input into the plan through the stakeholder survey, stakeholder consultations or community meetings, and public input meetings.

**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?
The Housing Availability and Affordability Study for Kootenai County	University of Idaho	Provided information on housing affordability concerns.
Idaho Rural Partnership Strategic Plan 2024 - 2029	Idaho Rural Partnership	Provided information on housing in rural areas.
Idaho Broadband Strategic Plan (2022-2027)	State of Idaho	Provided information for the discussion on broadband access.
The Idaho State Hazard Mitigation Plan (SHMP) (2023)	State of Idaho	Provided information for the discussion on hazard mitigation.

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

**Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan (91.315(l)).**

Idaho’s Balance of State Continuum of Care governing board (Guiding Idaho Committee) includes representation from multiple state departments, including the Department of Health and Welfare, the Department of Commerce, the Department of Labor, the Department of Education, the Department of Corrections, and the Department of Veteran Affairs. IHFA distributed solicitations for funding priority recommendations to the Balance of State CoC, which includes these departments. Additionally, entitlement communities were contacted with a request for comment.

**Narrative (optional):**

## **PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 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**

The State utilized a variety of citizen participation tools throughout the process to allow input on the planning process. This included a digital survey of residents and stakeholder, stakeholder interviews, community meetings, and public input sessions. The comments received from these various forums were integrated into the development of the Plan in selecting priority needs and establishing goals.

### **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	Surveys	Non targeted/broad community	<p>The Idaho Consolidated Plan 2025-2029 Needs Assessment Resident Survey and Stakeholder Survey asked respondents various questions about the housing and community service needs throughout the state. The resident survey received 16 responses and the stakeholder survey received 28 responses.</p> <p>The 2025-2029 CDBG survey asked respondents a variety of questions about the non-housing community development needs of Idaho's cities and counties. The survey received 92 responses.</p>	Outcomes of the survey results are presented throughout this document.	All comments were accepted	

2	Stakeholder Interviews	Targeted stakeholders were interviewed to collect expertise on housing and community development topics.	19 stakeholder organizations were interviewed to collect expertise on housing and community development topics.	Input from stakeholder interviews are presented throughout this document.	All comments were accepted	
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3	Public Meetings	Non targeted/broad community	<p>Four community meetings that covered housing, infrastructure and facilities, social services, economic development, and general resident perspectives were held in different cities economic development, and general resident perspectives were held in different cities around the state. These meetings took place:</p> <p>Couer d’Alene; September 24<sup>th</sup>, 2024</p> <p>Idaho Falls; September 25<sup>th</sup>, 2024</p> <p>Twin Falls; September 25<sup>th</sup>, 2024</p> <p>Boise; September 26<sup>th</sup>, 2024</p>	All comments were accepted		
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4	Public Hearings	Non targeted/broad community	January 2, 2025 April 23, 2025		All comments were accepted	
5	Public Comment Period	Non targeted/broad community	A public comment period on the draft Consolidated Plan was held from April 7 – May 8, 2025.		All comments were accepted	

**Table 4 – Citizen Participation Outreach**

## **Survey Results**

The Idaho Consolidated Plan 2025-2029 Needs Assessment Surveys for both Stakeholders and Residents highlighted the priority need for more affordable housing. In both the resident survey and of the stakeholder survey, 100% of respondents indicated that affordable housing needs have increased over the past five years. Top indicated priority housing needs included rental housing for both extremely low-income households and low-income households, acquisition of property to construct affordable housing units, and both homeownership opportunities and downpayment assistance for low-income residents. Working low-income households were noted as being the households most in need of housing. Affordability, waiting lists, and land and construction costs were highlighted as the most challenging barriers to accessing affordable housing. Construction of permanent supportive housing, rehabilitation or expansion of facilities, and emergency shelters were noted as being top priorities for homelessness needs. Top public facility needs included community centers and youth or daycare centers, domestic violence centers, and homeless shelters. Public infrastructure needs included sewer systems, sidewalk improvements, street repair, solid waste disposal, and stormwater drainage. Youth care services, childcare services, transportation services, and senior services were all noted as service priorities.

A summary of the survey results is included in the Community Participation Appendix.

# Needs Assessment

## NA-05 Overview

### Needs Assessment Overview

The Needs Assessment provides an overview of the impacts of this growth on housing availability, affordability, and quality. It includes the following sections:

- **Housing Needs Assessment:** data on population, income level, number and type of households, and housing problems. For the purpose of this section, housing problems are defined as:
  - Lack of complete kitchen facilities.
  - Lack of complete plumbing facilities.
  - Cost burden: the allocation of more than 30% of gross household income toward housing costs. For renters, housing costs include rent paid by the tenant plus utilities; for owners, housing costs include mortgage payment, taxes, insurance, and utilities. This section includes data on severe cost burden, as well, which is paying more than 50% of gross household income on housing costs.
  - Overcrowding: more than one person per room, not including bathrooms, porches, foyers, halls, or half-room.

HUD default data for this section are from the 2000 Census (Base Year); 2016-2020 American Community Survey (ACS); and the 2016-2020 CHAS (Comprehensive Housing Affordability Strategy).

- **Disproportionately Greater Need:** when the members of a racial or ethnic group at a given income level experiences housing problems (as defined above) at a greater rate (10% or more) than the income level for the County as a whole.
- **Public Housing:** information on the number and type of public housing units and the characteristics of residents is presented. For the purpose of this section, “public housing” includes traditional public housing units subsidized by annual contribution contracts (ACC) and former public housing units that have been converted to “affordable housing” under the Rental Assistance Demonstration (RAD) program. Data on voucher programs is provided, as well.
- **Homeless Needs Assessment:** the nature and extent of homelessness in using data from the Homeless Management Information System (HMIS).
- **Non-Homeless Special Needs Assessment:** housing needs for persons who are not homeless but require supportive services are presented. These populations include the elderly, frail elderly, persons with disabilities, and persons with alcohol or other drug addictions. HUD default data is not provided; data used to assess these needs is appropriately cited. HOPWA data requested as part of this eConPlanning Suite

template is based on CDC HIV Surveillance Data and the HOPWA CAPER and HOPWA Beneficiary Verification Worksheet.

- **Non-Housing Community Development Needs:** non-housing community development needs (i.e., public facilities, public improvements, and public services) is based on input from consultations/community input and local plans and reports as HUD default data is not provided.

### ***Alternate Data Used in the Needs Assessment***

To provide the most current representation of needs in Idaho, where available, GIS Maps are used to support the data tables. All maps are based on 2018-2022 ACS data.

Given data lags in the e-ConPlanning Suite and the available mapping data at the time of development of this assessment, where possible and useful to understanding current challenges, additional narrative has been added with alternative data sources to provide a more current snapshot of certain data points.

Definitions to guide the understanding of this Plan are provided in the Unique Appendices.

## NA-10 Housing Needs Assessment - 24 CFR 91.305 (a,b,c)

### Summary of Housing Needs

See Unique Appendices.

Demographics	Base Year: 2009	Most Recent Year: 2020	% Change
Population	1,567,582	1,754,367	11.9%
Households	579,408	737,411	27.3%
Median Income	\$46,778	\$58,915	26%

**Table 2 - Housing Needs Assessment Demographics**

**Data Source:** 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

### Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	67,790	70,225	113,540	67,520	290,045
Small Family Households	17,500	21,700	38,455	27,410	144,090
Large Family Households	3,980	6,660	13,885	8,230	32,265
Household contains at least one person 62-74 years of age	12,955	15,310	24,740	14,660	68,915
Household contains at least one person age 75 or older	8,845	12,070	16,645	7,540	20,845
Households with one or more children 6 years old or younger	9,925	13,170	22,810	13,535	34,595

**Table 3 - Total Households Table**

**Data Source:** 2016-2020 CHAS

## Housing Needs Summary Tables

### 1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	1,940	1,075	1,120	410	4,545	550	520	410	240	1,720
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	550	415	450	145	1,560	120	270	205	215	810
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	1,220	1,840	1,870	675	5,605	300	930	1,735	630	3,595
Housing cost burden greater than 50% of income (and none of the above problems)	23,705	8,165	1,295	105	33,270	13,135	9,240	6,205	1,225	29,805

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	4,220	15,610	13,880	1,515	35,225	4,200	8,760	18,470	7,765	39,195
Zero/negative Income (and none of the above problems)	4,940	0	0	0	4,940	4,385	0	0	0	4,385

**Table 4 – Housing Problems Table**

Data 2016-2020 CHAS  
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	27,415	11,495	4,740	1,335	44,985	14,105	10,955	8,560	2,310	35,930
Having none of four housing problems	8,745	23,180	39,265	19,645	90,835	8,200	24,595	60,980	44,235	138,010



	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Household has negative income, but none of the other housing problems	4,940	0	0	0	4,940	4,385	0	0	0	4,385

**Table 5 – Housing Problems 2**

Data 2016-2020 CHAS  
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	10,500	10,415	6,355	27,270	3,965	5,310	8,645	17,920
Large Related	2,060	2,340	1,725	6,125	1,115	1,950	3,010	6,075
Elderly	5,380	4,810	2,805	12,995	8,840	8,185	8,315	25,340
Other	12,750	8,610	5,455	26,815	3,920	3,215	5,245	12,380
Total need by income	30,690	26,175	16,340	73,205	17,840	18,660	25,215	61,715

**Table 6 – Cost Burden > 30%**

Data 2016-2020 CHAS  
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	9,110	3,075	320	12,505	3,335	2,745	1,755	7,835
Large Related	1,615	535	35	2,185	870	665	410	1,945
Elderly	4,045	1,960	745	6,750	6,225	4,060	2,650	12,935

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Other	10,955	3,480	610	15,045	3,055	1,970	1,410	6,435
Total need by income	25,725	9,050	1,710	36,485	13,485	9,440	6,225	29,150

**Table 7 – Cost Burden > 50%**

Data 2016-2020 CHAS  
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Single family households	1,895	1,960	1,955	685	6,495	385	1,030	1,580	685	3,680
Multiple, unrelated family households	40	95	225	150	510	74	215	370	135	794
Other, non-family households	160	240	205	40	645	0	0	20	35	55
Total need by income	2,095	2,295	2,385	875	7,650	459	1,245	1,970	855	4,529

**Table 8 – Crowding Information – 1/2**

Data 2016-2020 CHAS  
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

**Table 9 – Crowding Information – 2/2**

**Describe the number and type of single person households in need of housing assistance.**

According to HUD 2018-2022 Census data, 24.74% of all households in the State of Idaho were single-person households, or 167,052 households. This is a -1.4% decline from 2017 in which

26.13% of households were single-person households. Renters are more likely than homeowners to live in single-person households and renter households are more likely to be cost burdened. The chart below shows the counties that have the highest densities of single-person households. Elderly residents living in single-person households and on fixed incomes may need housing assistance.

See Unique Appendices for a table.

**Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

See Unique Appendices.

**What are the most common housing problems?**

Housing cost burden is the most common housing problem in the State of Idaho. Resources spent on housing become unavailable for transportation, health care, childcare, and education. All these factors reinforce each other creating an economic situation that is difficult to exit. High housing costs reduce the availability of reliable transportation which prevents access to new economic opportunities which then makes it difficult to earn enough money to cover housing expenses.

A housing unit is considered cost-burdened when between 30% and 50% of its income goes toward housing costs, and severely cost-burdened when housing costs consume more than 50% of a household's income as shown in Tables 8 and 9 above. Table 7 shows that 74,420 households are cost-burdened, and 63,075 households are severely cost burdened. Out of all households that experience a housing problem, 45.2% experience cost burden and 38.2% experience extreme cost burden.

**Are any populations/household types more affected than others by these problems?**

Renter and owner households between 0-50% AMI are most affected by cost-burdening. Table 9 shows that out of the 134,920 combined owner and renter households that were cost-burdened, 93,365 were in income categories between 0-50% AMI (69.2%). Renter households experience cost burden at a higher rate than homeowner households – 42% of renter households and 19.94% of homeowner households experience housing cost burden, while 17.95% of renter households and 7.7% of homeowner households experience severe housing cost burden.

Small, related renter households are most likely to be cost burdened and extremely cost burdened. For owner occupied households, the elderly population is most likely to be affected by cost burdened and severe cost burden.

**Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

Low-income, cost-burdened residents are most at risk of becoming unsheltered. HUD defines extremely low-income households as those earning 0-30% of the Area Median Income (AMI) and considers households spending over 50% of their income on housing to be severely cost burdened. According to 2016-2020 CHAS data from the Housing Needs Summary Tables, the most pressing issue for extremely low-income households and families with children in Idaho is the limited availability of affordable housing. In Idaho, approximately 13,485 extremely low-income homeowner households and 30,690 extremely low-income renter households are severely cost burdened, meaning they contribute over half of their income to housing costs. Together, these nearly 50,000 households are at high risk of housing instability and potential homelessness.

The data also shows that Idaho had 9,925 extremely low-income households with children and 8,845 extremely low-income households with at least one person aged 75 or older. These families are vulnerable residents facing significant housing challenges, underscoring the need for targeted interventions to support and stabilize housing for the city's most vulnerable residents. Addressing these affordability issues is essential to prevent housing instability and promote long-term security for low-income families and households in Idaho.

Families and individuals receiving rapid re-housing assistance and nearing the termination of that assistance indicated a need for affordable rental housing and stable employment to effectively continue beyond the re-housing assistance. Those nearing termination of assistance are connected with resources to identify affordable housing options available to them. Because rapid rehousing projects may determine their own desired maximum timeframes, there is no data estimating the number of individuals nearing the termination of rapid rehousing assistance.

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

The State of Idaho does not provide estimates of its at-risk populations.

**Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

Extremely low-income households with a severe housing cost burden are more likely to lose their homes in the event of loss of employment, health issues, or other unexpected expenses. Unemployment and underemployment have been among the primary reasons for families losing their homes. Cost burden is by far the most common housing problem and threatens housing stability.

To assist in homelessness prevention in rural areas, investment in job training and effective transportation infrastructure will be important as Idaho's primary population growth continues in the urban areas of the state.

**Discussion**

The data demonstrates value in exploring owner-occupied rehabilitation with federal resources. Rehabilitation is often cheaper and preserves naturally occurring affordable housing. In rural areas, there may not be access to programs in assisting with the preservation of an owner's existing property.

## NA-15 Disproportionately Greater Need: Housing Problems - 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

A disproportionately greater housing need exists when the members of racial or ethnic group at a given income level experience housing problems at a greater rate (10% points or more) than the income level as a whole. The following tables analyze housing problems experienced by different racial and ethnic groups across income ranges in the State of Idaho.

### 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	49,968	8,590	9,381
White	41,486	7,245	7,507
Black / African American	449	100	60
Asian	426	134	527
American Indian, Alaska Native	932	222	98
Pacific Islander	34	30	0
Hispanic	5,297	679	1,012

**Table 10 - Disproportionally Greater Need 0 - 30% AMI**

Data 2016-2020 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	46,812	23,424	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
White	38,914	19,971	0
Black / African American	182	115	0
Asian	442	186	0
American Indian, Alaska Native	600	397	0
Pacific Islander	14	10	0
Hispanic	5,686	2,370	0

**Table 11 - Disproportionally Greater Need 30 - 50% AMI**

Data 2016-2020 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

#### 50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	45,671	68,018	0
White	38,259	57,646	0
Black / African American	491	238	0
Asian	500	620	0
American Indian, Alaska Native	559	820	0
Pacific Islander	83	75	0
Hispanic	5,112	7,774	0

**Table 12 - Disproportionally Greater Need 50 - 80% AMI**

Data 2016-2020 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

## 80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	12,975	54,591	0
White	11,373	47,552	0
Black / African American	4	185	0
Asian	233	438	0
American Indian, Alaska Native	129	463	0
Pacific Islander	0	14	0
Hispanic	1,080	5,261	0

**Table 13 - Disproportionally Greater Need 80 - 100% AMI**

Data 2016-2020 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

## Discussion

### 0-30% AMI

None of the racial or ethnic groups have a disproportionately greater need (10% or more than the than the income level as a whole) in the 0-30% AMI category. All groups experience housing problems at rates within or below the jurisdiction as a whole's rate of 76.3%.

### 30-50% AMI

66.6% of households in this income category experience housing problems. None of the racial or ethnic categories experience disproportionate need at 10% or higher than the jurisdiction as a whole. 70.4% of Asian households and 70.6% of Hispanic households experience housing problems – although these do not meet the criteria for disproportionately greater need, they are the groups that have the highest rate of housing problems.

### 50-80% AMI

40.17% of households in this income category experience housing problems. Two racial groups have a disproportionately greater housing need compared to the overall jurisdiction. 67.35 of Black/African American households with 50-80% AMI experience housing problems, which is about 27% more than the jurisdiction as a whole. 52.53% of Pacific Islander households in this



income category experience housing problems, which is about 12% more than the jurisdiction as a whole.

80-100% AMI

19.2% of households in this income category experience housing problems. Asian households in this income group have a disproportionately greater housing need – 34.72% of Asian households with 80-100% AMI experience housing problems.

## NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.305(b)(2)

**Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.**

### Introduction

This section compares the existence of housing problems amongst racial groups against that of the jurisdiction as a whole in an effort to determine if any group(s) share a disproportionate burden of the area’s housing problems. For this purpose, HUD guidelines deem a disproportionately greater need exists when persons of a particular racial or ethnic group experiences housing problems at a rate of at least 10 percentage points higher than the jurisdiction as a whole.

### 0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	41,578	16,966	9,381
White	34,616	14,143	7,507
Black / African American	349	195	60
Asian	283	282	527
American Indian, Alaska Native	736	422	98
Pacific Islander	34	30	0
Hispanic	4,440	1,515	1,012

**Table 14 – Severe Housing Problems 0 - 30% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

**30%-50% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	22,452	47,769	0
White	18,394	40,425	0
Black / African American	133	169	0
Asian	308	320	0
American Indian, Alaska Native	264	731	0
Pacific Islander	14	10	0
Hispanic	2,975	5,089	0

**Table 15 – Severe Housing Problems 30 - 50% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

**50%-80% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	13,310	100,299	0
White	10,687	85,114	0
Black / African American	90	645	0
Asian	187	923	0
American Indian, Alaska Native	191	1,191	0
Pacific Islander	8	150	0
Hispanic	1,961	10,945	0

**Table 16 – Severe Housing Problems 50 - 80% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

## 80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,648	63,835	0
White	2,941	55,908	0
Black / African American	0	189	0
Asian	94	578	0
American Indian, Alaska Native	69	519	0
Pacific Islander	0	14	0
Hispanic	484	5,867	0

**Table 17 – Severe Housing Problems 80 - 100% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

## Discussion

### 0-30% AMI

71.02% of households in the State of Idaho with 0-30% AMI experience severe housing problems. No racial or ethnic group has a disproportionately greater need.

### 30-50% AMI

31.97% of households with 30-50% AMI experience severe housing problems. There are three racial groups disproportionately affected by severe housing problems in this category: (1) 44.04% of Black/African American households, (2) 49.04% of Asian households, and (3) 58.33% of Pacific Islander households experience severe housing problems.

### 50-80% AMI

11.72% of households in this income range experience severe housing problems. No racial or ethnic group with 50-80% AMI are disproportionately affected.

### 80-100% AMI

5.41% of households in this income range experience severe housing problems. No racial or ethnic group are disproportionately affected.

## NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.305 (b)(2)

**Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.**

### Introduction

According to HUD, disproportionate need refers to any need for a certain race/ethnicity that is more than ten (10) percentage points above the need demonstrated for the total households within the jurisdiction at a specific income level. The tables and analyses below identify the share of households by race/ethnicity and income level experiencing housing cost burdens as outlined by HUD guidelines.

Disproportionate need for each race/ethnicity is determined by calculating the share of the total number of cost burdened and severely cost burdened households from each race/ethnicity and comparing that figure to the share of all Idaho households.

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	439,671	90,957	68,502	10,045
White	387,889	77,438	58,764	8,040
Black / African American	1,785	714	413	60
Asian	4,703	1,014	733	527
American Indian, Alaska Native	4,193	1,045	970	123
Pacific Islander	446	75	52	0
Hispanic	34,886	8,884	6,104	1,131

**Table 18 – Greater Need: Housing Cost Burdens AMI**

Data Source: 2016-2020 CHAS

### Discussion

#### 0-30% AMI

50.3% of households in the income category experience cost burden. 88.2% of White households in this income group experience housing cost burden and are disproportionately affected.

30-50% AMI

50.5% of households in the income category experience cost burden. 85.1% of White households in this income group experience housing cost burden and are disproportionately affected.

50% and above AMI 50.5% of households in the income category experience cost burden. 85.8% of White households in this income group experience housing cost burden and are disproportionately affected.

## NA-30 Disproportionately Greater Need: Discussion – 91.305 (b)(2)

**Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

### 30-50% AMI

- **Severe Housing Problems:** Black/African American households, Asian households, and Pacific Islander households are disproportionately affected by severe housing problems.
- **Housing Cost Burden:** White households are disproportionately affected by housing cost burden.

### 50-80% AMI

- **Housing Problems:** Black/African American households and Pacific Islander households in this income category disproportionately experience housing problems.
- **Housing Cost Burden:** White households are disproportionately affected by housing cost burden.

### 80-100% AMI

- **Housing Problems:** Asian households disproportionately experience housing cost burden.
- **Housing Cost Burden:** White households are disproportionately affected by housing cost burden.

**If they have needs not identified above, what are those needs?**

There is an overall need for more affordable housing for all income categories.

**Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

The racial groups that have identified disproportionate needs (discussed above) are Black/African Americans, Pacific Islanders, and Asians. However, these groups are very small percentages of the population of Idaho (according 2020 Census data).

- Black/African Americans: 0.86% of Idaho's population
- Pacific Islanders: 0.2% of Idaho's population
- Asians: 1.46% of Idaho's population



## NA-35 Public Housing – (Optional)

### Introduction

The Totals in Use numbers provided below by HUD below illustrate the Vouchers and Public Housing administered by Idaho Housing and Finance Association (IHFA).

IHFA administers the Section 8 Housing Choice Voucher program in 34 of 44 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 PHA and direct PHA activities. The State of Idaho does not own or administer any public housing.

### Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	75	3,241	0	2,984	19	9	196

**Table 19 - Public Housing by Program Type**

**\*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: PIC (PIH Information Center)

## Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	0	0	31	0	31	0	0
# of Elderly Program Participants (>62)	0	0	16	563	0	546	2	0
# of Disabled Families	0	0	36	1,540	0	1,324	10	4
# of Families requesting accessibility features	0	0	75	3,241	0	2,984	19	9
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

**Table 20 – Characteristics of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

## Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	73	3,129	0	2,876	19	9	192
Black/African American	0	0	1	28	0	27	0	0	1
Asian	0	0	1	3	0	3	0	0	0

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
American Indian/Alaska Native	0	0	0	74	0	72	0	0	2
Pacific Islander	0	0	0	7	0	6	0	0	1
Other	0	0	0	0	0	0	0	0	0

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

**Table 21 – Race of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

### Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	6	214	0	197	1	1	12
Not Hispanic	0	0	69	3,027	0	2,787	18	8	184

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

**Table 22 – Ethnicity of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

## **Section 504 Needs Assessment:**

### **Describe the needs of public housing tenants and applicants on the waiting list for accessible units:**

The State of Idaho does not own or manage any public housing units.

### **What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?**

See Unique Appendices.

### **How do these needs compare to the housing needs of the population at large**

People with disabilities and homeless are over-represented in the waitlists for Housing Choice Vouchers. Idaho's general population for those with disabilities is 14.1% and 13/10,000 for homeless. Those who are elderly, are slightly under-represented by about 3%, based on ACS data. However, in rural areas, elderly represent 21.4% of the population.

The needs of public housing residents and HCV holders are more specialized and immediate due to their lower income levels, reliance on subsidies, and systemic barriers. While the general population shares some similar concerns, they typically experience less severe and critical pressures and may have more options to address housing challenges. Addressing housing needs for both groups requires tailored policies, including expanding affordable housing, reducing discrimination, and increasing housing supply across all income levels.

### **Discussion:**

With limited affordable housing options, waitlist data demonstrates the importance of housing stability with a voucher. While vouchers are limited, a concerning trend is landlords charging a higher rent for voucher holders over non-voucher holders. This is a double edge sword, while the landlord is collecting rents in alignment with the market, it reduces the ability to serve other households, as the funding for vouchers is set for each PHA. To mitigate this, IHFAs Compliance department has implemented some maximum rent increases, which has been helping.

## NA-40 Homeless Needs Assessment – 91.305(c)

### Introduction:

The following tables contain information derived from Idaho’s Balance of State CoC 2023 Point-In-Time count and Homeless Management Information System (HMIS). The Balance of State CoC covers 43 of Idaho’s 44 counties. Ada County is not included in the Balance of State data. Idaho’s homelessness issues are exacerbated by the rural nature of the state and the severe funding limitations.

One of the primary measures of homelessness in Idaho is the Point-In-Time Count, which occurs during the last 10 days of January each year. The count is executed during a time when the weather is typically very cold and individuals and families experiencing homelessness are utilizing all resources that are available to them, such as sleeping on a friend’s couch. Thus, the effort provides a minimum count of those that are homeless who are presumed to have exhausted resources previously available through support networks. Of those counted, more than 58% were unsheltered, an increase from 49% in the 2018 Point-In-Time Count.

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
			6,057	4,503	4,207	75
Persons in Households with Adult(s) and Child(ren)	386	348	3,377	2,742	2,539	77
Persons in Households with Only Children	1	0	63	61	62	19

Persons in Households with Only Adults	281	595	2,560	1,753	1,656	68.5
Chronically Homeless Individuals	33	142	385	156	152	118
Chronically Homeless Families	15	23		81	67	149
Veterans	22	51	166	90	84	74
Unaccompanied Child	1	0	63	61	62	19
Persons with HIV	1	1	6	6	5	28

**Table 26 - Homeless Needs Assessment**

**If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):**

Indicate if the homeless population is: Partially Rural Homeless

A large majority of Idaho consists of rural communities with small metropolitan areas widely spread throughout the state. While the Homeless Needs Table consists of a statewide portrayal of homelessness, including both urban and rural statistics, the data is more reflective of rural homelessness than not.

## Rural Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
			6,057	4,503	4,207	75
Persons in Households with Adult(s) and Child(ren)	386	348	3,377	2,742	2,539	77
Persons in Households with Only Children	1	0	63	61	62	19
Persons in Households with Only Adults	281	595	2,560	1,753	1,656	68.5
Chronically Homeless Individuals	33	142	385	156	152	118
Chronically Homeless Families	15	23		81	67	149
Veterans	22	51	166	90	84	74
Unaccompanied Child	1	0	63	61	62	19
Persons with HIV	1	1	6	6	5	28

Table 27 - Homeless Needs Assessment

**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
White	518	777
Black or African American	16	5
Asian	2	1
American Indian or Alaska Native	28	111
Native Hawaiian or Other Pacific Islander	16	1
Multiple Races	88	48
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
Hispanic	202	211
Not Hispanic	466	732

**Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.**

Of the fifteen (15) chronically homeless families with children, more than half (55%) were unsheltered. Of *all* homeless households with children, 51% were unsheltered. Those families that are not chronically homeless are more likely to be sheltered. Of the 734 persons in households with adults and children, 47% were unsheltered. Of the 38 persons in chronically homeless households with adults and children, nearly 61% were unsheltered.

There were approximately 73 veterans experiencing homelessness on a single night. Most veterans, nearly 70%, were unsheltered.

**Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.**

The majority of individuals and families experiencing homelessness are White (~80%), which is reflective of Idaho’s demographic makeup. The American Indian or Alaskan Native population experience homelessness at the second highest rate (9%). The American Indian or Alaskan Native population experiences unsheltered homelessness at a higher rate than other populations – 71.9% of the American Indian or Alaska Native population experienced unsheltered homelessness compared to 46% of the overall population.



### **Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

The Point in Time count summary for January 25, 2023, indicated that 58.5% of all persons experiencing homelessness are unsheltered, while 80% of all American Indian or Alaska Native persons experiencing homelessness are in an unsheltered situation. Of the 943 individuals that were unsheltered, 191 (20%) were children under the age of 18.

#### **Discussion:**

Based on the Point in Time Count data, homelessness in the Idaho Balance of State CoC has shown an increase of 28% over the past 5 years (2018- 2023) including an increase in unsheltered homelessness by nearly 57%. This is happening despite the increased number of individuals utilizing emergency shelters, which rose by more than 22% in the same period. Affordable housing is the biggest barrier to achieving stability.

## NA-45 Non-Homeless Special Needs Assessment – 91.305 (b,d)

### **Introduction**

The non-homeless special needs assessment includes the elderly, developmentally disabled, persons with disabilities, persons with HIV/AIDS, and persons with drug and alcohol addictions. Services for these populations are critical in the prevention of homelessness. Common special needs populations identified in the State's community meetings and targeted stakeholder interviews included accessible housing for those living with disabilities, services to help seniors or those on fixed incomes, services and housing for those exiting incarceration, and affordable and accessible childcare for those working non-traditional hours.

### **Describe the characteristics of special needs populations in your community:**

Many persons with such special needs also have very low incomes. Therefore, their needs may have already been considered in estimating the housing needs of persons with very low incomes. However, for some people, supportive housing – housing with supportive services – is needed as they are unable to undertake the activities of daily living (ADL) without assistance.

**Seniors:** According to 2018-2022 Census Data, a little over 16% of the State's population was aged 65 or older. Seniors are considered a special needs group because of their typically limited incomes, mobility limitations, and need for health care and other supportive services. Many seniors live on fixed incomes and/or have disabilities, creating financial pressures that can reduce independence, especially as costs rise.

**Persons with disabilities:** According to the 2018-2022 Census data, nearly 17% of the State's population was living with one or more disabilities. Nearly 35% of those aged 65 or older in Idaho were living with a disability. Ambulatory disabilities are the highest disability types for those aged 65 or older, followed by independent living difficulties (because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor's office or shopping). There is a need for more housing assistance for those living with disabilities, especially the elderly population.

**Persons with drug/alcohol addictions:** People with substance use disorders typically have unique needs, including mental health support, housing stability, and long-term recovery programs.

**HIV/AIDS:** Please see discussion below.

**What are the housing and supportive service needs of these populations and how are these needs determined?**

**Seniors:** Housing options for the elderly range from independent living to assisted living, nursing homes, and support facilities like adult day care. Key considerations include location, affordability, proximity to healthcare and essential services, and ease of upkeep. As health issues become more common with age, elderly individuals benefit from access to healthcare and assistance with daily activities such as shopping and housekeeping. Proximity to essential services and reliable transportation is critical as mobility decreases, and safety becomes a growing concern for those living alone. The 2018-2022 ACS estimates that over 9% of seniors over 65 years old in Idaho lived below the poverty level. These seniors may need housing assistance, ranging from repairs on homes they own to subsidized rental assistance.

**Persons with disabilities:** According to the Center for Disease Control, current estimates of disability prevalence in the United States from different data sources range from 8% to over 30% of the population, depending on how disability is defined. In the 2018-2022 ACS data, 12.9% of adults in the U.S. have some type of disability, compared to 13.7% in Idaho. ACS data also shows that people who are physically disabled are more likely to be living in poverty and therefore more in need of both housing and supportive service needs. Of those over 16 with a physical disability, 15.9% of people live in poverty as compared to 8.4% of those who do not have a disability. Many individuals with disabilities rely on a fixed income, limiting their housing options. There is a need for more affordable, accessible housing units for those living with disabilities.

#### **Persons with drug/alcohol addiction:**

**Overdoses:** The Idaho Division of Public Health publishes the Drug Overdose Prevention Program dashboard that summarizes information on overdoses and death related to controlled substances. In 2023, 386 deaths linked to drug overdose with 264 related to opioids and 197 related to Fentanyl. Emergency department visits related to drug use totaled 3,896 and 569 of those were related to opioid overdose.

**Youth:** The Idaho Healthy Youth Survey (IHYS) is a bi-annual, statewide survey of 6th, 8th, 10th, and 12th graders facilitated by the Idaho Office of Drug Policy (ODP). The Survey is designed to measure the perceptions, opinions, attitudes, and behaviors of Idaho youth related to the use and misuse of alcohol, tobacco, e-cigarettes/vaping, marijuana, prescription medication, and other drugs.

The 2021 IHYS was administered to nearly **10,000 Idaho students** at **54 schools** in **24 Districts**.

#### **Statewide results of Idaho 12th graders found that in the past month:**

- 1 in 5 drank alcohol
- 1 in 5 used a vape pen or e-cigarette
- 1 in 7 used marijuana

**Statewide results from students of all 6th, 8th, 10th, and 12th graders found that:**

- 34% said it is easy to get alcohol
- 24% said it is easy to get prescription drugs for the purpose of misuse
- 17% said it is easy to get tobacco
- 18% said it is easy to get marijuana

**Resources:** The Idaho Office of Drug Policy (ODP) leads Idaho’s substance use and misuse policy and prevention efforts by developing and implementing strategic action plan and collaborative partnerships to reduce alcohol and other drug use and related consequences. In Spring 2023, ODP partnered with WestEd’s Justice & Prevention Research Center to conduct the Prevention Services Resource Inventor to capture information on substance misuse prevention resources across the State.

**Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

See Unique Appendices.

**If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))**

IHFA during the five-year Consolidated Plan will develop a HOME TBRA program. Eligible households will include those meeting a special needs population. This will not be an activity until at least 2027, as IHFA will need to develop the program.

**Discussion:**

None

## NA-50 Non-Housing Community Development Needs - 91.315 (f)

### **Describe the jurisdiction's need for Public Facilities:**

Over 86% of the CDBG non-housing community development needs survey responses indicated a high need for public facilities and infrastructure funding set-asides.

Based on the local government needs survey conducted by Commerce in July of 2024 (survey results attached) the top three public facility needs are for improvements of parks and recreation facilities, fire/EMT stations, and senior centers.

### **How were these needs determined?**

The needs of the state CDBGs' jurisdictions (cities and counties) for public facilities, public improvements (infrastructure), services, and economic development activities is based on a number of variables. These variables include geographic locations, economic variables, population, governance philosophies, and the existing services provided by the city or county. The responses received from jurisdictions across the state assisted in determining need along with feedback at community meetings.

### **Describe the jurisdiction's need for Public Improvements:**

Based on the local government needs survey, the top needs are water, sewer, streets, and sidewalk systems. These results were supported by feedback at community meetings.

### **How were these needs determined?**

See Unique Appendices.

### **Describe the jurisdiction's need for Public Services:**

Based on community consultation, the top service needs in the community relate to services for children, especially daycare services, services for seniors, and assistance to address mental health and substance misuse.

### **How were these needs determined?**

These needs were determined based on community consultation with residents as meetings across the state as well as with stakeholders through one-on-one interviews.

# Housing Market Analysis

## MA-05 Overview

### **Housing Market Analysis Overview:**

In Idaho, single-family homes account for the majority of homes throughout the State. According to 2018-2022 Census data, about 70% of occupied households are owners and 30% are renters. The median home value increased by a staggering 87.6% between 2017 and 2022 and almost 20% of homeowners were cost burdened in 2022. The median gross rent increased by about 34% statewide between 2017 and 2022, and 42% of renters were cost burdened in 2022. As housing costs continue to rise, more households are experiencing cost burden and other housing problems.

About 41% of the State's housing stock was built prior to 1980. Older housing units may be in need of rehabilitation or critical repairs. About 47% of the City's renter-occupied housing stock was constructed prior to 1980 and 42% of owner-occupied housing stock was built before 1980. Overall, renters are almost twice as likely to have a housing problem than homeowners – 48.4% of renter households experience one or more housing conditions and only 21.2% of homeowner households experience one or more housing conditions.

## MA-10 Number of Housing Units – 91.310(a)

### Introduction

Data provided from the 2016-2020 ACS estimated that the State of Idaho had 701,196 housing units, of which 77% are single-family homes. 15% of housing units are duplexes, quadruplexes, or smaller multifamily buildings (less than 20 units), 3% are larger multifamily buildings (20+ units), and 8% are mobile homes, boats, RV's, vans, or other (as shown in Table 30).

Among occupied households, 421,439 are homeowners and approximately 187,685 are renters. 82% of homeowner households have 3 or more bedrooms, while only 43% of renter units have 3 or more bedrooms. 38% of renter households have 2 bedrooms, 15% have 1 bedroom, and 4% have no bedrooms (as shown in Table 31).

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	515,886	74%
1-unit, attached structure	20,420	3%
2-4 units	46,829	7%
5-19 units	34,328	5%
20 or more units	24,316	3%
Mobile Home, boat, RV, van, etc	59,417	8%
<b>Total</b>	<b>701,196</b>	<b>100%</b>

Table 23 – Residential Properties by Unit Number

Data Source: 2016-2020 ACS

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	1,530	0%	7,669	4%
1 bedroom	8,915	2%	28,652	15%
2 bedrooms	64,006	15%	71,340	38%
3 or more bedrooms	346,988	82%	80,024	43%
<b>Total</b>	<b>421,439</b>	<b>99%</b>	<b>187,685</b>	<b>100%</b>

Table 24 – Unit Size by Tenure

Data Source: 2016-2020 ACS

**Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.**

Within the State of Idaho, Housing Choice Vouchers represent the majority of units and households assisted by federal, state, and local programs. The majority of households, 85%, are White households. Out of the White households that receive Housing Choice Vouchers, about 57%, fall within the 0-80% AMI range, while about 15% fall within the 0-30% AMI range.

Besides White Households, Hispanic households are the second most represented demographic group in assisted housing. Hispanic families make up nearly 16% of public housing units in the state, which is slightly higher than the community's representation in the state of about 12%. Public housing units with Hispanic households are geographically located in the Southwest region of the state.

The State of Idaho does not provide state funds for any type of housing.

**Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.**

In 2018, the Multifamily Assistance and Section 8 Contracts Database identified 1,297 units that have contracts expiring between 2019 and 2024. Of these units, 732 are Section 8 Public Housing units and 539 are affordable senior rentals.

While the changes in the national tax code pose some challenges in the future, LIHTC will remain a popular program and should not see any major reductions in units built in Idaho over the next 5 years.

The 2025 LIHTC application cycle yielded 17 applications totaling over \$13 million in requests for an available \$6.355 million in available resources. The approved projects will add and add approximately 260 new affordable rental units to the state of Idaho.

**Does the availability of housing units meet the needs of the population?**

Based on *Idaho County-by County Housing, Demographic Assessment* of 2024, 53.9% of the housing units in the state are affordable to renters earning the Area's Median Income. This is up from 52.6% in 2018. Meanwhile, about 79.6% of housing units are affordable to owners earning the Area's Median Income. This is up one percentage point from 2018. Affordability is set at 30% of median income, which means that about 53.9% of rental units in the state cost no more than 30% of the state's median income. To illustrate, according to ACS data, the median income for 2023 is \$98,547. On a monthly basis, 30% of this income would be \$2,463. Moreover, the gap of affordability is particularly large for families earning less than 50% of the Area Median Income.



**Describe the need for specific types of housing:**

Larger units to accommodate families are still in short supply in the state. Moreover, properties that are accessible for people with ambulatory disabilities and the elderly are also needed. Lastly, as national trends have shown, greater diversity in the housing typology to accommodate not only larger families, but also multi-generational and an array of other family unit structures should also be considered for the long-term viability of the affordable housing stock of the state. In 2023, the City of Boise published its updated Building Code. Accessory Dwelling Units (ADU) have seen a 113% increase and added 130 ADUs in the City of Boise. This gives optimism to a path other communities could follow for adding additional housing.

In addition to the need to address particular types of housing, the location and sizes of adequate parcels for housing development continued to be an issue. Such elements are particularly important in addressing the need for better access to housing for workers in urbanized areas of the state and the elderly disabled population still residing in rural areas. See Unique Appendices for additional images.

**Discussion**

Idaho's overall rural character, with varied geographic areas, and small and sometimes isolated communities, creates the backdrop to Idaho's cost-burdened homeowners and renters in all 44 counties. Overall, community consultation revealed that in most areas of the state there is a higher interest in single family dwellings over rental units, however, in the current home value market homeownership is not attainable for lower income households, and, therefore, affordable rental options are still in need.

## MA-15 Cost of Housing – 91.310(a)

### Introduction

See Unique Appendices.

### Cost of Housing

#### ALTERNATE DATA SOURCE: POLICY MAPS 2018-2022 CENSUS

	Base Year: 2012	Year: 2017	Most Recent Year: 2022	% Change 2017-2022
Median Home Value	167,100	176,800	331,600	87.6%
Median Contract Rent	720	792	1,061	74.7%

Table 25 – Cost of Housing

Data Source: 2012 Census (Base Year), 2013-2017 ACS, 2018-2022 ACS

Rent Paid	Number	%
Less than \$500	53,762	28.6%
\$500-999	109,191	58.2%
\$1,000-1,499	19,162	10.2%
\$1,500-1,999	3,277	1.8%
\$2,000 or more	2,293	1.2%
<b>Total</b>	<b>187,685</b>	<b>100.0%</b>

Table 26 - Rent Paid

Data Source: 2016-2020 ACS

### Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	12,105	No Data
50% HAMFI	46,845	25,935
80% HAMFI	118,085	93,305
100% HAMFI	No Data	145,885
<b>Total</b>	<b>177,035</b>	<b>265,125</b>

Table 27 – Housing Affordability

Data Source: 2016-2020 CHAS

## Monthly Rent

See HUD’s website for 2024 Fair Market Rents and HOME Rents Statewide.

[https://www.huduser.gov/portal/datasets/home-datasets/files/HOME\\_RentLimits\\_State\\_ID\\_2024.pdf](https://www.huduser.gov/portal/datasets/home-datasets/files/HOME_RentLimits_State_ID_2024.pdf)

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	See link above.				
High HOME Rent	See link above.				
Low HOME Rent	See link above.				

**Table 28 – Monthly Rent**

Data Source: HUD FMR and HOME Rents;

### Is there sufficient housing for households at all income levels?

Table 6 shows that there were 67,790 total households earning less than 30% AMI in the state and Table 34 shows that there were only 12,105 affordable housing units available for those at that income level. This means that there are only affordable housing units available for 17.8% of households earning less than 30% AMI. Most households at that income level were small family households, followed by households with at least one person aged 62-74. There were 70,225 total households earning 31- 50% AMI in the city and 72,780 affordable units available (for combined renter and owner households). The availability of affordable housing units, especially for those with incomes between 0-30% AMI, does not meet the demand.

### How is affordability of housing likely to change considering changes to home values and/or rents?

It is unlikely that the housing market will shift to increase the number of affordable owner-occupied or renter-occupied units to meet current demand. Further, rental units do not typically see prices decrease even when the housing market crashes.

Housing cost in general has been on a steady upward climb in recent years with incomes not keeping pace. As a result, increasingly fewer units are “affordable” to low- and moderate-income households and units with deeper subsidies are not added in large quantities or in time to meet the increasing demands.

### How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

See Unique Appendices for a list of median rents in each county compared to HOME rents/Fair Market Rents.

As discussed throughout community consultation, wages are not keeping up with the steep increases in rents in recent years. Between 2018 and 2023, median income in the State overall rose by 41%, however, the State of Idaho's minimum wage has not been updated since 2009 making it difficult for low-income wage earners to bridge the gap in meeting basic needs. Further, HOME/HTF/LIHTC are the only tools to preserve and create affordable housing options in the state. With stagnant and sometimes shrinking federal resources in a higher cost market, producing the number of units needed is challenging. As a result, the strategies needed to address the affordable housing concerns in the state need to be two part – unit creation and opportunities that assist residents in economic mobility.

### **Discussion**

None.

## MA-20 Condition of Housing – 91.310(a)

### **Introduction:**

The tables and maps in this section provide details on the condition of housing units throughout the state by looking at factors such as age, vacancy, and the prevalence of housing problems.

As defined by HUD, the 4 housing problems are:

1. a home which lacks complete or adequate kitchen facilities
2. a home which lacks complete or adequate plumbing facilities
3. a home which is overcrowded (having more than one person per room)
4. a household that is cost burdened (paying 30% or more of their income towards housing costs)

Renter-occupied units are much more likely to have at least one housing problem than owner-occupied units. This is primarily due to cost burden.

### **Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":**

*Language from Chapter 2A:*

*Standard Condition* - Prior to acquisition, a residential property meets applicable state and/or local code (for existing structures), local property/housing quality standard, and the program's property standards found in 92.251 and/or 93.301.

*Substandard Condition* - Prior to acquisition, a residential property does not meet one of the following: Applicable state and/or local code/property/housing quality standard, or Idaho State or local building code (for existing structures), or the program's applicable property standards found in 92.251 and/or 93.301.

