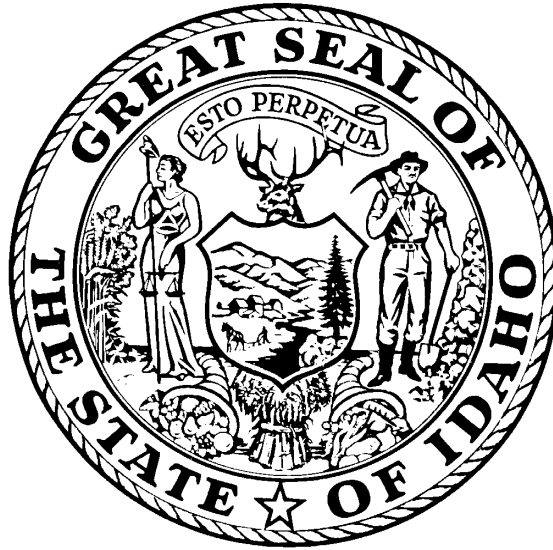


**Idaho's Federal Community Development and Affordable Housing Programs  
2020-2024 Five-Year Consolidated Plan & 2020 Action Plan**



**Idaho Housing  
and Finance**  
Association

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## Executive Summary

### ES-05 Executive Summary - 91.300(c), 91.320(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. They are the Community Development Block Grant (CDBG), the Emergency Solutions Grant (ESG), the HOME Investment Partnerships Program (HOME), and the Federal Housing Trust Fund (HTF).

As State Grantees of these HUD-CPD programs, Idaho Housing and Finance Association (IHFA), 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 AP is submitted to HUD within 60 days of notification from HUD of allocation amount. 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. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

Response exceeds maximum number of characters, please refer to Unique Appendices

### **3. Evaluation of past performance**

Response exceed maximum number of characters allowed, please refer to Unique Appendices.

### **4. Summary of citizen participation process and consultation process**

IDC and IHFA held a pre-drafting 30-day comment period for the public and stakeholders to provide the opportunity for input prior to drafting the Plan. Following the drafting of the Plan, a second 30-day public comment period is required to receive comments on the Draft Plan. Comments received during the pre-draft comment period are not included herein.

The Legal Notices for both comment periods was published on major Idaho newspapers. A copy of the notice was emailed to local, regional, state level stakeholders, including continuum of care within the state, public housing authorities, state agencies, entitlement cities, major public libraries, IHFA branch offices. English and Spanish versions of the notices were posted on the IDC and IHFA websites.

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

No comments received; No public hearing attendees

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

N/A

### **7. Summary**

No Response required.

## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.300(b)

#### 1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

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

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

Table 1 – Responsible Agencies

#### Narrative

##### Consolidated Plan Public Contact Information

CDBG Program- State of Idaho Department of Commerce-Dennis J Porter, Manager 208-287-0782 Email: dennis.porter@commerce.idaho.gov

HOME Program- Idaho Housing and Finance Association- Laura M. Lind laural@ihfa.org 208-331-4792

ESG Program- Idaho Housing and Finance Association- Lisa Steele Lisast@ihfa.org 208-331-4839

## **PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.200(I) and 91.315(I)**

### **1. Introduction**

In preparation for the consolidated planning process, IDC and IHFA conducted a statewide housing needs survey and a community development needs survey. Published notices invited the public to go online and participate in the anonymous housing needs survey. The notice was mass emailed to public, assisted, and special needs housing providers, special needs and homeless service providers, disability centers and advocates, fair housing advocates, affordable housing owners, developers and management, mortgage lenders, public and private agencies, CHDOs, Section 8 landlords and PHAs. The survey results and the commissioned report were posted online on IHFA's and IDC's websites prior to the pre-drafting citizen participation process. In addition, Federal housing administrators, Idaho Department of Health and Welfare, local units of government, and stakeholders were consulted during the pre-drafting and drafting process as applicable

### **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 (91.215(I))**

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



CoC. Resources targeting and leveraging are also discussed to ensure access priorities mirror HUD's goals for special populations.

The QAP continues to include language that allows a set aside up to 10% of the annual per capita tax credit amount to address special housing need populations including homeless veterans. If IHFA does not utilize this set aside if qualified applications are not received, the set-aside will be made available to other qualified non-targeted applications. Specific guidelines will be included in the NOFA.