*Substandard Condition but Suitable for Rehabilitation* - Prior to acquisition, a residential property is defined as Substandard but can be brought up to the applicable existing state and local (applicable) code for existing structures and property/housing quality standards, and the applicable property standard, at a total project cost that is less than <75% of the property's replacement cost.

## Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	88,138	21%	75,952	40%
With two selected Conditions	2,817	1%	6,414	3%
With three selected Conditions	192	0%	792	0%
With four selected Conditions	1	0%	40	0%
No selected Conditions	330,291	78%	104,487	56%
<b>Total</b>	<b>421,439</b>	<b>100%</b>	<b>187,685</b>	<b>99%</b>

Table 29 - Condition of Units

Data Source: 2016-2020 ACS

## Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	122,769	29%	41,401	22%
1980-1999	119,784	28%	58,177	31%
1950-1979	127,994	30%	63,406	34%
Before 1950	50,892	12%	24,701	13%
<b>Total</b>	<b>421,439</b>	<b>99%</b>	<b>187,685</b>	<b>100%</b>

Table 30 – Year Unit Built

Data Source: 2016-2020 CHAS

## Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	178,886	42%	88,107	47%
Housing Units build before 1980 with children present	61,090	14%	38,735	21%

Table 31 – Risk of Lead-Based Paint

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

**Vacant Units –**

See Unique Appendices for vacancy information.

	<b>Suitable for Rehabilitation</b>	<b>Not Suitable for Rehabilitation</b>	<b>Total</b>
Vacant Units			
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

**Table 32 - Vacant Units**

**Need for Owner and Rental Rehabilitation**

See Unique Appendices.

**Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards**

Housing units built prior to 1980 may contain lead-based paint in portions of the home (window and door frames, walls, ceilings, etc.) or throughout the entire home. Housing units built before 1980 have a risk of lead-based paint hazards and should be tested in accordance with HUD standards. Map II.7 (above) shows the prevalence of homes built before 1980 in the State of Idaho. According to Table 39, there were 266,993 housing units in the State of Idaho that were built prior to 1980 and are therefore at-risk of lead-based paint hazards. 42% of all owner-occupied units and 47% of all renter-occupied units fall into this category. There were 99,825 housing units built before 1980 with children present. These risks increase as the housing units age and if the rehabilitation needs are not met. Testing for lead-based paint and the repair, if needed, is another added cost for home rehabilitation.

**Discussion:**

The counties of Butte, Lewis, and Shoshone all have over 70% of their housing units being built prior to 1980 which increases the risk of lead-based paint hazards and the possibility of substandard conditions. As of 2022, nearly one half of renter households experience one or more housing conditions. The vacancy rate in Idaho is low at 1.31% - 0.96% of residential units and 4.34% of business units were vacant as of the 2nd quarter of 2024 (according to Valassis Lists).

For single-family homebuyer Down Payment Assistance, IHFA will require a Lead-Based Paint Assessment on all units prior to 1978 and 1980 in Butte, Lewis, and Shoshone county if an eligible household chooses to purchase a property in one of these counties.



## MA-25 Public and Assisted Housing – (Optional)

### **Introduction:**

Idaho Housing and Finance Association (IHFA) administers HUD's Section 8 Housing Choice Voucher program in 34 of 44 counties in Idaho through four (4) branch offices in Coeur d'Alene, Lewiston, Idaho Falls, and Twin Falls. Through the HCV program, IHFA also administers the Veterans Affairs Supportive Housing (VASH) voucher, the Mainstream Non-Elderly and Disabilities voucher, and other targeted programs. The HCV waiting lists can vary from 12 months to over 2 years. IHFA is one of a statewide network of public housing providers. IHFA does not oversee any city or county public housing authorities. These local jurisdictions each have a local official governing board, which is responsible for the Public Housing Authority and all its activities.

IHFA administers the Section 8 Housing Choice Voucher program in 34 of 44 Idaho counties and encourages housing programs statewide, as IHFA is only one in a statewide network of 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.

The Housing Authorities in the State of Idaho are:

- Boise City/Ada County Housing Authority
- Southwestern Idaho Cooperative Housing Authority
- Nampa Housing Authority
- Twin Falls Housing Authority
- Housing Authority of the City of Pocatello



**Totals Number of Units**

<b>Program Type</b>									
	<b>Certificate</b>	<b>Mod-Rehab</b>	<b>Public Housing</b>	<b>Vouchers</b>					
				<b>Total</b>	<b>Project-based</b>	<b>Tenant-based</b>	<b>Special Purpose Voucher</b>		
							<b>Veterans Affairs Supportive Housing</b>	<b>Family Unification Program</b>	<b>Disabled *</b>
# of units vouchers available			76	3,419			34	0	945
# of accessible units									
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

**Table 33 – Total Number of Units by Program Type**

**Data** PIC (PIH Information Center)

**Source:**

**Describe the supply of public housing developments:**

State response is not required.

**Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:**

State response is not required.

**Describe the Restoration and Revitalization Needs of public housing units in the jurisdiction:**

State response is not required.

**Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:**

State response is not required.

**Discussion:**

## MA-30 Homeless Facilities – 91.310(b)

### Introduction

This section summarizes shelter options and services for unhoused people in the state. The number of emergency shelter beds, transitional housing beds, and permanent supportive housing beds are provided in the chart below. These are cumulative numbers across various areas of the state. The narratives that follow describe the more qualitative aspects of resources available to those experiencing homelessness.

### Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	546	2	127	164	0
Households with Only Adults	279	76	64	262	0
Chronically Homeless Households	0	0	0	156	0
Veterans	8	0	0	237	0
Unaccompanied Youth	22	0	0	0	0

Table 34 - Facilities Targeted to Homeless Persons

**Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons.**

In addition to receiving housing assistance, homeless individuals and families have the opportunity to receive services, whether via the CoC or ESG programs, where available, or partnering agencies. Services may include case management, childcare assistance, education and career counseling, employment assistance, job training, health care, mental health services, substance or alcohol abuse treatment, transportation, and utility assistance, among other supportive services. The level of services and length of care or participation varies greatly. To the extent that program regulations allow, service providers attempt to offer as much support as possible for as long as needed. Apart from projects and agencies operating CoC and ESG programs, the Department of Health and Welfare's Behavioral Health Division, the Substance Abuse and Mental Health Services Administration, and faith-based welfare programs, along with other federal and/or state agencies, are the primary agencies offering services which target homeless individuals and families.

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

According to homeless individual declarations from past Point in Time count surveys and the expertise of highly involved service providers, the most commonly reported causes of homelessness are identified as: 1) unemployment; 2) inability to find affordable housing; 3) divorce/family separation; 4) eviction; 5) substance abuse; and 6) lack of education or job skills. Inability to find affordable housing has quickly risen in the top concern for many as across the state stakeholder report more working people experiencing homelessness.

One prevalent commonality among those experiencing homelessness is the existence of a disabling condition. With this understanding, the BoS CoC and staff administering CoC and ESG programs attempt to seek out services and resources linked to the causes of homelessness listed above, as these most certainly become barriers to later locating and securing housing. To that end, services must also include resources that aid those experiencing homelessness in extinguishing barriers that may have arisen as a result of becoming homeless, such as poor credit, criminal history, poor finances, etc. These barriers related to background were a frequent topic of concern throughout community consultation.

Additional efforts will be made to link healthcare and housing providers and promote affordable housing projects which encourage access to supportive services for homeless families and individuals. IHFA's efforts in researching homelessness solutions, the receipt of HUD technical assistance to form partnerships between housing and healthcare providers and proactively seek systems that successfully pair vulnerable populations to appropriate services will all generate a positive impact on Idaho's homeless population.

## MA-35 Special Needs Facilities and Services – 91.310(c)

### **Introduction**

Many Idaho residents face homelessness, or the risk of becoming homeless, each year. As the main recipient of homelessness assistance funding, Idaho Housing and Finance Association is the recipient of the majority of homelessness assistance funds. IHFA administers the CoC and ESG programs to meet the special needs and services for communities in the state. While also maintaining Idaho's Homeless Management Information System, HOME/HTF, Low Income Housing Tax Credit allocations, and a large portion of the total Section 8 Housing Choice Vouchers available in the state, IHFA is uniquely positioned to pair resources and form partnerships with others to promote a positive impact upon the living situation of homeless persons in Idaho and meet the needs of different communities in the state.

**To the extent information is available, describe the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.**

See Unique Appendices.

**Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.**

One definition of homelessness includes those individuals that are exiting a facility or institution who were homeless prior to entry, and when exiting, do so without services made available through their placement into society. Resources to house these individuals, and potentially their families, are used to house them rapidly to minimize their potential to become, or time experiencing, homelessness. Services necessary to eliminate barriers to permanent housing and gainful employment are made available. Encouraging housing providers to adopt low-barrier eligibility screening, and promoting this system-wide within the CoC, will help to avoid homelessness or minimize the length of time individuals and families spend in homelessness. "The Facilities and Services For Non-Homeless Persons" table includes resources that those exiting mental or physical health institutions can access supportive housing or appropriate services.

**Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

The Special Needs Housing Programs administered by IHFA predominately serve homeless persons. In many cases, these HUD program requirements do not allow funds to be used for non-



homeless individuals. However, ESG funds can be used for homelessness prevention and rapid re-housing activities. Although an applicant must meet one of several HUD homeless definitions, one of those is being imminently at risk of homelessness (Category 2 of HUD's homeless definition) which means they would still be housed when assistance is provided. Those accessing ESG homelessness prevention and rapid re-housing assistance may receive short to medium term tenant-based rental assistance and/or housing relocation and stabilization services, including financial counseling, housing locator assistance, and housing stability case management.

**For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

N/A

## MA-40 Barriers to Affordable Housing – 91.310(d)

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

See Unique Appendices.

## MA-45 Non-Housing Community Development Assets -91.315(f)

### Introduction

There are many factors within a community that can impact housing supply and demand. The economic development of the community can play a major role in what type of home a household needs and what they can afford. The presence, or lack thereof, of specific industries can also decrease or increase the number of residents in a community. Throughout this section a variety of economic indicators will be described and analyzed. This will include business activity, labor force participation, travel time, education, and veterans.

### Economic Development Market Analysis

#### Business Activity

See Unique Appendices.

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction					
Arts, Entertainment, Accommodations					
Construction					
Education and Health Care Services					
Finance, Insurance, and Real Estate					
Information					
Manufacturing					
Other Services					

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Professional, Scientific, Management Services					
Public Administration					
Retail Trade					
Transportation & Warehousing					
Wholesale Trade					
Grand Total					

**Table 35- Business Activity**

**Data Source:** 2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs)

## Labor Force

Total Population in the Civilian Labor Force	471,661
Civilian Employed Population 16 years and over	451,640
Unemployment Rate	4.10
Unemployment Rate for Ages 16-24	13.48
Unemployment Rate for Ages 25-65	2.16

**Table 36 - Labor Force**

Data Source: 2016-2020 ACS

Occupations by Sector	Number of People
Management, business and financial	
Farming, fisheries and forestry occupations	
Service	
Sales and office	
Construction, extraction, maintenance and repair	
Production, transportation and material moving	

**Table 37 – Occupations by Sector**

Data Source: 2016-2020 ACS

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	294,975	72%
30-59 Minutes	90,836	22%
60 or More Minutes	24,359	6%
<b>Total</b>	<b>410,170</b>	<b>100%</b>

**Table 38 - Travel Time**

Data Source: 2016-2020 ACS

**Education:**

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate			
High school graduate (includes equivalency)			
Some college or Associate’s degree			
Bachelor’s degree or higher			

**Table 39 - Educational Attainment by Employment Status**

Data Source: 2016-2020 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade					
9th to 12th grade, no diploma					
High school graduate, GED, or alternative					
Some college, no degree					
Associate’s degree					
Bachelor’s degree					
Graduate or professional degree					

**Table 40 - Educational Attainment by Age**

Data Source: 2016-2020 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	
High school graduate (includes equivalency)	
Some college or Associate’s degree	
Bachelor’s degree	
Graduate or professional degree	

**Table 41 – Median Earnings in the Past 12 Months**

Data Source: 2016-2020 ACS

**Based on the Business Activity table above, what are the major employment sectors within the state?**

The major employment sectors in Idaho for the period 2018-2022 based on the number of people employed and their percentage of total employment are:

1. **Health Care and Social Assistance** – 116,763 people employed (13.37%)
2. **Retail Trade** - 103,370 people employed (11.83%)
3. **Educational Services** - 77,271 people employed (8.85%)
4. **Manufacturing** - 83,456 people employed (9.55%)
5. **Construction** - 79,176 people employed (9.06%)

**Describe the workforce and infrastructure needs of business in the state.**

According to BLS data, the unemployment rate in Idaho as of December 2024 was 2.3%, however, stakeholders indicated that while jobs are available wages are not sufficient to meet the cost of living, especially in relation to housing costs. The Unique Appendices includes a list of unemployment rates by County as of December 2024.



**Describe any major changes that may have an economic impact, such as planned public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

Idaho has a number of strategic public and private sector initiatives aimed at fostering job creation and business growth. Key development include:

1. Workforce Development Programs: The Idaho Workforce Development Council offers various grants to address workforce challenges and skills gaps. Grant opportunities include:
  - a. Industry sector grants: aim to involve employers in creating innovative training solutions that tackle Idaho’s workforce challenges and close skills gaps.
  - b. Innovation grants: fund projects that address local workforce development needs.
  - c. Employer grants: available to Idaho businesses that are expanding their workforce and/or retraining current employees with the skills needed to support specific economic opportunities or industrial growth initiatives.
  - d. Registered Apprenticeship Incentive: intended to help offset the unique costs associated with implementing a Registered Apprenticeship training program.
  - e. Preceptor Incentive: intended to encourage medical providers across Idaho to mentor students, helping to expand the state’s health care workforce.
  - f. Outreach grants: The Workforce Development Council’s Outreach Committee reviews and funds proposals that promote public awareness of career education and workforce training opportunities, including existing programs and services not supported by the training fund.
  - g. Childcare Expansion grants: managed by the Workforce Development Council, these grants aim to increase access to child care for working families by supporting employers and child care providers who are building new on-site or near-site facilities or expanding existing ones. Recognizing child care as a critical support for workforce participation—especially in light of pandemic-related declines in Idaho’s labor force—these grants offer funding for infrastructure and operations in areas where child care demand significantly exceeds supply.
2. Workforce Innovation and Opportunity Act (WIOA): This federally funded program aims to increase employment, retention, earnings, and occupational skills among Idaho's workforce, focusing on adults, dislocated workers, and youth.
3. Aerospace Materials Manufacturing Tech Hub: In January 2025, the U.S. Department of Commerce awarded approximately \$48 million to strengthen the aerospace materials manufacturing industry in Washington and Idaho. This initiative is expected to spur job

growth, attract private investment, and position the region as a global leader in aerospace materials manufacturing.

4. Statewide Rural Economic Development Strategy: The Idaho Department of Commerce is implementing a strategy focused on sector-based development, job growth, workforce development, entrepreneurship, and placemaking, particularly in rural areas. This approach aims to diversify the economy and create sustainable employment opportunities across the state.

### **How do the skills and education of the current workforce correspond to employment opportunities in the state?**

With the geographical size and somewhat three distinct regions within Idaho (north, central, eastern) there is no one private sector investment(s) that is likely to have a significant effect on job and business growth opportunities statewide. Overall, the most frequently cited concern during community consultation discussed the need for increased wages that keep pace with rising costs, particularly housing costs. Few communities reported concerns with unemployment, but with minimum wage set at \$7.25 per hour, low wage workers will continue to meet basic needs. As of 2023, Idaho's median average wage was \$21.27, which was a 10.4% increase from 2022. Skills training to make residents more marketable for higher paying positions was noted as a need throughout community consultation.

The Department of Labor's long-term industry projections for 2023-2032 indicate that several industries are expected to experience particularly fast growth. Skills training in these areas could result in more opportunities for residents with respect to economic mobility.

- Health care and social assistance are anticipated to account for 20% of new jobs (approximately 25,000). Idaho's retiree population is growing rapidly, with the 65 and older demographic expected to grow by 31% in the coming decade. Because Americans over the age of 65 consume significantly more health care than those younger than 65, this growing retiree demographic is expected to fuel a continued expansion of Idaho's health care industry. By 2032, total health care employment in Idaho is expected to reach near 140,000, accounting for some 14% of all employment in the state.
- Construction continues to grow in Idaho, driven by the state's demand for new housing to accommodate rapid population growth, as well as infrastructure and civil engineering work required to serve Idaho's growing communities. With Idaho's population forecasted to grow by nearly 300,000 people by 2032, construction is expected to create more than 16,000 new jobs. The trades and transportation fields are also expected to grow rapidly, adding 19,000 jobs.

Idaho state government's reluctant to expand or develop public financing tools, (such as local option tax, expand impact fees allowance, fund a state housing trust, increase fuel taxes) especially during a time of high economic and population growth, will start to hamper quality growth in the future, as infrastructure, educational systems, and public services won't have the funding to adequately serve the future needs. Although local government will collect more in terms of fees and taxes, due to the rapid pace of the growth, they will struggle with the price of growth.

**Describe current workforce training initiatives supported by the state. Describe how these efforts will support the state's Consolidated Plan.**

1. The Idaho Workforce Development Council (WDC) leads several statewide initiatives aimed at closing skill gaps and preparing Idaho's workforce for careers in high-demand sectors. These include: Workforce Training Fund (WTF): supports businesses and community colleges to develop customized training for new and existing workers. The WTF priorities industry sectors like manufacturing, healthcare, construction, and technology.
2. Industry Sector Grants: Promotes employer-led partnerships to design and deliver industry-specific training. They encourage collaboration between employers, educational institutions, and workforce agencies.
3. Apprenticeship Idaho: expands registered apprenticeships in non-traditional fields like IT, healthcare, and finance.
4. Childcare Expansion Grants: provides funding for projects that increase access to affordable childcare, especially for low and moderate income households.
5. Work-Based Learning (WBL) Programs: connects students and those searching for jobs with internships, job shadow opportunities, and pre-apprenticeships.

**Describe any other state efforts to support economic growth.**

See above.

## **Discussion**

None.

## MA-50 Needs and Market Analysis Discussion

**Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")**

**Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

State Grantees response is not required.

**What are the characteristics of the market in these areas/neighborhoods?**

State Grantees response is not required.

**Are there any community assets in these areas/neighborhoods?**

State Grantees response is not required.

**Are there other strategic opportunities in any of these areas?**

State Grantees response is not required.

## MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

### **Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

Internet is an essential communications and information platform that allows users to take advantage of the increased interconnectedness of business, education, commerce, and day to day utility. Reliable access to the internet is becoming a necessity to thrive in the modern economic environment. Communities that lack broadband access struggle to keep pace with the country. According to the Idaho Broadband Strategic Plan (2022-2027), determining the number of unserved households in Idaho varies widely depending on the source cited. The FCC estimates that nearly 18,000 households lack access to fixed terrestrial broadband service at 25/3Mbps. Conversely, Broadband Now and the US Census estimate the number of unserved households is closer to 100,000. Connecting Idahoans who are underserved, or lack access to 100/20Mbps, to high-speed broadband, is an even larger task, estimated by the FCC to be 150,000 households.

Locations without broadband access impedes its population's ability to take advantage of the educational and entrepreneurial opportunities available online. This is particularly problematic for LMI areas where economic opportunities are often already lacking. Studies suggest a strong correlation between increased high-speed internet access and increased education and employment opportunities, especially in small cities and rural areas.

In 2020, the state created the Office of Broadband within the Department of Commerce to help communities improve broadband infrastructure in support of improving distance learning, remote work, access to telehealth, and ensuring communities have reliable internet. In 2021, the Idaho Broadband Advisory Board was created by the Idaho Legislature in 2021, via the passage of [House Bill 127](#). The board established the Idaho Broadband Strategic Plan, which supports the board's vision that Idahoans have access to affordable and reliable broadband infrastructure. The board is responsible for structuring, prioritizing and dispersing state and federal grants, which will enhance connectivity across the state and address equal access to economic development, telework, public safety, telehealth and education. Pursuant to the Broadband Strategic Plan, by 2027 Idaho will strive to serve 100% of Idaho's businesses and homes with access to high-speed broadband that provides minimum download speeds of at least 100 megabits per second and minimum upload speeds of at least 20 megabits per second. Part of this strategy includes implementing grant programs that focus on unserved and underserved communities.

**Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.**

Once broadband access has been obtained, it is important to ensure there is competition among service providers. According to the Federal Communications Commission (FCC), the State of Idaho is home to 67 terrestrial broadband providers, however, connectivity is uneven for the residents of Idaho. Any resource that has a de facto monopoly on an area may not be incentivized to provide standard and consistent services so it will be important to ensure there is competition among providers as broadband services reaches all communities across the state.

## MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

### **Describe the jurisdiction's increased natural hazard risks associated with climate change.**

The Idaho State Hazard Mitigation Plan (SHMP) (2023) focuses on hazards and risks that affect local jurisdictions, including impacts from risks on the built environment; community lifelines; future conditions; population; land use; and socially vulnerable communities. The SHMP also assesses the effects of climate change on hazards, their potential impacts, and strategies for addressing them.

The SHMP assessed that Idaho has experienced thousands of hazard events, resulting in casualties, millions of dollars in losses, 32 federal major disaster (DR) declarations, three federal emergency (EM) declarations, and 19 federal fire management assistance (FM) declarations. Federal disaster declarations in Idaho since 1956 can be categorized as follows:

- Floods and wildfires were components of 22 declarations each (44%)
- Severe storms were a component of 10 declarations (21%)
- Landslides and mudslides were a component of four declarations (8%)
- Severe weather was a component of 2 declarations (4%)
- Earthquake, drought, dam collapse, and evaluation were components of one declaration each (2%)

Many of the declarations were classified as a combination of incident types; therefore, these percentages may include the same event in multiple declaration types.

Climate change will continue to exacerbate the frequency, scale, and intensity of hazards across Idaho. Many communities have experienced substantial damage from climate-related hazards. Climate patterns are shifting, resulting in more extreme and variable weather conditions across the state, with more extreme precipitation events, declining snowpack, more frequent and severe heat waves, and drought conditions. Climate change has impacted Idaho's natural areas and forests, increasing the frequency of wildfires.