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

The Strategic Planning Committee addresses the needs of the CoC regarding housing types across the CoC. This committee establishes benchmarks for percentages of new beds both for PSH and chronically homeless designations. The Committee develops benchmarks in regards to HUD's system performance measures, which address the subpopulations of chronically homeless individuals and families, families with children, veterans, unaccompanied youth, and persons at risk of homelessness. Prioritization decisions are made in the Coordinated Entry Committee, and incorporated into the Written Standards. IHFA also has contacts with foster care programs at the ID Dept. of H&W, and new relationships with RHY funded providers. All ESG and COC applicants are asked to address the following questions in each annual application: "are proposed project policies and practices consistent with the laws related to providing education services to homeless individuals and families?"; and "Does the project have a designated staff person to ensure that homeless children are enrolled in school and receive educational services as appropriate?" These questions are scored, and agencies are required to have policies in place at the time of funding. The COC monitors agencies receiving ESG and COC funds to ensure these policies are in place. Coordination between homeless housing and services providers and school district homeless liaisons occurs frequently, and each educates the other about qualifications and services available. This serves to maximize funding and impact for homeless families with children and unaccompanied youth.

The IHCC has made efforts towards not just simply addressing the needs of homeless persons, but to address the needs of persons at risk of homelessness and specific sub-populations therein, which may be more prevalent in various regions of the state. The BoS CoC's Coordinated Entry system includes an Assessment of Barriers to Housing form used by subrecipients. Based on the evaluation performed, homeless persons can be referred to the type of housing that best aligns with their needs and circumstances. IHFA and the BoS CoC's Coordinated Entry system continues to increase the ability to serve the most vulnerable homeless individuals and families first, and more accurately define the State's and each regions' homeless population. Furthermore, the collection of assessments results will allow the Continuum to conduct 'right-sizing' evaluations to ensure resources allocations are proportionate to those served by each program type. Imbalances between outcomes and resource allocation can signify inefficiencies within a particular housing component type. Data collection and

evaluation efforts will continue to grow as outreach efforts encourage collaboration with the BoS CoC to plan, pair resources, and compare data and program outcomes.

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

The State of Idaho has two Continua of Care: one for the Boise City/Ada County, and one for the Balance of State. IHFA, the sole Idaho ESG recipient, serves as the Collaborative Applicant for the Idaho Balance of State CoC. In order to consult with both of Idaho's CoCs to set ESG priorities, IHFA established the Idaho Homelessness Coordinating Committee (IHCC) as a collaborative body, as well as conducting an ESG listening session during the ESG application review process. The 6 Regional Coalitions of the Balance of State CoC are comprised of private, nonprofit, government, and homeless service agencies, who provide valuable insight and needs considerations to the CoC planning body. The planning body then provides consolidated feedback to the ESG recipient.

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

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

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

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

1	<b>Agency/Group/Organization</b>	State of Idaho Dept of Commerce
	<b>Agency/Group/Organization Type</b>	Other government - State Other government - County Other government - Local Regional organization Planning organization Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development non housing community development needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	To better understand Idaho cities and counties non-housing community development needs, the IDC conducted a local government survey. The survey was sent out to 193 cities and 44 counties in June 2019. The survey did have specific questions related to the CDBG program's method of distribution, allocation amounts, and level of need. Of the 237 surveys sent out a total of 123 were received. IDC reviewed the results of the IHFA and Cloudburst housing stakeholder survey that was conduct in January 2019. The survey included questions related to community and economic development. IDC also utilizes and Economic Advisory Council to review IDC and CDBG policies as well as review of CDBG applications. The EAC is comprised of individuals who represent private industry and regularly provide recommendations and advice on public/private partnership and business perspectives.
2	<b>Agency/Group/Organization</b>	IDAHO HOUSING AND FINANCE ASSOCIATION
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Service-Fair Housing Other government - County Other government - Local Public Private Sector Banking / Financing

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The above groups and organizations were asked to provide input through participation in an anonymous statewide housing needs survey prior to the pre-drafting process, and providing input during the drafting process. They were also asked to review the draft plan prior to submission to HUD. PHA's who require a Certification of Consistency from IHFA were asked provide input regarding their affordable housing needs, issues, and concerns, during the drafting process and after the plan was drafted.
3	<b>Agency/Group/Organization</b>	Idaho Balance of State Continuum of Care
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services - Victims Health Agency Child Welfare Agency Publicly Funded Institution/System of Care Other government - State Other government - Local

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs HOPWA Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Through meetings and emails requesting comments regarding funding priority recommendations. Entitlement communities were contacted with a request for comment.
7	<b>Agency/Group/Organization</b>	Idaho Department of Health and Welfare
	<b>Agency/Group/Organization Type</b>	Health Agency Child Welfare Agency Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Lead-based Paint Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Idaho Department of Health and Welfare was consulted regarding the State's program to reduce the number of poverty-level families in Idaho and Lead-based Paint hazard reduction activities, and the State's Anti-Poverty strategies.