### **Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.**

Low and moderate-income residents are at particular risk due to having less available resources to combat the impacts of natural disasters. Adapting to the changing climate will require an approach to hazard mitigation that prioritizes long-term community resilience practices. Such



practices aim to reduce harm for those who experience greater risk and burden of harm due to historical and current marginalization and under-investment, thus resulting in greater resilience across the whole community. The hazard mitigation actions necessary to achieve this goal constantly evolve as conditions change, and the participation of all levels of government, non-profit organizations, the private sector, and the public enhances all actions. It is important to ensure that hazard mitigation actions do not contribute to greenhouse gas emissions, which exacerbate climate change impacts.

Looking at the top three hazards, wildfires, floods, and severe storms, which historically have caused the most disasters in the state, the vulnerability to these risks of housing occupied by low- and moderate-income households as described in the SHMP follows:

- **Wildfires:** Low-income communities, migrant populations, populations whose primary language is not English, indigenous populations, communities of older adults, and those with respiratory and other health concerns are all especially vulnerable to wildfires. Members of immigrant communities may be concerned about impacts to their immigration status and do not seek help. When a wildfire impacts an area with high rents where multiple families live in one structure, it may be difficult for those not listed on the lease to prove that they were affected by the fire; this could result in a lack of access to services. Additionally, fires quickly increase housing prices and rent prices, further displacing people already affected by the fire. Homelessness can increase.
- **Floods:** Socially vulnerable populations are most susceptible based on many factors, including their physical and financial ability to react or respond during a hazard and the location and construction quality of their housing. Economically disadvantaged populations are likely to evaluate their risk and make decisions based on the major economic impact on their family and may not have funds to evacuate. The aftermath of flooding events presents numerous threats to public health and safety, including unsafe food, contaminated drinking and washing water and poor sanitation, mosquitoes and animals, mold and mildew, carbon monoxide poisoning, and mental stress and fatigue.
- **Severe Storms:** Power outages from severe weather can be life-threatening to those dependent on electricity for life support and are a significant concern. These populations face isolation and exposure during severe weather events and could suffer more secondary effects of the hazard. Vulnerable populations, such as the elderly, low-income and linguistically isolated populations, are most susceptible to severe weather. This vulnerability is based on several factors, including their physical and financial ability to react or respond during a hazard and the location and construction quality of their housing. Other risk factors include that power outages can be life-threatening to people dependent on electricity for life support. Because these vulnerable populations face

various forms of isolation, they are more at risk for secondary effects from severe weather hazards.

# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

#### State of Idaho- HOME and HTF Programs

The Strategic Plan identifies Idaho's affordable housing goals and community development needs, as well as the strategies and resources used to help address the priority needs as identified herein. Idaho Housing and Finance Association (IHFA) and Idaho Department of Commerce (IDC) conducted statewide affordable housing and community development surveys, inviting stakeholders and the public to help identify needs at the local level. In addition, IHFA commissioned a *2024 Idaho County-Level Housing & Demographic Data Report*. This report provides information regarding housing affordability, income and income levels, types of housing available, and wage gaps in Idaho's forty-four (44) counties, as well as a statewide overview. IHFA used this report to help inform the affordable housing needs assessment, market analysis, goals and strategies.

The State of Idaho has four Metropolitan Statistical Areas (MSA) that are contained entirely within the State's boundaries. (There are additional MSA's that have shared boundaries with the states of Washington and Utah). To qualify as an urban area under census guidelines, an area must encompass at least 2,000 housing units or have a population of at least 5,000. Just under 40 of the State's 234 cities have populations exceeding 5,000 people. Areas under these thresholds are considered rural.

The geographical makeup includes two major mountain ranges, five major river systems, forty-four (44) counties, all of which create a unique set of barriers and challenges to the delivery of goods and services. It also creates a challenge when prioritizing affordable housing and homeless needs. The City of Boise is the only HOME Entitlement Community in the state, receiving its own allocation of HOME funds. There are no Housing Trust Fund (HTF) Entitlement Communities. IHFA administers both programs for the non-entitlement areas of Idaho.

Each five years, IHFA and IDC create a Fair Housing Assessment for Idaho's non-entitlement areas. The 2022-2027 assessment is available online. This plan includes the most current assessment of Idaho's barriers to affordable housing and community development needs, as well as current strategies and anticipated outcomes.

Additional information regarding lead-based paint hazard reduction programs, program monitoring, institutional delivery structure, public housing under IHFA's jurisdiction in Idaho's non-entitlement areas, geographic priorities, homelessness strategies, and IHFA and IDC's anti-poverty strategies are described in this plan.

## **State of Idaho-CDBG Program**

Idaho Department of Commerce will not target Community Development Block Grant (CDBG) funds geographically, but will ensure at least 70% of the CDBG funds will benefit low-to-moderate income persons in whatever eligible geographic area they reside.

The needs for the CDBG program were established by a local government survey, public hearing, and review of prior demand. The top needs indicated are broad and include streets, sewers, public parks, community centers, and public infrastructure support for job growth.

The CDBG delivery structure consists of threshold factors; application format, submission dates, scoring criteria, and the five funding set-asides may have some slight changes made to them but they will not be significant. This constant, keeps the process familiar and recognizable for local governments. This is helpful since almost all local governments do not regularly submit for CDBG funds and may not have the resources to learn of a new process or procedures. Consistency of delivery structure has kept the CDBG funds accessible.

Whereas, Idaho local governments lack the tools necessary to generate revenue (such as a local option tax, limits on tax increases, and debt limitations) for improvements to public infrastructure and facilities they look to CDBG to help fill financial gaps in meeting the needs of their citizens.

## SP-10 Geographic Priorities – 91.315(a)(1)

### **Geographic Area**

#### **Table 42 - Geographic Priority Areas**

##### **General Allocation Priorities**

Describe the basis for allocating investments geographically within the jurisdiction.

##### **HOME and HTF**

Idaho Housing and Finance Association (IHFA) does not award Home Investment Partnerships Program (HOME) or Housing Trust Fund (HTF) funds based on geographic distribution model or locally targeted areas. IHFA awards these funds statewide following a published Notice of Funding Announcement (NOFA) or Request for Proposal (RFP) process that includes minimum threshold and application scoring. This allows IHFA to award federal affordable housing resources to eligible recipients throughout Idaho who have illustrated a commitment to not only creating affordable housing that serves low, very-low and extremely-low-income households, but also the ability to maintain it the long term. This also provides IHFA with maximum flexibility to allow communities in Idaho to address their own unique affordable housing priorities and needs. Each local unit of government, receiving HUD entitlement funds, in which the rental housing is located, must have a documented commitment to affirmatively furthering fair housing. If the community does not receive HUD entitlement funds, the developer/owner can adopt actions in conformance with IHFA's commitment to affirmatively further fair housing.

##### **CDBG**

Idaho Community Development Block Grant Program (CDBG) does not award funds based on geographic distribution. The State CDBG program benefits low to moderate income areas throughout the State of Idaho as required to meet HUD's national objective.

##### **ESG**

Emergency Solutions Grant (ESG) funds are distributed across the seven regions of Idaho through a competitive application process, as described in AP-30. Final awards are based on a total application score, of which 20% is based on regional need. See Unique Appendices for a map of the regions.

The ESG regional need formula is calculated using four, equally weighted factors:

- Percentage of Idaho population

- Median rent-to-income ratio
- Percentage of population at or below poverty level
- Number of individuals experiencing homelessness

The usage of this formula currently reveals the following need break-down (minus IHFA administrative funds):

Region 1: 16%

Region 2: 10%

Region 3: 18%

Region 4: 3%

Region 5: 15%

Region 6: 3%

Region 7: 20%

Because there are other factors considered during the award allocation, there is a slight (up to 8%) variance between the regional need and regional allocation.



**HOME, HTF, and ESG Regions**

## SP-25 Priority Needs – 91.315(a)(2)

### Priority Needs

Table 43 – Priority Needs Summary

<b>1</b>	<b>Priority Need Name</b>	Create and Preserve Affordable Rental Housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Elderly Families with Children Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Provide Decent Affordable Housing
	<b>Description</b>	The 2024 Idaho Housing Needs Assessment Survey and community consultation identified affordable rental housing for households with incomes at or below 80% AMI as a priority, with rental housing for households at or below 30% AMI the highest unmet need. It's estimated that only 53.9% of units are affordable to renters across all income levels with only 8.3% affordable to renters in the 0-30% AMI range, 15.8% affordable to renters in the 30-50% AMI range, and 45% affordable to renters in the 51-80% AMI range. The 2024 Idaho County-by-County Housing & Demographic data analysis revealed that incomes have not kept pace with increases in rent in a third of Idaho's counties.



	<p><b>Basis for Relative Priority</b></p>	<p>The HOME program includes a Program Rule and a Project Rule. These rules restrict the income levels of tenants occupying HOME-assisted units at initial occupancy as well as throughout the HOME period of affordability. The Program Rule require 90% of tenants in HOME-assisted housing to have incomes ≤60% AMI (Program Rule) with an additional 20% of the units housing tenants with household income at or below 50% AMI the first time the HOME-assisted unit is occupied (Project Rule).</p> <p>Housing Trust Fund:</p> <p>The 2024 Idaho Housing Needs Assessment Survey and the 2024 Idaho County-by-County Housing &amp; Demographic data analysis have identified affordable rental housing for households at or below 30% AMI the highest unmet housing need in Idaho. Within the 0-30% AMI income level, elderly and disabled households were identified as special housing needs populations with significant needs as many live on fixed incomes that do not keep pace with rising housing costs.</p> <p>Therefore, IHFA has determined when HTF funds are used to help create and preserve permanent rental housing for extremely-low income households [§93.200], project owners may designate a preference for elderly (all members of the household must be at least 62 years of age), and/or disabled households, in HTF- assisted units. Any tenant preference must not violate the non-discrimination laws and requirements identified at §93.350. Additionally, HTF-funded units must not limit or give preference to students [Limited Beneficiaries or Preferences- § 91.320(k)(5)(vii)].</p> <p>Goals addressing this priority need will be funded by HOME and HTF.</p>
<p><b>2</b></p>	<p><b>Priority Need Name</b></p>	<p>Create Affordable Homeownership Opportunities</p>
	<p><b>Priority Level</b></p>	<p>High</p>
	<p><b>Population</b></p>	<p>Low</p>
	<p><b>Geographic Areas Affected</b></p>	
	<p><b>Associated Goals</b></p>	<p>Provide Decent Affordable Housing</p>

	<b>Description</b>	<p>Homebuyer Properties Activities</p> <ul style="list-style-type: none"> <li>Acquisition and Rehabilitation New Construction</li> </ul> <p>The HOME program serves households with income not to exceed 80% AMI. Low-Income is defined as household income between 50-80%. Homeownership opportunities using the HOME Program are often available to low-income households because they are able to qualify for a primary mortgage. The HOME Homebuyer Properties activity provides HOME-assistance to help fill the gap (up to a maximum amount) between the primary loan and the sales price. IHFA's HOME program requires the household to first qualify for a primary loan with a product that can be purchased by IHFA through an IHFA-approved lender. Acceptable loan products are Conventional, VA, USDA-RD and FHA.</p>
	<b>Basis for Relative Priority</b>	<p>Basis for this priority is found in the 2024 Housing Needs Survey, input from the public (including units of local government, local regional and state level stakeholders), and the 2024 Idaho County-by-County Housing &amp; Demographic data. Across the state, income increased 41% between 2018 and 2023, while home values increased 96%. This significant disparity between increases in home value compared to income was found in nearly every county with some disparities even greater than the state's overall.</p> <p>Goals addressing this priority need will be funded by HOME and HTF.</p>
3	<b>Priority Need Name</b>	Public Facilities
	<b>Priority Level</b>	High

<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Victims of Domestic Violence Elderly Frail Elderly Persons with Developmental Disabilities Victims of Domestic Violence Non-housing Community Development
<b>Geographic Areas Affected</b>	
<b>Associated Goals</b>	Public Facilities/Infrastructure-Compliance Public Facilities/Infrastructure-New Construction Public Facilities/Infrastructure-Rehabilitation
<b>Description</b>	Public facilities include health facilities, fire and EMT stations, fire trucks, senior centers, community centers, homeless shelters, childcare centers, parks, youth centers, domestic shelters, and non-residential historic buildings.
<b>Basis for Relative Priority</b>	The basis has been determined by four sources: <ul style="list-style-type: none"> <li>• The local government needs survey conducted by Commerce.</li> <li>• The American Society of Civil Engineers, 2021 Report Card for Idaho’s infrastructure to further assess non-housing community development needs.</li> <li>• Public participation. No comments were received for the pre-draft consolidated plan. Comments for the final draft are located in the Unique Appendices.</li> <li>• Prior five years of CDBG application submissions.</li> </ul> Goals addressing this priority need will be funded by CDBG.

4	<b>Priority Need Name</b>	Public Infrastructure
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Non-housing Community Development
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Public Facilities/Infrastructure-Compliance Public Facilities/Infrastructure-New Construction Public Facilities/Infrastructure-Rehabilitation
	<b>Description</b>	Public Infrastructure - water systems, sewer systems, streets, sidewalks, solid waste disposal, surface and storm water drainage, public parking facilities.
	<b>Basis for Relative Priority</b>	<p>The basis has been determined by four sources:</p> <ul style="list-style-type: none"> <li>• The local government needs survey conducted by Commerce.</li> <li>• The American Society of Civil Engineers, 2021 Report Card for Idaho’s infrastructure to further assess non-housing community development needs.</li> <li>• Public participation. No comments were received for the pre-draft consolidated plan. Comments for the final draft are located Unique Appendices.</li> <li>• Prior five years of CDBG application submissions.</li> </ul> <p>Goals addressing this priority need will be funded by CDBG.</p>
5	<b>Priority Need Name</b>	Housing related activities
	<b>Priority Level</b>	Low

	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Rural Chronic Homelessness
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Provide Suitable Living Environment Public Facilities/Infrastructure-Compliance Public Facilities/Infrastructure-New Construction Public Facilities/Infrastructure-Rehabilitation
	<b>Description</b>	Housing related activities - water/sewer hookups to low to moderate income persons, public infrastructure expansion to affordable housing, acquisition of property to construct affordable housing, acquisition or rehabilitation of existing affordable housing, subordinated loans for homeownership.
	<b>Basis for Relative Priority</b>	The basis has been determined by four sources: <ul style="list-style-type: none"> <li>• The local government needs survey conducted by Commerce.</li> <li>• The American Society of Civil Engineers, 2021 Report Card for Idaho’s infrastructure to further assess non-housing community development needs.</li> <li>• Public participation. No comments were received for the pre-draft consolidated plan.</li> <li>• Prior five years of CDBG application submissions.</li> </ul> Goals addressing this priority need will be funded by CDBG.
6	<b>Priority Need Name</b>	Economic Development
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Rural Non-housing Community Development

	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Economic Development-Downtown Revitalization Economic Development-Job Creation
	<b>Description</b>	Economic Development - job creation and downtown revitalization (expansion or extension of public infrastructure that serves a business that will create new jobs). Providing business loans.
	<b>Basis for Relative Priority</b>	<p>The basis has been determined by four sources:</p> <ul style="list-style-type: none"> <li>• The local government needs survey conducted by Commerce.</li> <li>• The American Society of Civil Engineers, 2021 Report Card for Idaho’s infrastructure to further assess non-housing community development needs.</li> <li>• Public participation. No comments were received for the pre-draft consolidated plan. Comments for the final draft are located in the Unique Appendices.</li> <li>• Prior five years of CDBG application submissions.</li> </ul> <p>Goals addressing this priority need will be funded by CDBG.</p>
7	<b>Priority Need Name</b>	Cleanup of blighted properties
	<b>Priority Level</b>	Low
	<b>Population</b>	Non-housing Community Development
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Economic Development-Downtown Revitalization Public Facilities/Infrastructure-Rehabilitation
	<b>Description</b>	Clean-up of contaminated public property and sites; and clearance and demolition of blighted properties

	<b>Basis for Relative Priority</b>	<p>The basis has been determined by four sources:</p> <ul style="list-style-type: none"> <li>• The local government needs survey conducted by Commerce.</li> <li>• The American Society of Civil Engineers, 2021 Report Card for Idaho’s infrastructure to further assess non-housing community development needs.</li> <li>• Public participation. No comments were received for the pre-draft consolidated plan. Comments for the final draft are located in the Unique Appendices.</li> <li>• Prior five years of CDBG application submissions.</li> </ul> <p>Goals addressing this priority need will be funded by CDBG.</p>
<b>8</b>	<b>Priority Need Name</b>	Planning Studies
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Non-housing Community Development
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Public Facilities/Infrastructure-Compliance Public Facilities/Infrastructure-New Construction Public Facilities/Infrastructure-Rehabilitation
	<b>Description</b>	Comprehensive plan, facility plan or preliminary engineering, environmental studies, economic development and energy conservation.
	<b>Basis for Relative Priority</b>	<p>The basis has been determined by the local government needs survey that was conducted by Commerce.</p> <p>No comments were received for the pre-draft consolidated plan.</p> <p>Comments for the final draft are located in the Unique Appendices.</p> <p>Goals addressing this priority need will be funded by CDBG.</p>
<b>9</b>	<b>Priority Need Name</b>	Homeless Shelter Operations, Homelessness Prevention, and Rapid Rehousing

	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Provide Suitable Living Environment
	<b>Description</b>	Shelter operations and supportive services are offered through shelters in all seven regions in Idaho. Rapid Re-housing and Homelessness Prevention are made available through homeless services providers in all seven regions in Idaho.
	<b>Basis for Relative Priority</b>	2024 Statewide Housing Needs Homeless Needs Assessment and community consultation demonstrates a need to direct resources towards efforts which offer opportunities that assist homeless individuals and families in avoiding homelessness, reducing time spent homeless, and a reprieve from living in environments not meant for human habitation.  Goals addressing this priority need will be funded by ESG.
<b>10</b>	<b>Priority Need Name</b>	Preserve Affordable Homeownership Opportunities
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Very Low Low
	<b>Geographic Areas Affected</b>	Statewide



	<b>Associated Goals</b>	Provide Decent Affordable Housing
	<b>Description</b>	Assist 10 eligible households with necessary repairs to maintain their housing unit. IHFA will solicit through a competitive RFP, qualified non-profits who will administer the program in their area. The first year, it is anticipated 10 households will be assisted.
	<b>Basis for Relative Priority</b>	Idaho’s housing stock, particularly in rural areas is older and is often “naturally occurring affordable housing.” Minimally, once a month, IHFA will receive inquiries from citizens who need financial assistance to complete repairs. This activity will help to prioritize maintain a housing unit, with a 0% interest loan (due on sale/transfer) and bringing it up to meet required property standards. Goals addressing this priority need will be funded by HOME.

**Narrative (Optional)**

## SP-30 Influence of Market Conditions – 91.315(b)

### Influence of Market Conditions

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
Tenant Based Rental Assistance (TBRA)	The lack of affordable rental housing and increasing rental costs continues to impact lower income households in having access to safe, decent, and affordable housing. Across the state, only 53.9% of rental units are affordable to renters across income bands. The number of units affordable to a given income band decreases as incomes decrease.
TBRA for Non-Homeless Special Needs	The lack of affordable rental housing and increasing rental costs continues to impact lower income households in having access to safe, decent, and affordable housing. Across the state, only 53.9% of rental units are affordable to renters across income bands. The number of units affordable to a given income band decreases as incomes decrease.
New Unit Production	The lack of affordable rental housing remains Idaho’s high housing need, especially for households with annual incomes at or below 30% AMI. This need has been exacerbated by Idaho's aging population, increasing in-migration, and growing number of cost-burdened renters and owners. This housing need is evident in all Idaho counties and create a priority need for more affordable rental and homebuyer units. Across the state, only 53.9% of rental units are affordable to renters across income bands. The number of units affordable to a given income band decreases as incomes decrease.

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
Rehabilitation	<p>Based on IHFA's current Needs Assessment about 42% of Idaho's housing stock was built prior to 1980.</p> <p>There are currently many older existing rental properties in Idaho's smaller or rural communities in Idaho that are approaching the end of their affordability period and could be sold as market rate rental housing. The <a href="#">National Housing Preservation Database (NHPD)</a> reports that 1,875 assisted housing units are set to expire I the next five years. Rehabilitating this older housing will help it to continue to meet code and property standards, and require it to remain affordable for years to come.</p> <p>When single-family structures are purchased and rehabilitated with HOME funds, they provide safe decent housing a community's low-income households that want to own their own home. Rehabilitating existing single-family homebuyer units help to create a continuum of housing choices in Idaho's communities. <a href="#">This will be achieved by partnering with qualified non-profits who can help those in their communities of service.</a></p>
Acquisition, including preservation	<p>As Idaho's affordable housing rental properties age, there is increased demand for federal funds to help acquire these properties and keep them in Idaho's affordable housing portfolio. Rental properties must meet the HOME/HTF definition of Standard Condition or Substandard but suitable for Rehabilitation at the time ownership is transferred (defined as meeting local and/or Idaho building or residential code, local code/property standards/zoning/ordinances and HOME and/or HTF property standards).</p>

**Table 44 – Influence of Market Conditions**

## SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

### Introduction

Idaho Housing and Finance Association (IHFA) is the Allocating Agency for Idaho's Low-Income Tax Credit program (LIHTC), the designated administrator for Idaho's HOME Investment Partnership Program (HOME), National Housing Trust Fund Program (HFT), Neighborhood Stabilization Program, and the Emergency Solutions Grant Program (ESG). The Idaho Department of Commerce is the designated Administrator of Idaho's Community Development Block Grant Program (CDBG).

The Anticipated Resources Matrix below outlines each of these funds, expected amounts available in year one (1) and a projection of resources between fiscal year 2026 and fiscal year 2029. Estimates are based on 2024 allocation amounts. If the total grant received by the State is lower or higher than the funds allocated to the goals in SP-45, then each goal amount will be reduced or increased by the same proportion as the percentage difference between the estimated total grant and the actual total grant.

The amount for the remainder of the Plan is the first-year total multiplied by four (4) for the remainder of the Consolidated Plan cycle.

## 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	8,236,180	0	4,300,000	12,536,180	50,144,720	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 improvement. 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 rehabilitation Multifamily Rental New Construction, Multifamily Rental Rehab, TBRA	4,987,264	3,954,403	0	8,941,667	35,766,669	Acquisition, Construction, Rehabilitation, Permanent Financing, and TBRA are all eligible activities for IHFAs HOME funds.
ESG	public - federal	Financial Assistance, Overnight Shelter, Rapid Re-Housing, Rental Assistance, Services, Transitional Housing	1,115,776	0	0	1,115,776	4,463,104	Shelter Operations and Services, Homelessness Prevention and Rapid Re-housing are all eligible activities for ESG funds.

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, Multifamily Rental New Construction, Multifamily Rental Rehab	3,000,000	0	0	3,000,000	12,000,000	Extremely low income rental units may be rehabbed and constructed with HTF funds.

Table 45 - 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 **Community Development Block Program (CDBG)** 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 comes from businesses expanding or building new facilities as a result of the CDBG infrastructure improvements.

With the projected \$41 million over the five (5)-year period 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 CDBG funded project.

**Emergency Solutions Grant (ESG)** match contributions include external funding from a variety of federal, State, local, and private sources. ESG imposes a 100% match requirement which may be fulfilled by cash donations or in-kind services. These cash and in-kind donations to the ESG program 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.

**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 Community Housing Development Organizations (CHDO) as an annual operating assistance grant. The remaining funds are awarded to owners, developers, and homebuyers for eligible HOME-assisted activities.

The **Housing Trust Fund (HTF)** does not require matching funds. For the Housing Trust Fund, 90% of each allocation will be used for eligible HTF rental activities. 10 percent (10%) 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.

**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**

## SP-45 Goals Summary – 91.215(a)(4)

### Goals Summary Information

The Anticipated Resources Matrix in SP-25 outlines the amount of program funds estimated for year one (1) and a projection of resources between fiscal year 2026 and fiscal year 2029. Estimates are based on 2024 allocation amounts. If the total grant received by the State is lower or higher than the funds allocated to the goals in this SP-45, then each goal amount will be reduced or increased by the same proportion as the percentage difference between the estimated total grant and the actual total grant.

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Facilities/Infrastructure-Compliance	2025	2029	Affordable Housing, Homeless, Non-Homeless, Special Needs, Non-Housing Community Development		Housing related activities, Public Facilities, Public Infrastructure	CDBG: \$15,670,225	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 60,000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 60 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Public Facilities/Infrastructure-Rehabilitation	2025	2029	Affordable Housing, Homeless, Non-Homeless, Special Needs, Non-Housing Community Development		Housing-Related Activities, Public Facilities, Public Infrastructure	CDBG: \$18,804,270	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 85,000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 120 Households Assisted
3	Public Facilities/Infrastructure/Public Service New Construction or Purchasing	2025	2029	Affordable Housing, Non-Homeless, Special Needs, Non-Housing Community Development		Public Facilities, Public Infrastructure	CDBG: \$15,670,225	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 60000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 60 Households Assisted
4	Economic Development-Job Creation	2025	2029	Non-Housing Community Development		Economic Development	CDBG: \$6,268,090	Jobs created/retained: 250 Jobs Businesses assisted: 5 Businesses Assisted
5	Economic Development-Downtown Revitalization	2025	2029	Non-Housing Community Development		Cleanup of blighted properties	CDBG: \$6,268,090	Other: 10 Other Properties

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Provide Suitable Living Environment	2025	2029	Homeless		Homeless Shelter Operations & Prevention, Housing related activities	ESG: \$5,585,330 Continuum of Care: \$20,254,660 ESG Match: \$5,585,330	Tenant-based rental assistance / Rapid Rehousing: 1100 Households Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 6525 Beds Homelessness Prevention: 2500 Persons Assisted
7	Provide Decent Affordable Housing	2025	2029	Affordable Housing		Create Affordable Homeownership Opportunities, Create and Preserve Affordable Rental Housing	HOME: \$44,708,337 HTF: \$15,000,000	Rental units financed: 150 Household Housing Unit Direct Financial Assistance to Homebuyers: 125 Households Assisted TBRA: 100 Households Assisted

Table 46 – Goals Summary

**Goal Descriptions**

1	<b>Goal Name</b>	<b>Public Facilities/Infrastructure-Compliance</b>
	<b>Goal Description</b>	<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>First, for the state Community Development Block Grant (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.</p> <p>Second, 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	<p><b>Goal Name</b></p> <p><b>Goal Description</b></p>	<p><b>Public Facilities/Infrastructure-Rehabilitation</b></p> <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>First, for the state Community Development Block Grant (CDBG) program, the Public Facilities/Infrastructure- Rehabilitation. Consists of a large diverse number of activities, therefore, by allocating 30% to this goal it gives local governments a fair amount of flexibility to submit an application based on their Public Facility/Infrastructure- Rehab needs.</p> <p>Second, 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 ore, Commerce may 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.</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>
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<b>3</b>	<b>Goal Name</b>	<b>Public Facilities/Infrastructure/Public Service New Construction or Purchasing</b>
	<b>Goal Description</b>	<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>For the state Community Development Block Grant (CDBG) program, the Public Facilities/Infrastructure-New Construction goal consists of a large diverse number of activities, therefore, by allocating 25% of funding to this goal it gives local governments a fair amount of flexibility to submit an application based on their Public Facility/Infrastructure-New Construction needs.</p> <p>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>
<b>4</b>	<b>Goal Name</b>	<b>Economic Development-Job Creation</b>
	<b>Goal Description</b>	<p>This goal addresses public infrastructure improvements for business expansion and subsequent job creation for low-to-moderate income persons.</p> <p>Idaho needs job creation, especially higher paying jobs, to address the overall housing affordability challenges. 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>
<b>5</b>	<b>Goal Name</b>	<b>Economic Development-Downtown Revitalization</b>
	<b>Goal Description</b>	<p>Public improvements to downtown blighted areas.</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>

<b>6</b>	<b>Goal Name</b>	<b>Provide Suitable Living Environment</b>
	<b>Goal Description</b>	This program will support individuals experiencing homelessness through the provision of tenant-based rental assistance, emergency shelter, and homelessness prevention.
<b>7</b>	<b>Goal Name</b>	<b>Provide Decent Affordable Housing</b>
	<b>Goal Description</b>	The HOME Program will award funds to approved eligible affordable rental housing and homebuyer activities during the 2025 Program Year. For future years, IHFA is exploring the development of a Tenant Based Rental Assistance Program. IHFA anticipates all activities approved in the Program Year 2025 should be completed by the end of Program year 2028.

## SP-50 Public Housing Accessibility and Involvement – 91.315(c)

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

Idaho Housing and Finance Association (IHFA) administers the State of Idaho's Section 8 Housing Choice Voucher program in 34 of 44 counties. IHFA is only one of a statewide network of public housing providers. IHFA does not oversee any citywide or countywide Participating Jurisdictions (PJs) for public housing. These PJs have a local governing board responsible for appointing the governing structure of the local Public Housing Authority (PHA) and direct PHA activities.

IHFA administers the Veterans Affairs Supportive Housing (VASH) voucher program for homeless veterans. One of the barriers identified when the program was first implemented, was that security deposits were frequently a barrier for participants under this program. IHFA successfully applied for funding from the Home Partnership Foundation to provide security deposits, when needed for these clients.

IHFA also administers the Mainstream voucher program that assists non-elderly persons with disabilities who are transitioning out of institutions or who are homeless for whom security deposits and unit modifications for accessibility would be a barrier to successful leasing. IHFA will continue to apply for these funding types.

### **Activities to Increase Resident Involvements**

IHFA will continue to make available a Housing Choice Voucher Homeownership program, currently available only to disabled households and those voucher households currently participating in the voucher Family Self Sufficiency program.

IHFA holds annual HUD PHA Plan public hearings and performs outreach in each area that IHFA has a branch office administering Section 8 vouchers to encourage participation in a Resident Advisory Board.

### **Is the public housing agency designated as troubled under 24 CFR part 902?**

No

### **Plan to remove the 'troubled' designation**

N/A

## SP-55 Barriers to affordable housing – 91.315(h)

### **Barriers to Affordable Housing**

A barrier to affordable housing in an action, omission, or decision (1) taken because of race, color, religion, sex, disability, familial status, or national origin (referred to as protected classes) that restrict housing choices or the availability of housing choices, (2) that have the effect of restricting housing choices or the availability of housing choices based on a protected class, or (3) that constitutes or contributes to a denial of housing. Beyond basic education and outreach, any recipient of federal funds from the U.S. Department of Housing and Urban Development must document actions that ‘affirmatively further fair housing.’ The State’s 2022-2027 Analysis of Impediments to Fair Housing (AI) provides an overview of impediments to housing access and fair housing compliance. The AI also sets forth action steps to address these impediments over the next five years. These impediments and actions are summarized below.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

Below are key impediments and corresponding broad action items identified in the 2022-2027 AI. These actions will be carried out during the period of this Consolidated Plan to address barriers to affordable housing.

***Impediment No. 1:*** Many Idaho workers earn low wages that have failed to keep pace with housing cost increases and some residents remain unemployed despite a strong labor market. These residents face persistent cost burden.

Action item No. 1: Address workers’ and residents’ housing needs through incentives, funding, and technical assistance.

***Impediment No. 2:*** Housing needs persist—and disproportionately affect persons with disabilities and racial and ethnic minority households.

Action item No. 2a: Reduce disparities in housing needs among persons with disabilities and racial and ethnic minority households.

Action item No. 2b: Increase the number of accessible and visitable housing units and accessible neighborhoods for persons with disabilities.

***Impediment No. 3:*** Idaho’s regulatory stance on laws affecting affordable housing does not actively facilitate housing production.

Action item No. 3: Support legislative efforts to expand housing choice.

***Impediment No. 4:*** Knowledge of fair housing laws and rights could be improved to facilitate housing choice.

Action item No. 4: Continue fair housing education and outreach and further local governments' adoption of AFFH principles.

## SP-60 Homelessness Strategy – 91.315(d)

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

To execute outreach efforts across the Balance of State Continuum of Care (BoS CoC's) broad geographic area, which spans 82,582 square miles, the recipient leverages partnerships with nonprofit organizations throughout Idaho. In the upcoming years, the IHFA recipient will continue to support these agencies in their efforts to ensure persons experiencing unsheltered homelessness are identified and assessed. Many agencies utilize staff, advocates, and volunteers to provide outreach efforts. Agencies also leverage partnerships with organizations including school districts, law enforcement agencies, healthcare providers, parks and recreational departments, libraries, food pantries, emergency shelters, and others to facilitate outreach efforts. (A COC is a local or regional planning body that coordinates funding and services for people experiencing homelessness, aiming to end homelessness and provide stable housing and support. A BoS COC is a system, often encompassing rural areas and smaller cities, that addresses homelessness by coordinating efforts to provide housing and services, often in areas not covered by other COCs.)

Outreach is conducted during the annual Point-In- Time (PIT) Count through identification of those experiencing unsheltered homelessness in geographically diverse locations. Partner agency staff and PIT count volunteers are trained to “meet” individuals experiencing homelessness where they are physically located and to assess their level of readiness to engage in services. During initial conversations, representatives provide helpful information based on an individual's specific need.

The recipient will continue to administer the Coordinated Entry system, which ensures homeless persons are directed towards the resources that have the highest likelihood of reducing their extent of homelessness, or diverted from homelessness altogether. Using a consistent and well-coordinated approach, the process relies on streamlining access to housing assistance, screening applicants for eligibility, 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. To reach people least likely to seek homelessness assistance, the recipient works in collaboration with the Idaho Department of Health and Welfare's 211 Care Line, Health and Welfare Navigators, Regional Coalition members, United Way's FindhelpIdaho.org, and PATH peer specialists to ensure people throughout the

CoC's geographic area are aware of, and have access to, the Coordinated Entry system.

In addition to the outreach efforts above, the BoS CoC has created compensated subcommittees to gather information from adults and youth with Lived Experience (LE) of unsheltered homelessness. These subcommittees are the Lived Experience Panel (LEP) and the Youth Action Board (YAB). Between the two subcommittees, there are more than 35 representatives across all six regions of the BoS CoC that provide LE feedback on outreach and resources to the continuum. Many CoC policies and governing documents have been revised by members of the LEP and YAB.

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

Although ESG funding awards can vary year to year, roughly 45% of annual ESG funding is allocated to emergency shelters. During the last grant term, of the 14 emergency shelters receiving funding in Idaho, five (5) focused on domestic violence survivors, two (2) focused on runaway/homeless youth, and one (1) focused on veterans. Representatives from the subrecipients managing these shelters, as well as representatives from transitional housing agencies not funded through ESG, participate in Regional Coalition meetings. Coalitions provide a forum for the recipient, subrecipients, and other community stakeholders to collectively address needs of homeless persons. Regional Coalition meetings continue on a monthly or quarterly basis.

Qualitative data on emergency shelters and transitional housing programs is gathered through the Lived Experience Panel (LEP), comprised of individuals with lived experience (LE) of homelessness, many being participants in ESG emergency shelter projects. LE feedback is also gathered via annual CE participant surveys, wherein the BoS CoC gains feedback from participants regarding how they feel they have been treated by CE agencies.

Throughout the year, the recipient collects and analyzes data to gain a better understanding of the needs among individuals utilizing emergency shelters and transitional housing in Idaho. This data also informs decisions pertaining to the Coordinated Entry system.

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

The Idaho BoS CoC provides grants to 12 permanent supportive housing (PSH) projects throughout the state. In addition, the CoC and ESG programs fund 16 rapid rehousing (RRH)

projects. Many of these projects employ a housing specialist, who works with landlords to facilitate access to affordable housing within the community.

Subrecipients that receive ESG and CoC funding are required to use a Coordinated Entry system for housing prioritization. Coordinated Entry utilizes Access Points to administer assessments. Through this system, individuals experiencing chronic homelessness are prioritized. This is further refined by prioritizing subgroups, including households with pregnant members, individuals within the justice system, survivors of domestic violence, youth, households with children, and households with persons aged (62) and older. Assessments also identify if a client has recently left a mental or physical health facility, and ensure they receive the appropriate supportive housing. Through Access Points, those at risk of homelessness are referred to agencies engaged in homelessness prevention services.

Additionally, the BoS CoC has two lived experience (LE) of homelessness subcommittees: the Lived Experience Panel (LEP) and the Youth Action Board (YAB). The LEP and YAB are statewide groups designed to integrate the feedback of individuals and families with LE. The LEP and YAB have input on the CE assessment rating and ranking scale. Additionally, they share how to improve the transition to PSH programs. There are currently more than 35 members between the two subcommittees.

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

The BoS CoC continues 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 guide this work:

1. The recipient will, over the next five (5) years, 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 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. The recipient will continue, over the next five (5) years, to strengthen relationships with school systems and the foster care system in Idaho to prevent homelessness among youth aging out of foster care. The recipient received Youth Homeless System Improvement (YHSI) funds in order to build capacity to increase partnerships with these entities and other stakeholders in youth homelessness prevention and response. They also received Youth Homeless Development Planning (YHDP) grant funding to assist youth exiting the foster care system transition into more permanent housing.

3. The recipient will continue to let the Youth Action Board (YAB) lead YHSI and YHDP initiatives. The YAB is comprised of many youths who have exited foster care, corrections programs, and other institutions or have exited from homelessness. The YAB use their insight to guide program development and keep other youths from experiencing homelessness.

4. Over the next five (5) years, the recipient 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 59% of the ESG funding not associated with shelter activities is used to fund Homelessness Prevention or Rapid Rehousing (RRH) efforts. This funding allocation will remain fairly 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 next five (5) years, the recipient 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 to appropriate programs as they are available.

## SP-65 Lead based paint Hazards – 91.315(i)

Housing that will be assisted with Federal funds in Idaho is required to have an Environmental Protection Agency (EPA) Risk Assessment/Paint Testing to determine the presence of Lead-Based Paint (LBP) prior to a commitment of funds for rehabilitation if constructed on or before January 1, 1978.

### **Estimated Number of Housing Units Occupied by Low or Moderate-Income Families with LBP Hazards**

Based on 2018-2022 American Community Survey (ACS) figures, about 42% of Idaho's owner-occupied housing stock and 47% of renter-occupied housing stock was built prior to 1980. Based on the age of this housing, one could assume that some of those units will have Lead-based paint (LBP). While not all homes built before 1980 have LBP homes built between 1940 and 1959 (75,593 units) have a higher risk for having LBP.

With 21% of the rental homes and 14% of owned units built before 1980 having a presence of children under the age of 6, it is important to assume any exposure to LBP would be detrimental to those families. The higher rate for rental units is particularly worrisome, for in many cases families renting a pre-1980 housing unit may not have the financial means to easily move or the resources to reach out to test for LBP.

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

The Lead-Based Paint (LBP) Poisoning Prevention Act prohibits the use of LBP in all residential structures constructed on or after January 1, 1978 (exemptions apply). Idaho has a total of **701,196** residential properties; 38% of these units were built before 1980. While not all homes built before 1980 have LBP homes built before 1950 (76,635 units) have a higher risk for having LBP. It is noted that these estimates do not account for the number of housing units that have had lead hazard reduction or elimination activities. Accordingly, the number of residential units in Idaho with significant LBP hazards is likely to be significantly lower. Additional information is available below.

### **How are the actions listed above integrated into housing policies and procedures?**

The State of Idaho has not adopted a state level Lead-based paint/hazard reduction program. Therefore, residential acquisition and/or rehabilitation activities are required to follow the EPA Lead-Based Paint (LBP) Renovation, Repair, and Paint Rule (RRP). This rule applies to all permanent residential housing built before January 1, 1978. Because there is no state level program, EPA must approve and certify all Idaho's LBP trainers, risk assessors/paint testers and renovation firms/workers in Idaho; it does not recognize other state level programs or

certifications, i.e. Oregon. When HUD funds are used residential acquisition and/or rehabilitation activities, HUD's Lead-Safe Housing Rule (LSHR) also applies to the activity. In cases where either the RRP Rule or HUD's LSHR is more restrictive, the most restrictive rule will apply.

There are certain LBP rule exemptions under EPA's RRP rule, however, to be defined as an acceptable exemption under the HOME/HTF Program, HUD LSHR must also identify it as an exemption. The most restrictive rule will apply.

LBP policies and procedures are outlined Annual Administrative Plan and enforced through a written agreement with the owner. LBP tenant disclosure requirements and LBP hazard identification and reduction activities requirements are monitored for compliance during the period of affordability.

IHFA supports the position that education and training will reduce LBP hazards in Idaho's residential housing. While Idaho does not define IHFA as a State agency, HUD does define IHFA as a State agency for program administration purposes. Therefore, IHFA is ineligible to apply for HUD LBP training program funds.

**Discussion:**

At the local level, some cities have taken proactive steps to lower those numbers further. For example, the city of Pocatello's Planning and Development Services Department received a \$1.5 million Lead-Based Paint Hazard Control Grant from HUD's Office of Lead Hazard Control and Healthy Homes in 2018. Since then, the city has used the funding to launch a Lead Safe and Healthy Homes initiative. The initiative aims to provide LBP hazard control through licensed and certified contractors at no cost to homeowners and renters in the area. Similar local efforts across the state will help reduce exposure to LBP hazard even further in the state.

## SP-70 Anti-Poverty Strategy – 91.315(j)

### **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

While Idaho Housing and Finance Association (IHFA) is not a state agency, the populations it serves in affordable housing are often the same population the Idaho Department of Health and Welfare (IDHW) serves. Although not necessarily a coordinated effort, IDHW goals and anti-poverty strategies are consistent with many of IHFA's affordable housing strategies.

Small Business Loan Program-Funding for this Program (Program) is provided by the U.S. Department of Treasury (Treasury) under the State Small Business Credit Initiative (SSBCI), authorized under the Small Business Jobs Act of 2010. IHFA was approved as administrator for Idaho's \$13.2 million allocation on August 15, 2011. The Program is a collaborative partnership between the U.S. Department of Treasury, Idaho Department of Commerce, and IHFA. Idaho small businesses who are interested in this Program work through their local lending institutions to qualify. In summary, the Program places pledged cash deposits with lending institutions to enhance the collateral of qualified small business borrowers who would not otherwise be able to obtain financing. In September of 2013, Treasury granted IHFA permission to add non-federal funds into the Collateral Support Program. To date, an additional \$7 million in non-federal funds has been added to the Program. Through December of 2019, five hundred eighty three (583) collateral deposit accounts have been established to assist Idaho small business owners in securing over \$380 million in private lender loans.

The IDHW is working to address processes and procedures that challenge clients' ability to enroll in and retain key work supports while improving childcare eligibility policies, as well as the Idaho Child Care Program (ICCP) business processes and technology, by building on successes in SNAP, Medicaid, and cash assistance programs.

Idaho aims to better integrate its work support programs, including SNAP, Medicaid, and ICCP, to streamline benefit renewal for eligible families and support improved outcomes for them.

The department aims to increase the productivity of its eligibility workforce by further implementing a universal workforce service delivery model.

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?**

IHFA- Households who participate in the federal Section 8 Housing Choice Voucher (HCV) 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 five (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.

HOME funds will be made available to support FSS participants desiring to purchase a housing unit in the form of a silent second loan. This loan will be downpayment assistance to encourage participants who are ready with choice in purchasing a housing unit.

When HUD funds are used to create multifamily affordable housing, HUD's Section 3 and Minority and Women-Owned Business Entities (MBE/WBE) requirements help target local economic development to low-income residents and business entities, as well as MBE/WBE. Section 3 outreach requirements are determined on the basis of the entire project's aggregate federal funding. Examples of local outreach can include advertising potential employment opportunities in the area the project will be located, and submitting the project information Idaho's and HUD's Section 3 Business Entity Registration. Section 3 and MBE/WBE requirements are identified in the HOME Administrative Plan and are included in HOME written agreements and Loan and Regulatory agreement as they apply to the project.

#### **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 funds will be made available to support FSS participants desiring to purchase a housing unit in the form of a silent second loan. This loan will be downpayment assistance to encourage participants who are ready with choice in purchasing a housing unit.

When HUD-CPD funds are used to create affordable housing, applicable Section 3 and Minority and Women-Owned Business Entities (MBE/WBE) requirements will target local economic development to low-income residents and business entities. Section 3 outreach requirements

are determined on the basis of the entire project's aggregate federal funding. Examples of local outreach can include advertising potential employment opportunities in area the project will be located, submitting project information and potential employment opportunities to Idaho's and HUD's Section 3 Business Entity Registration. Section 3 and MBE/WBE requirements are identified in the HOME Administrative Plan and are included in HOME written agreements, as they apply to the project.

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

The Idaho Department of Commerce's anti-poverty strategy is to assist cities and counties who construct infrastructure that aids in a businesses' development that leads to job creation and retention. At a minimum, 51% of these jobs must be taken by low-to-moderate income (LMI) individuals, including individuals at poverty level. Jobs taken by LMI individuals should increase their income and help them develop more marketable skills as well as their confidence. Commerce is creating opportunity for poverty individuals.