### Identify any Agency Types not consulted and provide rationale for not consulting

For purposes of receiving input on homelessness strategies, business leaders were not consulted through direct contact. In our professional experience and interaction as program administrators of multiple federally-funded homeless housing programs and the Collaborative Applicant for the BoS CoC, we have not encountered community business leaders with an heightened awareness of homelessness issues or knowledge of homelessness interventions. However, for those who desire to provide input on the strategies and methodology used to address homelessness issues, the public hearing platform was offered to the public as a whole on two separate occasions.

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

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

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

**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 CoC governing board 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.

PR-15 Citizen Participation -91.115, 91.300(c)

**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 of Idaho conducted two public hearings on housing and community development issues to allow citizens to provide input on the proposed Consolidated Plan. The State provided space for eight (8) in-person focus groups and five (5) remote sessions for input from stakeholders and the public on the development of the Consolidated Plan.

See the PR-15 attachment for a summary of the comments received and discussions had. See Unique Appendices.

## 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	Pre-Draft Public Hearing	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Stakeholders</p>	See PR-15 Attachment	Summary of comments exceeds the allowable characters. See Citizen Participation Attachment @ Pre-Draft Public Hearing Summary of Comments	N/A	



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)
2	Newspaper Ad	Non-English Speaking - Specify other language: Spanish  Non-targeted/broad community	Legal Notices in Idaho's major newspapers regarding two separate 30-day (PRE-DRAFT and POST-DRAFT) comment periods and two public hearings.	See PR-15 Citizen Participation Attachment for proof of publication for both public comment periods and both public hearing.	N/A	
3	Pre-Draft Public Hearing	Persons with disabilities  Disability Action Centers, Fair Housing Advocates, CoC members	email asking for input regarding affordable housing needs for clients. Email included both Spanish and English version of the first (Pre-draft) legal notice.	See PR-15 Citizen Participation Attachment	N/A	

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)
4	Pre-Draft Public Hearing	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Residents of Public and Assisted Housing</p> <p>Affordable housing property management, owners, developers</p>	<p>Mass email sent to Section 8, IHFA Branch Offices(Section 8 Tenant-Based Vouchers), PHAs, HOME, &amp; LIHTC property management/owners. Email included the legal notices in English and Spanish.</p>	See PR-15 Citizen Participation Attachment	N/A	

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)
5	Pre-Draft Public Hearing	Units of local Government	Pre-draft and Post-draft 30-day comment periods. Outreach included the legal notices in English and Spanish version. The public comment notice was also posted on the Commerce website.	See PR-15 Attachment	N/A	<a href="http://www.commerce.idaho.gov">www.commerce.idaho.gov</a>

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)
6	Pre-Draft Public Hearing	State, Regional, Local affordable housing stakeholders	Consolidated Planning consultation and outreach included as an agenda item-IHFA discussed the upcoming Five-Year Consolidated Plan and its planning process. Stressed the importance of providing input regarding each community's housing and community development needs into the drafting process.	No comments	N/A	

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)
7	Pre-Draft Public Hearing	Idaho Department of Health and Welfare	Individual outreach to IDHW personnel regarding the their Lead-based Paint hazard reduction program(s). Individual outreach to IDHW personnel regarding the State's Anti-Poverty strategies. Responses are included in the Consolidated Plan.	Input from IDHW are included in the Lead-based Paint and Anti-Poverty Strategies sections of the Consolidated plan.	N/A	
8	Pre-Draft Public Hearing	Homeless Service providers, and statewide stakeholders	The CoC Board, the IHCC, includes Homelessness Service Providers and statewide stakeholders, throughout the state who provide input on the strategic plan and goals for the CoC.	No Comments.	N/A	