Second, is the implementation of HUD's Section 3 regulations, which fosters local economic development and individual self-sufficiency for low-income persons in the solicitation of professional services and construction work needed to complete ICDBG projects. The purpose of these requirements is to ensure that a greater share of economic opportunities generated by ICDBG funding is targeted to low-income individuals and families who live in the grantee's jurisdiction. ICDBG funded grantees and contractors must make a good faith effort to award contracts to Section 3 business concerns and utilize Section 3 area residents as trainees and employees. Section 3 requirements are applicable when projects receive \$200,000 or more in federal funds.

Third, IDC advertises ICDBG funded projects through Idaho's Procurement Technical Assistance Center to ensure professional and construction services on Community Development Block Grant Program (CDBG) funded projects are directly solicited to Disadvantaged and Women Business Enterprises.

Fourth, IDC provides additional points to job creation projects that are located or sited in the Small Business Administration's HUB Zones and Opportunity Zones. HUB Zones are historically underutilized business zones that typically have higher rates of unemployment or lower per capita income than national levels. Opportunity Zones are an economically-distressed community / census tract.

Fifth, In 2018, Idaho designated twenty eight (28) census tracts as Opportunity Zones. Opportunity Zones is a program of the Tax Cuts and Jobs Act of 2017 to encourage long-term

investment in low-income urban and rural communities. Private investment vehicles that place 90% or more of their funds into an Opportunity Zone can earn tax relief on the capital gains generated through those investments. Tax benefits increase the longer the investments are in place. Commerce continues to market the established zones at its website and offer information.

In other efforts to help spur job creation projects within Idaho's Opportunity Zones, Commerce has amended its scoring on CDBG job creation projects to include additional point for projects located within an opportunity zone and or SBA HUB zone.

## SP-80 Monitoring – 91.330

**Describe the standards and procedures that the state will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements.**

The standards and procedures that the state will use to monitor activities are described in the Unique Appendices.

Idaho Housing and Finance Association (IHFA) and Idaho Department of Commerce (Commerce) utilize written policies, procedures, and monitoring guides to help ensure activities comply with program requirements, cross-cutting federal regulations, including minority business outreach; state, and local laws, regulations, ordinances, and standards; and local comprehensive planning requirements.

### **CDBG**

Commerce monitors all CDBG funded projects to ensure compliance with applicable program rules and regulations. The Commerce monitoring process starts before the actual funding of an application and continues until project closeout. This dynamic process helps to ensure projects meet program requirements and improves the chances that any violations or potential violations are identified and corrected.

#### **Pre-Development Monitoring:**

Local governments who anticipate applying for CDBG funds are encouraged to contact Commerce. Commerce provides recommendations and technical assistance to local governments to help them understand the CDBG program requirements. Pre-development reviews also provide Commerce an understanding of the potential projects and an early assessment to determine if it will meet the CDBG goals and regulations.

#### **Application Monitoring:**

During the review of the applications, Commerce staff first determines if the application meets the required eight threshold factors, which include national objectives and eligible activities. If the application meets the eight threshold factors, further review of the application continues to determine if the project will meet program goals and strategies, procurement rules, acquisition and relocation requirements, citizen participation, and an assessment of the environmental review requirements. Local governments' accomplishments towards furthering fair housing and accessibility (504) standards are also reviewed.



Generally, Commerce conducts a monitoring of the environmental review conduct by the local government prior to execution of the Commerce contract. If the environmental review is not completed before contract execution, it is monitored prior to the release of funds.

**Project Monitoring:**

Commerce conducts a risk assessment of each project, utilizing the department’s Determination of On-site Monitoring criteria to establish if the project will require on-site monitoring or if the desk monitoring process will be sufficient. Commerce monitors all CDBG funded projects and reviews the local government’s financial audits. During the course of a project Commerce staff is continually monitoring the following applicable project components:

Financial Management	Procurement	Labor Standards
Acquisition & Relocation	Civil Rights	Fair Housing Activities
Citizen Participation	Section 504 ADA Standards	Performance

Following project award Commerce will take steps to ensure Minority/Women-owned business enterprises, HUB Zone businesses, disabled veteran-owned businesses and SBA Section 8(a) businesses in Idaho are notified of opportunities to provide goods and services through Idaho APEX Accelerator procurement center.

Commerce has chosen to implement the CDBG funded projects notification to APEX directly, rather than rely on the CDBG grantee to submit their invitation to bid to the APEX. This provides for an earlier notification to potential contractors. Early notification helps to ensure that potential contractors know well in advance of upcoming projects, rather than a two-week bid solicitation period. This provides disadvantaged businesses, with limited resources and time, a better opportunity for submitting and possibly obligating themselves to a bid. Commerce does request and receive a list from APEX of the business that received the notification and their applicable preference.

Commerce does require, however, that the CDBG grantee submit a Request for Proposals (RFP) for design professional and grant administration services directly to the APEX. The APEX sends the summary RFP out to its clients via email.

Commerce utilizes its in-house monitoring guide that is required to be completed by staff specialist prior to project closeout. Commerce Specialists review and approve every CDBG request for payment. This requires the Specialist to ensure requested CDBG expenditures are allowable and appropriate. Requests for payment are required to be supported by an invoice and executed contract. Commerce has an established process of receiving and reviewing a local government’s independent financial audit for any open project or project closed out within one

year. The audit is reviewed by Commerce to determine if there are any findings and if so, do they affect the CDBG funds.

#### **On-Site Monitoring:**

Commerce plans to conduct an on-site monitoring of at least 25% of open CDBG grants during each program year, regardless of the program year in which the CDBG was funded. On-site monitoring consists of review of the local government's (grantee) project files, interviewing grantee staff, and site observation.

Before closeout of a CDBG funded project, the local government chief official is required to submit a final financial and performance report. The report is review by a Commerce Specialist for accuracy and comparable with Commerce monitoring documentation.

### **Idaho Housing and Finance Association (IHFA)**

#### **HOME Program**

IHFA's HOME Department is responsible for ensuring HOME activities are monitored for compliance. IHFA uses legal instruments that include the HOME, federal, state, local, and IHFA requirements as well as remedies for breach of contract or failure to follow requirements. The written agreement with the owner is executed prior to the disbursement of HOME funds, as described at §92.254 for homebuyer activities and §92.504 for rental activities. For HOME activities that involve development (rehabilitation, construction), IHFA's HOME Department is responsible for ensuring inspections are conducted during the development phase and prior to completion in HUD's Integrated Disbursement and Information System (IDIS). This includes an initial, progress, and final inspection to ensure the development activity is complete prior to sale or completion in IDIS. (IDIS is a management information system used by HUD for tracking and managing funds for its Community Planning and Development (CPD) formula grant programs, including CDBG, HOME, HTF, and ESG.)

When HUD funds are used to create multifamily affordable housing, HUD's Section 3 and Minority and Women-Owned Business Entities (MBE/WBE) requirements help target local economic development to low-income residents and business entities, as well as MBE/WBE. Section 3 outreach requirements are determined on the basis of the entire project's aggregate federal funding. Examples of local outreach can include advertising potential employment opportunities in the area the project will be located and submitting the project information Idaho's and HUD's Section 3 Business Entity Registration. Section 3 and MBE/WBE requirements are identified in the HOME Administrative Plan and are included in HOME written agreements and Loan and Regulatory Agreement as they apply to the project. Each developer for each project self certifies they are meeting the HUD Section 3 and MBE/WBE requirements.

### Homebuyer Properties Activities

IHFA's HOME Department conducts a compliance monitor of all HOME-assisted homeowner units annually to determine the homebuyer continues to meet the HOME program's Principle Residence requirement during the period of affordability. This requirement is described in the homebuyer Occupancy Certification and the Deed of Trust. If IHFA's monitoring determines the HOME-assisted homebuyer no longer resides in the HOME-assisted unit during the period of affordability and hasn't received a military or full-time student exception from IHFA-HOME, IHFA will take steps to attempt to get the homeowner to return to the HOME-assisted unit. However, if the HOME-assisted unit is not occupied as the homebuyer's Principle Residence, IHFA will take appropriate action to recover the HOME funds invested in the unit as identified in the Occupancy Certification and Deed of Trust Note.

### Rental Activities

IHFA's HOME Department conducts periodic progress inspections and a final inspection during the development phase of the activity. Within twelve (12) months of project completion and every three (3) years thereafter, IHFA's Compliance staff will conduct physical inspections of the property to ensure continuing compliance with state and local housing codes and HOME's property standards. In addition, IHFA Compliance staff will review and approve each owner's annual certification of continuing compliance with HOME rent restrictions, HOME unit tenant income, and continuing suitability for occupancy according to local health, safety, and building codes, as well as HOME property standards. They will also assess the owner's reasonable attempts to rent all vacant low-income units before renting units of comparable size to tenants who did not have qualifying income, adherence to the HOME floating or fixed units' rule and its application, and compliance with cross-cutting laws and regulations. HOME rental housing compliance monitoring policies and procedures are identified in the *IHFA Compliance Monitoring Manual*. See <http://www.rentalcompliance.org/housing-compliance-services/tax-credit-home.aspx>

### Rental Housing Risk-based Financial Assessment

IHFA's HOME staff will annually assess the financial viability of HOME-assisted rental projects following a written procedure. The assessment includes input from the IHFA's Compliance staff based on their physical inspections, tenant file reviews, and owners' certification of continuing compliance. The following projects have been determined to have a greater than average risk:

- Projects within five (5) years of the end of the HOME affordability period
- Projects with HOME loan terms of Due-on-Sale or Net Operating Income (NOI)
- Projects on the 'watch' list, as determined by IHFA Compliance staff
- Projects with inconsistent or nonpayment history

- Projects with ten (10) or more HOME units, which require a HUD mandated financial assessment. The most current financial statements are reviewed using a Tier 1 Easy Risk Assessment Tool (Easy RAT). The quick financial calculation helps determine two aspects: Is the project generating a positive cash flow; is there available cash sufficient to pay accounts payable. Consideration is given for other issues such as whether the auditor/accountant has concerns or required replacement reserve deposits are adequate.

The result of the Easy RAT is a 'Pass' or 'Fail,' which determines the next step.

Projects that "Pass" the Easy RAT and have no other significant areas of concern are determined to be in a stable financial position. Additional review may be conducted because of other specific triggers.

Projects that "Fail" the Easy RAT are further assessed, beginning with Tier two (2) Assessment. This phase looks at factors beyond simply operating cash and short-term debt. Aspects such as vacancy rate, HOME unit mix, location, and geographic factors, are reviewed for their impact on rental demand.

In some cases, based on the Tier two (2) Assessment outcome, a historical spreadsheet may be created. The purpose of this additional assessment is to provide a comprehensive review from the perspective of the project. It may provide options and recommendations for IHFA and/or the project Owner/Manager.

The IHFA's HOME Department is ultimately responsible for ensuring the compliance of all HOME-assisted activities. The monitoring procedures are identified in the HOME Administrative Plan, the IHFA Compliance Monitoring Manual (rental housing activities), and the HOME Written Procedures Manual.

### Community Housing Development Organizations (CHDO)

IHFA conducts annual certification of all CHDOs to ensure they continue to meet all CHDO requirements. Organizations are allowed to certify at anytime throughout the year, they must be certified (again) prior to each commitment of CHDO Set-aside Funds. The certification process includes the submission of:

1. Individual board member certifications (to determine low-income/public sector status),
2. Current By-laws,
3. Articles of Incorporation
4. Evidence of legal status
5. Description of current formal process to include low-income beneficiaries in the siting, development, and management of affordable housing,
6. Resumes of all CHDO staff (including development staff for capacity)

7. The most current financial statement
8. Conflicts of interest policies and
9. Evidence of adherence to HOME's Financial Management Standards.

### **Emergency Solutions Grant (ESG) Program Monitoring**

Multiple forms of ESG monitoring exist: project, performance, and HMIS/CMIS. Project compliance will be carried out by the Collaborative Applicant. Performance compliance will be enforced by the Balance of State (BoS) Continuum of Care (CoC) committees and the Collaborative Applicant. HMIS/CMIS compliance will be conducted and enforced by the HMIS Lead Agency, which is also IHFA.

In executing project compliance, the Collaborative Applicant will establish and maintain standard procedures for ensuring that CoC and ESG Program funds are used in accordance with federal requirements, and will establish and maintain sufficient records to enable the U.S. Department of Housing and Urban Development (HUD) to determine whether subrecipients are meeting the requirements of 2 CFR 200.

CoC and ESG Program monitoring activities will include financial, and project compliance outlined in 2 CFR 200 and identified in this policy and the supporting CoC and ESG Project Monitoring Checklists.

HUD maintains responsibility for monitoring all CoC and ESG recipients, including monitoring a sample of subrecipients when a recipient is selected for HUD program monitoring. Noncompliance with HUD, and local regulation, and policy may result in the full or partial defunding of a grant, required technical assistance and/or training, required transfer of the grant to a new subrecipient, or a variation of the remedies herein.

Performance compliance will be carried out by the Strategic Planning Committee, in conjunction with BoS CoC committees, with support from the HMIS Lead Agency. Performance includes adherence to system performance, data quality, and data completeness measures or standards. Any defunding or reassigning of grant activities must be approved by the BoS CoC's Board. Additional detail regarding this process is included in the BoS Written Standards under Systemwide Performance Measures.

Execution of HMIS/CMIS monitoring will be completed by the HMIS Lead Agency. All HMIS/CMIS users and HMIS/CMIS-participating agencies will be monitored at least annually. All agencies required to participate in HMIS or CMIS through CoC or ESG grant awards may experience delays in reimbursement payments from the Collaborative Applicant for failure to comply with HMIS or CMIS collection and reporting standards until such time that the agency is in compliance.

# Expected Resources

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

### **Introduction**

Idaho Housing and Finance Association (IHFA) is the allocating agency for Idaho's Low-Income Tax Credit program (LIHTC), the designated administrator for Idaho's HOME Investment Partnership Program (HOME), National Housing Trust Fund Program (NHFT), and the Emergency Solutions Grant Program (ESG). The Idaho Department of Commerce (Commerce) is the designated Administrator of Idaho's Community Development Block Grant Program (CDBG).

The Anticipated Resources Matrix below outlines each of these funds, expected amounts available in Year one (1) and a projection of resources between fiscal year 2025 and fiscal year 2029. Estimates are based on 2024 allocation amounts. If the total grant received by the State is lower or higher than the funds allocated to the goals in SP-45, then each goal amount will be reduced or increased in the same proportion as the percentage difference between the estimated total grant and the actual total grant.

The Amount for the remainder of the Plan is the first-year total multiplied by four (4) for the remainder of the Consolidated Plan cycle.

**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	8,236,180	0	4,300,000	12,536,180	50,144,720	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	Administration, Admin & Planning, Acquisition, Homebuyer Assistance, Multifamily Rental New Construction, Multifamily Rental Rehab TBRA	4,987,264	3,954,403	0	8,941,667	35,766,669	Acquisition, Construction, Rehabilitation, Permanent Financing, and TBRA are all eligible activities for IHFAs HOME funds.
ESG	public - federal	Financial Assistance, Overnight Shelter, Rapid Re-Housing, Rental Assistance, Services, Transitional Housing	1,115,776	0	0	1,115,776	4,463,104	Shelter Operations and Services, Homelessness Prevention and Rapid Re-housing are all eligible activities for ESG funds.



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, Multifamily Rental New Construction, Multifamily Rental Rehab	3,000,000	0	0	3,000,000	12,000,000	Extremely low-income rental units may be rehabbed and constructed with HTF funds.

Table 47 - 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**

**Community Development Block Grant (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 \$41 million over the five (5)-year period 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 CDBG funded project.

**Emergency Solutions Grant (ESG)** match contributions include external funding from a variety of federal, state, local, and private sources. ESG imposes a 100% match requirement which may be fulfilled by cash donations or in-kind services. These cash and in-kind donations to the ESG program 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.

The **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 Community Housing Development Organization (CHDO)s as an annual operating assistance grant. The remaining funds are awarded to owners, developers, and homebuyers for eligible HOME-assisted activities.

**Housing Trust Fund (HTF)** does not require matching funds. Housing Trust Fund- 90% of each allocation will be used for eligible HTF rental activities. Ten percent (10%) 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.

**If appropriate, describe publicly 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

The Anticipated Resources Matrix in AP-15 outlines the amount of program funds estimated for year one (1) and a projection of resources between fiscal year 2025 and fiscal year 2029. Estimates are based on 2024 allocation amounts. If the total grant received by the State is lower or higher than the funds allocated to the goals in this AP-20, then each goal amount will be reduced or increased by the same proportion as the percentage difference between the estimated total grant and the actual total grant.

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Facilities/Infrastructure-Compliance	2025	2029	Affordable Housing, Homeless, Non-Homeless, Special Needs, Non-Housing Community Development		Housing related activities, Public Facilities, Public Infrastructure	CDBG: \$3,134,045	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

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Public Facilities/Infrastructure-Rehabilitation	2025	2029	Affordable Housing, Homeless, Non-Homeless, Special Needs, Non-Housing Community Development		Housing related activities, Public Facilities, Public Infrastructure	CDBG: \$3,760,854	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
3	Public Facilities/Infrastructure/Public Service New Construction or Purchasing	2025	2029	Affordable Housing, Non-Homeless, Special Needs, Non-Housing Community Development		Public Facilities, Public Infrastructure	CDBG: \$3,134,045	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	2025	2029	Non-Housing Community Development		Economic Development	CDBG: \$1,253,618	Jobs created/retained: 50 Jobs Businesses assisted: 1 Businesses Assisted
5	Economic Development-Downtown Revitalization	2025	2029	Non-Housing Community Development		Cleanup of blighted properties	CDBG: \$1,253,618	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	2025	2029	Homeless		Homeless Shelter, Operations & Prevention, Housing related activities	ESG: \$1,117,066 Continuum of Care: \$4,050,932 ESG Match: \$1,117,066	Tenant-based rental assistance / Rapid Rehousing: 220 Households Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 1305 Beds Homelessness Prevention: 500 Persons Assisted
7	Provide Decent Affordable Housing	2025	2029	Affordable Housing		Create Affordable Homeownership Opportunities, Create and Preserve Affordable Rental Housing	HOME: \$8,941,667 HTF: \$3,000,000	Rental units constructed: 30 Household Housing Unit Direct Financial Assistance to Homebuyers: 25 Households Assisted

Table 48 – Goals Summary

## Goal Descriptions

1	<b>Goal Name</b>	Public Facilities/Infrastructure-Compliance
	<b>Goal Description</b>	<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>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	<b>Goal Name</b>	Public Facilities/Infrastructure-Rehabilitation
	<b>Goal Description</b>	<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>First, for the state Community Development Block Grant (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.</p> <p>Second, 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>
3	<b>Goal Name</b>	Public Facilities/Infrastructure/Public Service New Construction or Purchasing
	<b>Goal Description</b>	<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>For the state Community Development Block Grant (CDBG) program, the Public Facilities/Infrastructure-New Construction goal consists of a large diverse number of activities, therefore, by allocating 25% of funding to this goal it gives local governments a fair amount of flexibility to submit an application based on their Public Facility/Infrastructure-New Construction needs.</p> <p>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	<b>Goal Name</b>	Economic Development-Job Creation
	<b>Goal Description</b>	<p>Public infrastructure improvements for business expansion and subsequent job creation for low-to-moderate income persons.</p> <p>Job Creation</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>Last year 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	<b>Goal Name</b>	Economic Development-Downtown Revitalization
	<b>Goal Description</b>	<p>Public improvements to downtown blighted areas.</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. 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	<b>Goal Name</b>	Provide Suitable Living Environment
	<b>Goal Description</b>	
7	<b>Goal Name</b>	Provide Decent Affordable Housing
	<b>Goal Description</b>	The HOME Program will award funds to approved eligible affordable rental housing and homebuyer activities during the 2025 Program Year. IHFA anticipates all activities approved in the program year 2025 should be completed by the end of Program year 2028.

## AP-25 Allocation Priorities – 91.320(d)

### Introduction:

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	<b>100</b>
HOME	0	0	0	0	0	0	100	<b>100</b>
ESG	0	0	0	0	0	100	0	<b>100</b>
HTF	0	0	0	0	0	0	100	<b>100</b>
Continuum of Care	0	0	0	0	0	100	0	<b>100</b>

### Reason for Allocation Priorities

**Community Development Block Grant (CDBG)**- See AP 20 Goals 1,2,3,4 and 5 descriptions

**HOME & Housing Trust Fund (HTF)**- The 2024 Idaho Housing Needs Survey, 2024 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.

**Emergency Solutions Grant (ESG)** - Other than funding from faith-based organizations and Federal programs, Idaho’s homeless housing and service programs receive little financial support. In the absence of essential emergency shelter funding, many individuals

and families are unable to receive reprieve from homelessness through temporary assistance or access to rapid re-housing. For this reason, Idaho has directed a substantial portion of ESG funds (45%) towards emergency shelter activities. The remaining 55% is used for homelessness prevention and rapid re-housing activities, generally 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, 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. IHFA coordinates with the Boise CoC and incorporate their priorities and recommendations into allocation decisions for ESG funding.

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

**ESG** - While IHFA still places an emphasis on the importance of supporting shelter activities, all remaining funds have been reserved for homelessness prevention and rapid re-housing activities (IHFA also prioritizes rapid rehousing projects, but is only able to do so due to funding limitations imposed by HUD). Due to the changes in program regulations and the need to prioritize resources yearly based upon the ever-changing population needs, IHFA felt it appropriate to impose a goal of ensuring that the changes in policy and regulations does not decrease the number of homeless households served. In such scenarios, if a decrease in households served occurs while no waiting lists exist in emergency shelters, this would indicate a decreased need for emergency shelter beds which could allow for funds to be redirected towards homelessness prevention and rapid re-housing. This could be an appropriate and positive scenario of not meeting the goal set.

**HOME** - See AP 20 Goal 7 descriptions

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

### Introduction:

The Housing Trust Fund (HTF) regulations require Idaho Housing and Finance Association (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. 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.

Actual allocation amounts are not yet available. Expected resources and outcomes will be updated based on actual amounts when published and divided based on allocation priority percentages as described in the plan.

### Distribution Methods

Table 49 - Distribution Methods by State Program

1	<b>State Program Name:</b>	Down Payment/Closing Cost Assistance
	<b>Funding Sources:</b>	HOME

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>DP/CC assistance is awarded to low-income homebuyers as a 0% interest, due on sale or default loan to help with the purchase of a Standard Condition affordable home. Standard condition is defined as a unit that meets state and local residential code and the HOME program's property standards at the time of purchase without any rehabilitation or minor repairs.</p> <p>A HOME-assisted homebuyer must reside in the assisted unit as a primary residence during the HOME period of affordability. If an assisted homebuyer rents or otherwise occupies their HOME-assisted unit during the period of affordability, and refuses to return to the unit as their primary residence, IHFA calls the loan due and payable. IHFA allows two exceptions to the HOME primary residence requirement: Military transfer or deployment, and full-time post-secondary education. The homeowner must request an exception in writing to the HOME Programs Department, which includes a plan to return to the HOME-assisted unit.</p> <p>The HOME period of affordability is determined by the amount of HOME subsidy the homebuyer receives. Following the HOME Program's Recapture Option, the homebuyer is allowed to sell their HOME-assisted unit at any time, to any willing buyer, at whatever price the market will bear. At the time title is transferred, IHFA will attempt to recapture the entire HOME subsidy amount as available from the Net proceeds of the sale. IHFA's Recapture Option follows §92.254 (a)(ii)(A) (4 and 5). IHFA reviews the maximum amount of DPCC available on an annual basis and may increase or decrease the amount, depending on funding availability and market conditions. The maximum amount available and application requirements are published in the Annual Administrative Plan.</p>
<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>The homebuyer(s) must be able to document annual (gross) household income ≤80% AMI as defined by 24 CFR 5.609. Underwriting requirements are identified in the Annual Administrative Plan.</p> <p>The sales price of the assisted unit cannot exceed the HOME program's annual Homeownership Value Limit for the area. IHFA will conduct its own analysis for the first year action plan.</p>

<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>N/A</p>
<p><b>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)</b></p>	<p>N/A</p>
<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>N/A</p>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	

	<b>Describe threshold factors and grant size limits.</b>	This program is reviewed on an annual basis and is revised as needed in the annual HOME Administrative Plan.
	<b>What are the outcome measures expected as a result of the method of distribution?</b>	It is estimated that twenty-five (25) qualified low-income homebuyers will result.
2	<b>State Program Name:</b>	Rental Housing Production
	<b>Funding Sources:</b>	HOME HTF



<p><b>Describe the state program addressed by the Method of Distribution.</b></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. IHFA awards HOME/HTF funds as a low or no interest loan (HOME) or Due on Sale (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><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>HOME/HTF applications/proposals must include specific threshold criteria (see threshold criteria below) to receive a full review and scoring. Additional 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. HOME specific - Loan Repayment/Thirty (30) Year Maturity/MATCH/ HTF specific - Additional HTF Units/HTF Repayment choice</p>
<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>N/A</p>
<p><b>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)</b></p>	<p>N/A</p>

	<b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b>	N/A
	<b>Describe how resources will be allocated among funding categories.</b>	HOME applications/proposals must include specific threshold criteria (see threshold criteria below) to receive a full review and scoring. Additionally, IHFA 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. 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.
	<b>Describe threshold factors and grant size limits.</b>	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 Section 234 limits.  See Unique Appendices.
	<b>What are the outcome measures expected as a result of the method of distribution?</b>	Thirty (30) 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.
<b>3</b>	<b>State Program Name:</b>	State of Idaho
	<b>Funding Sources:</b>	CDBG

<b>Describe the state program addressed by the Method of Distribution.</b>	See Unique Appendices.
<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	See Unique Appendices.
<b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b>	See Unique Appendices.
<b>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)</b>	See Unique Appendices.
<b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b>	N/A

	<b>Describe how resources will be allocated among funding categories.</b>	See Unique Appendices.
	<b>Describe threshold factors and grant size limits.</b>	See Unique Appendices.
	<b>What are the outcome measures expected as a result of the method of distribution?</b>	See Unique Appendices.
5	<b>State Program Name:</b>	State of Idaho
	<b>Funding Sources:</b>	ESG

<b>Describe the state program addressed by the Method of Distribution.</b>	See Unique Appendices.
<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	See Unique Appendices.
<b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b>	See Unique Appendices.
<b>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)</b>	See Unique Appendices.
<b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b>	N/A

<b>Describe how resources will be allocated among funding categories.</b>	See Unique Appendices.
<b>Describe threshold factors and grant size limits.</b>	See Unique Appendices.
<b>What are the outcome measures expected as a result of the method of distribution?</b>	See Unique Appendices.

**Discussion:**

None.



## AP-35 Projects – (Optional)

### Introduction:

The projects below outline the program funds expected to be available in the 2025 program year. Estimates are based on 2024 allocation amounts. If the total grants received by the State for 2025 are lower or higher than the funds allocated to the projects below, then each project amount will be reduced or increased in the same proportion as the percentage difference between the estimated total grant set out in AP-15 and the actual total grant.

#	Project Name
1	CDBG-Public Facilities/Infrastructure-Compliance
2	CDBG-Public Facilities/Infrastructure-Rehabilitation
3	CDBG-Public Facilities/Infrastructure/Service-New Construction or Purchase
4	CDBG-Economic Development-Job Creation
5	CDBG-Economic Development-Downtown Revitalization
6	CDBG State Administration
7	CDBG-Technical Assistance
8	State of Idaho ESG
9	2025 HOME Administration
10	2025 Multifamily Rental -New Construction
11	HOME TBRA <i>[Not funded in 2025]</i>
12	2025 Single Family - Homebuyer - DPCC
13	2025 HTF Administration

Table 50 – Project Information

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

**Community Development Block Grant (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.

**HOME and Housing Trust Fund (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 low 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 downpayment/closing cost assistance for income eligible households to purchase a single-family housing unit.

**Emergency Solutions Grant (ESG)** - Other than funding from faith-based organizations and Federal programs, Idaho's homeless housing and service programs receive little financial support. In the absence of essential emergency shelter funding, many individuals and families are unable to receive reprieve from homelessness through temporary assistance or access to rapid re-housing. For this reason, Idaho has directed a substantial portion of ESG funds (45%) towards emergency shelter activities. The remaining 55% is used for homelessness prevention and rapid re-housing activities, generally 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, 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. IHFA coordinates with the Boise CoC and incorporate their priorities and recommendations into allocation decisions for ESG funding.

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	<b>CDBG-Public Facilities/Infrastructure-Compliance</b>
	<b>Target Area</b>	N/A
	<b>Goals Supported</b>	Public Facilities/Infrastructure-Compliance
	<b>Needs Addressed</b>	Public Facilities Public Infrastructure
	<b>Funding</b>	CDBG: \$3,056,060
	<b>Description</b>	Activities that bring facility systems (infrastructure, community facilities, public utilities) into compliance with environmental laws, federal and state standards, building codes and best management practices.
	<b>Target Date</b>	3/31/2029
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	State of Idaho estimates 12,000 persons will benefit from the proposed activities in other than housing benefit activities and 12 households in housing benefit activities.
	<b>Location Description</b>	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.
	<b>Planned Activities</b>	Project administration costs, design services, land acquisition, public facilities/infrastructure new construction, rehabilitation and compliance.
2	<b>Project Name</b>	<b>CDBG-Public Facilities/Infrastructure-Rehabilitation</b>
	<b>Target Area</b>	N/A
	<b>Goals Supported</b>	Public Facilities/Infrastructure-Rehabilitation
	<b>Needs Addressed</b>	Public Facilities Public Infrastructure Housing related activities
	<b>Funding</b>	CDBG: \$3,667,271
	<b>Description</b>	Activities that include the rehabilitation, replacement, and/or remodeling of public facilities (infrastructure, community facilities, public utilities and affordable housing) systems
	<b>Target Date</b>	3/31/2029

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	State of Idaho estimates 17000 persons will benefit from the proposed activities in other than housing benefit activities and 24 households in housing benefit activities.
	<b>Location Description</b>	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.
	<b>Planned Activities</b>	Activities that include the rehabilitation, replacement, and/or remodeling of public facilities (infrastructure, community facilities, public utilities and affordable housing) systems.
<b>3</b>	<b>Project Name</b>	<b>CDBG-Public Facilities/Infrastructure/Service-New Construction or Purchase</b>
	<b>Target Area</b>	N/A
	<b>Goals Supported</b>	Public Facilities/Infrastructure/Public Service New Construction or Purchasing
	<b>Needs Addressed</b>	Public Facilities Public Infrastructure
	<b>Funding</b>	CDBG: \$3,056,060
	<b>Description</b>	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.
	<b>Target Date</b>	3/31/2029
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	State of Idaho estimates 12000 persons will benefit from the proposed activities in other than housing benefit activities and 12 households in housing benefit activities.
	<b>Location Description</b>	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.
	<b>Planned Activities</b>	Project administration costs, design services, land acquisition, public facilities/infrastructure new construction, rehabilitation and compliance.

4	<b>Project Name</b>	<b>CDBG-Economic Development-Job Creation</b>
	<b>Target Area</b>	N/A
	<b>Goals Supported</b>	Economic Development-Job Creation
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG: \$1,222,423
	<b>Description</b>	Infrastructure improvements for business expansion and subsequent job creation
	<b>Target Date</b>	3/31/2029
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Number of businesses assisted is one and the number of jobs created will be 50.
	<b>Location Description</b>	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.
<b>Planned Activities</b>	Project administration costs, design services, land acquisition, public facilities/infrastructure new construction, rehabilitation and compliance.	
5	<b>Project Name</b>	<b>CDBG-Economic Development-Downtown Revitalization</b>
	<b>Target Area</b>	N/A
	<b>Goals Supported</b>	Economic Development-Downtown Revitalization
	<b>Needs Addressed</b>	Cleanup of blighted properties
	<b>Funding</b>	CDBG: \$1,222,423
	<b>Description</b>	Public Infrastructure improvements to prevent blighted downtown areas.
	<b>Target Date</b>	3/3/31/202931/2029
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	State of Idaho estimates two low to moderate income cities will benefit from a downtown revitalization project.
	<b>Location Description</b>	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.

	<b>Planned Activities</b>	Project administration costs, design services, land acquisition, public facilities/infrastructure new construction, rehabilitation and compliance
<b>6</b>	<b>Project Name</b>	<b>CDBG State Administration</b>
	<b>Target Area</b>	N/A
	<b>Goals Supported</b>	N/A
	<b>Needs Addressed</b>	N/A
	<b>Funding</b>	CDBG: \$253,289
	<b>Description</b>	State Administration costs associated with projects and activities.
	<b>Target Date</b>	N/A
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	Idaho
	<b>Planned Activities</b>	State administrative costs.
<b>7</b>	<b>Project Name</b>	<b>CDBG-Technical Assistance</b>
	<b>Target Area</b>	N/A
	<b>Goals Supported</b>	N/A
	<b>Needs Addressed</b>	N/A
	<b>Funding</b>	CDBG: \$78,804
	<b>Description</b>	Fair housing State Administration costs associated with projects and activities, training, and technical assistance.
	<b>Target Date</b>	3/31/2029
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	Idaho
	<b>Planned Activities</b>	N/A
<b>8</b>	<b>Project Name</b>	<b>State of Idaho ESG</b>
	<b>Target Area</b>	N/A
	<b>Goals Supported</b>	Provide Suitable Living Environment

	<b>Needs Addressed</b>	Homeless Shelter Operations, Homelessness Prevention, and Rapid Rehousing
	<b>Funding</b>	ESG: \$1,117,066
	<b>Description</b>	Includes shelter, homelessness prevention, rapid rehousing, 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.
	<b>Target Date</b>	3/31/2029
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Through ESG we expect to help at least 220 households with rapid rehousing, at least 556 households with homelessness prevention, and to support at least 1305 individuals with shelter services. Our shelters include family shelters, domestic violence shelters, and one youth shelter.
	<b>Location Description</b>	IHFA provides ESG 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.
	<b>Planned Activities</b>	With ESG funding IHFA will provide funding for shelter services and operations, homelessness prevention, rapid rehousing, data collection, and administration.
9	<b>Project Name</b>	<b>2025 HOME Administration</b>
	<b>Target Area</b>	N/A
	<b>Goals Supported</b>	Provide Decent Affordable Housing
	<b>Needs Addressed</b>	N/A
	<b>Funding</b>	HOME: \$894,166
	<b>Description</b>	Administration and Planning costs - 10% of HOME Grant and 10% of 2024 Program Income
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	Idaho
	<b>Planned Activities</b>	Administration and Planning costs

10	<b>Project Name</b>	<b>2025 Multifamily Rental - New Construction</b>
	<b>Target Area</b>	N/A
	<b>Goals Supported</b>	Provide Decent Affordable Housing
	<b>Needs Addressed</b>	Create and Preserve Affordable Rental Housing
	<b>Funding</b>	HOME: \$3,558,963 HTF: \$2,830,350
	<b>Description</b>	This project will fund new rental construction with program income funds only.
	<b>Target Date</b>	3/31/2029
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	30 Units of HOME and/or HTF funded rental housing units targeting low, very low, and/or extremely low-income households.
	<b>Location Description</b>	Idaho
	<b>Planned Activities</b>	Multifamily Rental - New Construction
11	<b>Project Name</b>	HOME TBRA ( <i>Not funded in 2025.</i> )
	<b>Target Area</b>	N/A
	<b>Goals Supported</b>	Provide Decent Affordable Housing
	<b>Needs Addressed</b>	Create and Preserve Affordable Rental Housing
	<b>Funding</b>	N/A – <i>Not funded in 2025</i>
	<b>Description</b>	HOME TBRA will be funded in future years to provide rental assistance to low-moderate income households.
	<b>Target Date</b>	TBD
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	TBD
	<b>Location Description</b>	Idaho
	<b>Planned Activities</b>	Tenant-based rental assistance for low-moderate income households.
12	<b>Project Name</b>	<b>2025 Single Family - Homebuyer - DPCC</b>
	<b>Target Area</b>	N/A
	<b>Goals Supported</b>	Provide Decent Affordable Housing



	<b>Needs Addressed</b>	Create Affordable Homeownership Opportunities
	<b>Funding</b>	HOME: \$ 4,488,538
	<b>Description</b>	This Project will provide downpayment assistance and closing costs for low to moderate income homebuyers.
	<b>Target Date</b>	3/31/2029
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Twenty-five (25) Low-income Households
	<b>Location Description</b>	Idaho
	<b>Planned Activities</b>	Downpayment assistance and closing costs.
<b>13</b>	<b>Project Name</b>	<b>2025 HTF Administration</b>
	<b>Target Area</b>	N/A
	<b>Goals Supported</b>	Provide Decent Affordable Housing
	<b>Needs Addressed</b>	N/A
	<b>Funding</b>	HTF: \$300,000
	<b>Description</b>	Administration of Program
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	Idaho
	<b>Planned Activities</b>	N/A

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?**

No.

**State's Process and Criteria for approving local government revitalization strategies**

N/A

## 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**

**HOME and Housing Trust Fund (HTF)** - See Unique Appendices

**Emergency Solutions Grant (ESG)** - For community planning and development (CPD) program administration purposes, Idaho is divided into seven regions. See Unique Appendices for a map with the regional break-down.

The following notes the percentage of the population at or below poverty level, using the regions described above:

Region 1: 13%

Region 2: 15%

Region 3: 14%

Region 4: 15%

Region 5: 14%

Region 6: 14%

Region 7: 11%

As reported in the most recent census date for Idaho (census.gov) in 2023, Idaho’s population is 92.6% White, and Hispanic or Latino residents comprise the largest ethnic minority group, at 13.5% of the population. As of the 2021 data, the majority of Hispanic residents, 61%, reside in metro as opposed to rural counties, and disproportionately reside in the southern part of the state, with the greatest concentration of Hispanic residents living in Regions 3 and 7.

While Idaho has no racially or ethnically concentrated areas of poverty (areas of very high poverty and racial and ethnic minorities), there are neighborhoods with more than 50% non-white Hispanic residents and high rates of poverty (between 23-37%). These areas are found within and near cities in Regions 3, 4 and 5.

### Geographic Distribution

Target Area	Percentage of Funds
N/A	N/A

**Table 51 - Geographic Distribution**

## **Rationale for the priorities for allocating investments geographically**

**ESG** - Funds are distributed across the seven regions through a competitive application process, as described in AP-30. Final awards are based on a total application score, of which 20% is based on regional need. The regional need formula is calculated using four, equally weighted factors:

- Percentage of Idaho population
- Median rent-to-income ratio
- Percentage of population at or below poverty level
- Number of individuals experiencing homelessness

The usage of this formula currently reveals the following need break-down (minus IHFA admin):

Region 1: 16%

Region 2: 10%

Region 3: 18%

Region 4: 3%

Region 5: 15%

Region 6: 3%

Region 7: 20%

Because there are other factors considered during the award allocation, there is a slight (up to 8%) variance between the regional need and regional allocation.

## **Discussion**

None.

## Affordable Housing

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

**Introduction:**

The numbers below will 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. Goals will be based on final allocation amounts and the annual per unit subsidy limits that are available at <https://www.idahohousing.com/federal-programs/home-program/>. IHFA expects HOME to apply 90% of the awarded allocation for downpayment assistance/closing costs and 100% of receipted 2024 Program income for multi-family rental housing construction, and 90% of the HTF allocation on housing projects. That amount will then be used based on allocation priorities.

ESG's goal of 220 individuals for Homeless and Rental Assistance in the tables above corresponds with the number of individuals assisted with ESG TBRA. HOME/HTF will construct 30 units of housing and assist 25 households with financial assistance to purchase a single-family housing unit.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	220
Non-Homeless	55
Special-Needs	0
Total	275

**Table 52 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	220
The Production of New Units	30
Rehab of Existing Units	
Acquisition of Existing Units	25
Total	275

**Table 53 - 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 2025. The 25 units under

acquisition of existing units related to downpayment assistance for homebuyers.

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

### **Introduction:**

Idaho Housing and Finance Association (IHFA) administers the Section 8 Housing Choice Voucher (HCV) program in 34 of 44 Idaho counties and encourages housing programs statewide, as IHFA is only one in a statewide network of 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 actively apply for additional voucher funding when available and appropriate for its program.
- To provide more housing opportunities for voucher holders, IHFA will continue to assess opportunities to develop additional PBV projects in 2024. These projects may be limited to certain targeted populations such as persons with disabilities, veterans, or persons experiencing homelessness.
- IHFA will continue to administer the Section 8 Housing Choice Voucher Homeownership program, which is currently available only to disabled households and elderly households. This will expand to qualified households in the Family Self-Sufficiency (FSS) Program, as well, when Housing Opportunity Through Modernization Act (HOTMA) regulations go into effect. To date, forty four (4) participants have successfully purchased a home using IHFA's Section 8 Housing Choice Voucher Homeownership program, which can 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 to encourage participation in a Resident Advisory Board in each area that has an IHFA branch office that administers Housing Choice vouchers.

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

IHFA's rental assistance program is not designated as troubled and currently maintains a designation as a High Performer per HUD definitions and recent Section 8 Management



Assessment Program (SEMAP) scores.

**Discussion:**

None.

## 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**

To execute outreach efforts across the Balance of State Continuum of Care (BoS CoC's) broad geographic area, which spans 82,582 square miles, the recipient leverages partnerships with nonprofit organizations throughout Idaho. In the upcoming years, the IHFA recipient will continue to support these agencies in their efforts to ensure persons experiencing unsheltered homelessness are identified and assessed. Many agencies utilize staff, advocates, and volunteers to provide outreach efforts. Agencies also leverage partnerships with organizations including school districts, law enforcement agencies, healthcare providers, parks and recreational departments, libraries, food pantries, emergency shelters, and others to facilitate outreach efforts. (A COC is a local or regional planning body that coordinates funding and services for people experiencing homelessness, aiming to end homelessness and provide stable housing and support. A BoS COC is a system, often encompassing rural areas and smaller cities, that addresses homelessness by coordinating efforts to provide housing and services, often in areas not covered by other COCs.)

Outreach is conducted during the annual Point-In- Time (PIT) Count through identification of those experiencing unsheltered homelessness in geographically diverse locations. Partner agency staff and PIT count volunteers are trained to “meet” individuals experiencing homelessness where they are physically located and to assess their level of readiness to engage in services. During initial conversations, representatives provide helpful information based on an individual’s specific need.

The recipient will continue to administer the Coordinated Entry system, which ensures homeless persons are directed towards the resources that have the highest likelihood of reducing their extent of homelessness, or diverted from homelessness altogether. Using a consistent and well-coordinated approach, the process relies on streamlining access to housing assistance, screening applicants for eligibility, 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. To reach people least likely to seek homelessness assistance, the recipient works in collaboration with the Idaho Department of Health and Welfare’s 211 Care Line, Health and Welfare Navigators, Regional Coalition members,

United Way's FindhelpIdaho.org, and PATH peer specialists to ensure people throughout the CoC's geographic area are aware of, and have access to, the Coordinated Entry system.

In addition to the outreach efforts above, the BoS CoC has created compensated subcommittees to gather information from adults and youth with Lived Experience (LE) of unsheltered homelessness. These subcommittees are the Lived Experience Panel (LEP) and the Youth Action Board (YAB). Between the two subcommittees, there are more than 35 representatives across all six regions of the BoS CoC that provide LE feedback on outreach and resources to the continuum. Many CoC policies and governing documents have been revised by members of the LEP and YAB.

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

Although ESG funding awards can vary year to year, roughly 45% of annual ESG funding is allocated to emergency shelters. During the last grant term, of the 14 emergency shelters receiving funding in Idaho, five (5) focused on domestic violence survivors, two (2) focused on runaway/homeless youth, and one (1) focused on veterans. Representatives from the subrecipients managing these shelters, as well as representatives from transitional housing agencies not funded through ESG, participate in Regional Coalition meetings. Coalitions provide a forum for the recipient, subrecipients, and other community stakeholders to collectively address needs of homeless persons. Regional Coalition meetings continue on a monthly or quarterly basis.

Qualitative data on emergency shelters and transitional housing programs is gathered through the Lived Experience Panel (LEP), comprised of individuals with lived experience (LE) of homelessness, many being participants in ESG emergency shelter projects. LE feedback is also gathered via annual CE participant surveys, wherein the BoS CoC gains feedback from participants regarding how they feel they have been treated by CE agencies.

Throughout the year, the recipient collects and analyzes data to gain a better understanding of the needs among individuals utilizing emergency shelters and transitional housing in Idaho. This data also informs decisions pertaining to the Coordinated Entry system.

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

## **recently homeless from becoming homeless again**

The Idaho BoS CoC provides grants to 12 permanent supportive housing (PSH) projects throughout the state. In addition, the CoC and ESG programs fund 16 rapid rehousing (RRH) projects. Many of these projects employ a housing specialist, who works with landlords to facilitate access to affordable housing within the community.

Subrecipients that receive ESG and CoC funding are required to use a Coordinated Entry system for housing prioritization. Coordinated Entry utilizes Access Points to administer assessments. Through this system, individuals experiencing chronic homelessness are prioritized. This is further refined by prioritizing subgroups, including households with pregnant members, individuals within the justice system, survivors of domestic violence, youth, households with children, and households with persons aged (62) and older. Assessments also identify if a client has recently left a mental or physical health facility, and ensure they receive the appropriate supportive housing. Through Access Points, those at risk of homelessness are referred to agencies engaged in homelessness prevention services.

Additionally, the BoS CoC has two lived experience (LE) of homelessness subcommittees: the Lived Experience Panel (LEP) and the Youth Action Board (YAB). The LEP and YAB are statewide groups designed to integrate the feedback of individuals and families with LE. The LEP and YAB have input on the CE assessment rating and ranking scale. Additionally, they share how to improve the transition to PSH programs. There are currently more than 35 members between the two subcommittees.

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

The BoS CoC continues 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 guide this work:

1. The recipient will, over the next five (5) years, 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 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. The recipient will continue, over the next five (5) years, to strengthen relationships with school systems and the foster care system in Idaho to prevent homelessness among youth aging out of foster care. The recipient received Youth Homeless System Improvement (YHSI) funds in order to build capacity to increase partnerships with these entities and other stakeholders in youth homelessness prevention and response. They also received Youth Homeless Development Planning (YHDP) grant funding to assist youth exiting the foster care system transition into more permanent housing.

3. The recipient will continue to let the Youth Action Board (YAB) lead YHSI and YHDP initiatives. The YAB is comprised of many youths who have exited foster care, corrections programs, and other institutions or have exited from homelessness. The YAB use their insight to guide program development and keep other youths from experiencing homelessness.

4. Over the next five (5) years, the recipient 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 59% of the ESG funding not associated with shelter activities is used to fund Homelessness Prevention or Rapid Rehousing (RRH) efforts. This funding allocation will remain fairly 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 next five (5) years, the recipient 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 to appropriate programs as they are available.

**Discussion**

None.

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

### **Introduction:**

A barrier to affordable housing in an action, omission, or decision (1) taken because of race, color, religion, sex, disability, familial status, or national origin (referred to as protected classes) that restrict housing choices or the availability of housing choices, (2) that have the effect of restricting housing choices or the availability of housing choices based on a protected class, or (3) that constitutes or contributes to a denial of housing. Beyond basic education and outreach, any recipient of federal funds from the U.S. Department of Housing and Urban Development must document actions that ‘affirmatively further fair housing.’ The State’s 2022-2027 Analysis of Impediments to Fair Housing (AI) provides an overview of impediments to housing access and fair housing compliance. The AI also sets forth action steps to address these impediments over the next five years. These impediments and actions are summarized below.

### **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**

Below are key impediments and corresponding broad action items identified in the 2022-2027 AI. These actions will be carried out during the period of this Consolidated Plan to address barriers to affordable housing.

***Impediment No. 1:*** Many Idaho workers earn low wages that have failed to keep pace with housing cost increases and some residents remain unemployed despite a strong labor market. These residents face persistent cost burden.

Action item No. 1: Address workers’ and residents’ housing needs through incentives, funding, and technical assistance.

***Impediment No. 2:*** Housing needs persist—and disproportionately affect persons with disabilities and racial and ethnic minority households.

Action item No. 2a: Reduce disparities in housing needs among persons with disabilities and racial and ethnic minority households.

Action item No. 2b: Increase the number of accessible and visitable housing units and accessible neighborhoods for persons with disabilities.

***Impediment No. 3:*** Idaho’s regulatory stance on laws affecting affordable housing does not actively facilitate housing production.

Action item No. 3: Support legislative efforts to expand housing choice.



## AP-85 Other Actions – 91.320(j)

### **Introduction:**

This section discusses other actions under each of the funded programs in this Consolidated Plan.

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

**Emergency Solutions Grant Program (ESG)-** Like many locations throughout the United States, Idaho is experiencing a lack of available rental units. To address this obstacle, the recipient is devoting additional resources to ESG homelessness prevention programs. These programs help individuals and families remain in their current home and avoid the need to find a new rental unit in this competitive market. The recipient is encouraging subrecipients to fund positions for housing specialists, who can focus on building relationships with landlords and support housing mediation.

In conjunction with the lack of housing inventory, available housing is unaffordable for many individuals and families, causing a rise in first time homelessness. The recipient is addressing this obstacle by allowing subrecipients to utilize rent reasonableness standards, versus fair market rent values. By utilizing rent reasonableness standards, subrecipients are able to pay a competitive rent and either keep clients housed or find reasonable accommodations.

The recipient oversees ESG funding for the entire state of Idaho. This expansive and diverse geographic area can sometimes lead to obstacles regarding communication and consistency. In order to overcome this challenge, the recipient requires all ESG subrecipients to participate in regional housing coalition meetings and/or HIC subcommittees. These meetings provide the recipient with a forum to disseminate important information while gaining insight into local communities. The recipient also provides technical assistance to subrecipients throughout the year. Housing roundtables, hosted by IHFA, are one more opportunity to improve communication and consistency among housing stakeholders.

**HOME and Housing Trust Fund (HTF)-** Statewide affordable housing strategies to meet underserved permanent housing needs include the creation and preservation of permanent affordable rental housing throughout Idaho. IHFA will publish a notice of funding availability for multifamily rental activities as program income is available and will transition to a rolling application towards the end of 2025, early 2026.

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

**ESG -** The Idaho Balance of State Continuum of Care (BoS CoC) 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 providers are also included in the CoC's efforts.

#### **HOME and HTF-**

1. IHFA will conduct rental housing compliance monitoring and on-site inspections as required at §92.504 and §93.404. This will include tenant files and other documentation to help determine the property remains in compliance with specific program rent limits, income limits, and lease requirements. Rental projects will also be monitored for compliance with applicable federal, state, and local laws and regulations, i.e. lead-based paint disclosures, affirmative marketing plans, language access plans, fair housing, and Section 504, and LEP. IHFA will conduct annual financial risk assessment on HOME and HTF-assisted multifamily rental properties with 10 or more HOME and/or HTF assisted units, and additional financial oversight as required by HUD. IHFA will take appropriate action(s) when necessary to bring an assisted project back into compliance as described in the project's written agreement with the owner.
2. Fifteen (15) percent % of the annual per capita tax credit will be set-aside for the rehabilitation of existing federally assisted rent-restricted developments and/or for the new construction of developments financed or guaranteed by USDA Rural Development. For rehabilitation developments the scope of the rehabilitation must meet the per unit hard cost requirements identified in Section 4.17 of the LIHTC QAP. The set-aside will be available on a statewide basis during the August Application Round, if sufficient applications are received. Otherwise, it will be available for all other qualified non-targeted applications.
3. HTF project applications will receive additional scoring points if the proposed project currently has project-based rental assistance or other mechanisms in place to help ensure long-term affordability.

#### **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 Environmental Protection Agency (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 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 rule.
- 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 five (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 are free of cash welfare assistance, the family is eligible to graduate the program successfully and is awarded their escrow earnings. HOME funds will be made available to assist income eligible households with downpayment assistance.

**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 up to \$2,000 at a two-to-one match, which upon successful completion of the program, provides up to \$6,000 for down payment and closing cost assistance through the

Home Partnership Foundation. HOME funds will be made available to assist income eligible households with downpayment assistance.

**HOME/Community Development Block Grant (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. APEX Accelerator procurement center 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 includes providing on-going technical assistance, application workshops, grant trainings, and presentations to potential grantees.

**ESG** - Three gaps/weaknesses were identified in the con plan, SP-40:

1. A lack of services targeting individuals with HIV/AIDS - IHFA's HOPWA program is being dissolved and will be concluded in May of 2024. Although a thorough search was done to find a replacement recipient of HOPWA funds who would have the administrative capabilities of running the program, none was found. Of the sponsor projects left in the program, each has begun the process of formulating transition plans for participants served in the program. Each sponsor has been transitioning participants off the funding sources, and IHFA, who administers TBRA under the program (which accounts for the greatest amount of funding), has transferred those receiving rental assistance to other qualifying programs.
2. A lack of services which promote education and career growth among individuals experiencing homelessness was one issue. The recipient partners with subrecipients throughout Idaho who are responsible for providing localized services to children experiencing homelessness or at risk of homelessness. Through outreach efforts, agencies collaborate with education providers to ensure local needs are being met. Agencies work with school districts, colleges, Head Start, Early Start, the Youth Action Board (YAB) and parenting education programs. The Balance of State (BoS) Continuum of Care (CoC) Board also includes representation from the Department of Education. Subrecipients create housing stability plans and case managers work with families to assess employment goals, employment history, current income level, strengths supporting income goals, barriers to income goals,

training and education needs, and other factors to develop an action plan. Families are assisted in completing budgets (current and projected) to assist in scoping employment goals and identifying community resources that would assist overall financial stability. Subrecipients also support individuals' career growth. Case managers identify potential employment training and support organizations. Case managers work with clients to contact employment support organizations and gather information to link services with need accurately. The agencies work with a wide range of employment organizations to decrease barriers to employment and assist clients in skill development or to obtain certifications. Common partner agencies include the Idaho Department of Labor, vocational rehabilitation services, GED programs, local colleges and universities, and other skills development programs.

1.

3. Another gap identified was the lack of rental units available to individuals and families experiencing homelessness. To address the lack of available rental units, the recipient is devoting additional resources to ESG homelessness prevention programs. IHFA also administered a housing preservation program to help individuals and families affected by COVID-19, which has ended. These programs help individuals and families remain in their current home and avoid the need to find a new rental unit in this competitive market. The recipient encourages subrecipients to fund positions for housing specialists, who can focus on building relationships with landlords and also support housing mediation.

**HOME/HTF** will continue to provide technical assistance as needed to help HOME project developers for the development of compliant rental housing.

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

**ESG** - 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 like:

- The Housing Coordination and Policy Forum ([www.ihfa.org/research\\_hirc\\_forum.asp](http://www.ihfa.org/research_hirc_forum.asp))
- Rural Forums
- The Idaho Community Review ([www.idahocities.org](http://www.idahocities.org) )
- Idaho Homelessness Coordinating Council
- Idaho's ADA Task Force
- Coalition for Idahoans with Disabilities
- Idaho Hispanic Profile Project
- 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 BoS CoC has been awarded a HUD CoC planning grant. The planning grant is intended to aid CoCs 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. This enhances coordination in the implementation of the jurisdiction's consolidated plan among stakeholders.

The recipient hosts biannual housing roundtables, which enhance coordination between public and private housing and social service agencies. These events facilitate communication and build strong partnerships among housing stakeholders, including representatives from public and private agencies, business and civic leaders. Input gained in these public forums is utilized when developing policies, performance standards, and program evaluation.

**Discussion:**

None.

## Program Specific Requirements

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

#### Introduction:

This section reviews specific requirements of the programs funded under this Annual Action Plan.

**Community Development Block Grant Program (CDBG)** will spend 70% LMI activities for a two-year period. This two (2) -year period would be 2025 and 2026.

**HOME & Housing Trust Fund (HTF) Programs-** The IHFA's 2025 Annual Administrative Plan outlines programs for single-family and multifamily activities, including financing, regulatory requirements, and the award and funding process is available 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        |
| <b>Total Program Income:</b>   | <b>0</b> |

#### Other CDBG Requirements

- |   |         |
|---|---------|
| 1. The amount of urgent need activities | 300,000 |
|---|---------|

2. The estimated the percentage of CDBG funds that will be used for activities benefiting persons of low and moderate income, ensuring that over a consecutive period of one (1), two (2), or three (3) years, at least 70% of the funds provide an overall benefit to this group. The specific years covered should include this Annual Action Plan.

70.00%

**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 Integrated Disbursement Information System (IDIS) Completion date (the date entered in HUD's 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.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

N/A

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

N/A

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

Current Permanent Rental Housing Tenant Preference Populations identified in the State of Idaho Five-Year Consolidated Plan are:

- o Elderly (minimum of one household member  $\geq$  age 62)
- o Disabled (minimum of one household member)
- o Household Annual Gross income  $\leq$ 30% AMI

### **Emergency Solutions Grant (ESG)**

#### **Reference 91.320(k)(3)**

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

The Idaho BoS CoC has developed the attached written standards which provide guidance for CoC and ESG funded programs. These written standards have been established to ensure that persons experiencing homelessness, or who are at risk of homelessness, will be given

consistent support and services. The majority of the standards within the written standards are based on the CoC, ESG, and/or the HEARTH Interim Rules. The written standards are not intended to be used in lieu of the interim regulations for the HEARTH Act; rather, they are intended to establish and clarify local decisions regarding program administration.

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 a variety of factors, including:

- Length of Time Homeless
- Whether a client is fleeing DV
- Age (If they have young children in the home OR are pregnant, OR have a teen in the home.)
- Accessing Emergency Services in the last six months, and
- How many times arrested, incarcerated or had run-ins with the police in the last six months and

Clients in need of housing are placed on a centralized, regional queue to ensure those who are most vulnerable receive assistance first. The CoC works in collaboration with the statewide 211 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 Crisis Needs 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 to remain housed without the use of homelessness assistance resources. The next step is the Housing Assistance Assessment. Clients who are at risk of homelessness leave the Housing Assistance Assessment and continue through the process with a Homelessness Prevention Assessment.

1. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations). The process for awarding funds to organizations (including community and faith-based) is described fully in AP-30. In summary, private and nonprofit organizations may submit an application during the open competition. In addition to the application, applicants must submit supporting documentation, such as financial statements and policies/procedures. Organizations must also agree to certain conditions and submit a budget proposal.

Applications are scored based on the following: agency narrative, project narrative, regional allocation, financial stability, match ability, and grant outcomes (renewal grants). Grant proposals are funded based on the application score and ranking. Conditional awards are issued to subrecipients. Once a contract is signed and the budget is finalized, the subrecipient may begin submitting draw requests for eligible expenses incurred within the grant cycle.

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

The ESG recipient supports the BoS CoC's structure, which reserves a seat on the board for an individual who is currently experiencing homelessness or has experienced homelessness in the past seven years. Additionally, all ESG and CoC subrecipients are required to include an individual with lived experience (LE) of homelessness on their board, or in another policy-making capacity.

3. Additionally, the BoS CoC has two homeless lived experience (LE) subcommittees: the Lived Experience Panel (LEP) and the Youth Action Board (YAB). The LEP and YAB are statewide groups that integrate the feedback of individuals and families with LE in all decisions made by the CoC that directly impact the homeless population, including ESG project funding allocations. Describe performance standards for evaluating ESG.

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

- Reduce the 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. (Homeless Prevention (HP) projects apply.)
- Shorten the 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. (Emergency Shelter (ES) projects apply.)

- 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. (Rapid Rehousing (RRH) projects apply.)
- 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. (All ESG projects apply: ES, RRH, HP)

**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

- CPA audited financial statements. For prior year-end, CPA audited financial Statement is not required if the entity is newly formed. The HOME Department will use the financial statement to help determine if the recipient has adequate financial management systems and practices in place, and sufficient financial resources to carry out the project to completion, including positive net income for the most recent year end.
- Capital Needs Assessment for all acquisition and/or rehabilitation activities.
- Exhibit S- Site Selection and Environmental Checklist. Previously, submission of this form was recommended, but is now required as part of the application.
- Language Access Plan for Limited English Proficient (LEP) Persons. See chapter 6 for LEP requirements.
- Section 3 and MBE/WBE Developer Plan.
- Independent third Party Capital Needs Assessment- Required for all projects.
- Operating Costs – Minimum operating costs per unit per year benchmarks.
- Market Study. See Exhibit M for requirements
- 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). Resolution should be no more than 5 years old. Refer to Chapter 6 and Exhibit F for requirements that should be included in resolution. If the local government does not have an affirmatively furthering fair housing plan, the developer may adopt action's to support IHFAs AI.
- Fair Housing Requirements. If the proposed activity will be located in a CDBG Non-Entitlement area, then 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 will be located in a CDBG Entitlement Area (Boise, Nampa, Meridian, Lewiston, Coeur d'Alene, Idaho Falls, Caldwell, and Pocatello, and Twin Falls), submit that city's most recent Analysis of Impediments To Affirmatively Further Fair Housing.
- Evidence the recipient has the experience and capacity to begin construction within 12 months and complete the project within a reasonable time period. A narrative should be included in the application detailing the experience and not just a list of past projects and

resumé.

- 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
- Green Standards. Must meet one of four Green Building Design Standards or certifications: Energy Star, LEED, Enterprise Green Communities, and/or IHFA Green Building Standards. Once the standard is selected the proposed project may not change the standard.
- Request for Release of Information. To all/any outside agencies the recipient has an active project(s)
- Pro forma. All operating costs and revenues must be in sufficient detail to compare line items against properties that are similar in physical type and size, so that the HOME Department may determine whether the planned expenditures are sufficient and reasonable.
- Minimum Match Requirement of 10% requested loan amount-HOME Only.
- Subsidy Layering sheet.
- Funding Commitments. To receive the points, the application must include a written commitment from **all** proposed funding sources (excluding HOME, HTF, and LIHTC). An application that does not include evidence of commitments will not be underwritten and be deemed incomplete.
- Project Narrative Description.

**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), geographic diversity, 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, additional units over minimum required, 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 three (3) Pts if Project is located in an Opportunity Incentive Area

The project site is located in an “Opportunity Incentive Area.” *(Meaning it is 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 Persons 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”.**

The Minimum Threshold requirement is described in 3b above.

**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 three (3) pts

The project has project based-rental assistance or other mechanisms that ensure affordability. If using vouchers a contract must be signed and in place to receive points.

**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”.**

No point selection criteria for extending past the thirty (30)-year Period of Affordability. Financial feasibility is reviewed to ensure projects successfulness through the lifespan of all funding

sources within the applicant's proforma.

**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 three (3) units) for two (2) of the three (3) Priority Housing Needs categories below, as identified in the Consolidated Plan. Three (3) pts.

- ≤30% AMI (families or individuals)
- Elderly (at least one member of the household is aged sixty two (62) and older.
- Disabled. Two (2) pts per identified preference.

**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.). The Minimum Threshold requirement is described in 3b above.

**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 limits... In determining the most appropriate maximum per-unit subsidy limits for the HTF program, 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; Capital Needs Assessments (if applicable); and broadband infrastructure (if applicable).

The HTF Rehabilitation Standards are available online in the 2024 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% 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".

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 (2025-2029) 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

HOME & HTF Programs

IHFA may consider refinancing of existing debt if the debt was not made or insured by any Federal Program (CDBG, USDA-RD, VA, HUD-202 or 811 or 221(d)(4), PHA Capitol Fund, FHA), and substantial rehabilitation will be the primary activity. Activity is eligible within Idaho, except the City of Boise.

Requirements:

- 1) Refinancing is necessary to permit the continued affordability of the project;
- 2) Affordability period is no less than fifteen (15) Years;
- 3) A review of the owner's financial and property management practices clearly demonstrates there was no disinvestment in the property;
- 4) Feasibility of serving the current target population over an extended period is demonstrated by pro forma;
- 5) Substantial rehabilitation of all units and tenant common areas is necessary as demonstrated by a Physical Needs Assessment.
  - a) "Substantial Rehabilitation" defined as  $\geq$ \$25,000 per unit in hard rehabilitation costs. "Hard" rehabilitation costs for this activity are defined as site work, physical improvements, and construction contingency.
- 6) CNA must meet the following requirements:
  - a) Assessment must be conducted or updated within the previous six (6) months;
  - b) Assess the physical condition of all major systems, structures, units, and tenant common areas;
    1. Identify any major system with a useful remaining life of less than fifteen (15) years. Any system with less than a fifteen (15)-year useful remaining life must be replaced as part of the rehabilitation project:
  - c) Prepared by an independent architect/engineer who is licensed and certified by the State of Idaho;
  - d) Architect or engineer must certify the PNA is an accurate assessment of the entire property and includes an assessment of the items needed to comply with the Property Standards:

Property Standards- State of Idaho's building codes, applicable local property standards and ordinances, Uniform Physical Condition Standards (UPCS), applicable federal crosscutting regulations (Fair Housing Act, Section 504, ADA, UFAS, HUD Lead Safe Housing Rule) and ASHRAE 90.1 for Multifamily buildings.

CNA Inspectable Components:

1. Site (Topography, drainage, pavement, curbing, sidewalks, parking, landscaping, amenities, water, storm drainage, gas and electric utilities, playground, site furniture, irrigation system);
2. Assess potential impact of natural disasters (e.g. earthquake, flooding, wildfires, drought) in accordance with state and local code;
3. Estimate the useful remaining life of all "Major Systems" and components based on current age and condition. "Major Systems" are defined as structural support, roofing, cladding and weatherproofing, plumbing, electrical, heating, and air conditioning.
4. Exterior walls, balconies, exterior doors and windows, roofing system and drainage;
5. Interior finishes of all units and tenant common areas (carpeting, vinyl tile, plaster walls, paint condition, etc.), unit kitchen finishes and appliances, unit bathroom finishes and fixtures; and
6. Lobbies and corridors

CNA Must Also Address the Following:

- Critical Repair Items- (Any health and safety deficiencies/violations of building code and local property standards/code that require immediate remediation).
  - On-site inspection- (All units and tenant common areas.)
1. Identify all physical deficiencies based on (i) visual inspection and survey, (ii) review of pertinent documentation, and (iii) interviews with the property owner, management staff, tenants, community groups, and government officials;
  2. Explain how the Project will meet handicap accessibility requirements;
  3. Identify physical obstacles and describe methods that can be taken to make the project accessible;

4. Prepare a Scope of Work that follows the HOME Rehabilitation Standards See Admin Plan Exhibit C;

5. Determine the cost/benefit of each significant work item in the rehabilitation plan (items greater than \$5,000) that will reduce operating expenses and/or tenant expenses (e.g., individual utility metering, extra insulation, thermopane windows, and setback thermostats).