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)
9	Pre-Draft Public Hearing	Idaho Homelessness Coordination Members	An email was sent to all members of the coalition throughout the state asking for their input.	No Comments.	N/A	
10	Pre-Draft Public Hearing	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Residents of Public and Assisted Housing</p> <p>Affordable housing owners, developers, including CHDOs</p>	All public comments are found in the PR-15 Attachment	No comments	N/A	

11	Pre-Draft Public Hearing	Minorities  Non-English Speaking - Specify other language: Spanish  Residents of Public and Assisted Housing	The legal notice was sent by email to the Executive Director of the Community Council of Idaho, with a request to make the notice available to residents and clients. The Council is specifically mentioned because they are Idaho's largest non-profit serving Idaho's Latino population, including healthcare, education and training, workforce preparation, early childhood education, and affordable and homeless housing.	No comment or input was received.	N/A	<a href="http://www.communitycouncilofidaho.org/">http://www.communitycouncilofidaho.org/</a>
12	Public Meeting	Minorities  Non-English	See PR-15 Attachment	See PR-15 Attachment	N/A	

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)
		<p>Speaking - Specify other language: Spanish Speaking</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>				
13	Newspaper Ad	Non-targeted/broad community	See PR-15 Attachment	See PR-15 Attachment	N/A	

**Table 4 – Citizen Participation Outreach**



# Needs Assessment

## NA-05 Overview

### Needs Assessment Overview

The Needs Assessment is a qualitative and quantitative analysis of multiple sets of data, supplemented with interviews and surveys. The needs identified in this section work to inform the State's strategic plan addressing its use of HUD funds. This is done by first identifying the needs through data and consultation with the communities and then prioritizing those needs, given that there are never enough financial resources to fully address each identified need.

The following gives a brief overview of the Needs Assessment results, with more detailed information included in each corresponding section.

### NA-10 Housing Needs

- Renter households are twice as likely to be low- or moderate-income as are owner households. 68% of owner households earn 80% AMI or more, while 34% of renter households earn 80% AMI or more.
- Cost burden is the most significant housing problem for both renter and owner households. Of all renter households, 35% are low- or moderate-income cost burdened households. Of all owner households, 18% are low- or moderate-income cost burdened households

### NA-15 Disproportionately Greater Need: Housing Problems

The following racial/ethnic groups experience disproportionately greater needs considering housing problems:

- Black / African American: 0-30% AMI and 50-80% AMI
- Pacific Islander: 30-50% AMI and 50-80% AMI
- Asian: 80-100% AMI

### NA-20 Disproportionately Greater Need: Severe Housing Problems

The following racial/ethnic groups experience disproportionately greater needs considering severe housing problems:

- Black / African American: 50-80% AMI
- Pacific Islander: 30-50% AMI and 50-80% AMI
- Asian: 30-50% AMI

## NA-25 Disproportionately Greater Need: Cost Burden

The following racial/ethnic groups experience disproportionately greater need considering cost burden:

- Black / African American
- Pacific Islander

## NA-35 Public Housing

- There are currently 4,067 households on the Housing Choice Voucher waitlistIdaho Falls = 1,297Twin Falls = 957Lewiston = 510Coeur d'Alene = 1,303

## NA-40 Homeless Needs

- 86% of all American Indian or Alaska Native populations experiencing homelessness are in an unsheltered situation.
- Of all individuals counted in the 2015 PIT count, approximately 48% were unsheltered

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

### **Summary of Housing Needs**

Response exceeds maximum allowable characters. See Unique Appendices for additional information and tables.

DRAFT

## **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**

According to HUD, disproportionate need refers to any need for a certain race/ethnicity that is more than ten (10) percentage points above the demonstrated need for the total households within the jurisdiction at a particular income level. The tables and analyses below identify the share of households by race/ethnicity and income level experiencing one or more of the four housing problems outlined by HUD guidelines. See Unique Appendices for additional information and tables.

## **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**

According to HUD, disproportionate need refers to any need for a certain race/ethnicity that is more than ten (10) percentage points above the demonstrated need for the total households within the jurisdiction at a particular income level. The tables and analyses below identify the share of households by race/ethnicity and income level experiencing one or more of the four housing problems outlined by HUD guidelines. See Unique Appendices for additional information and tables.

## **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.

See Unique Appendices for additional information and tables.

## **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?**

This section describes the population categories with disproportionate needs, based on the tables above. Disproportionate need occurs when a population category has a rate of housing problems that is at least 10 percentage points higher than the jurisdiction overall or predominant population category.

See Unique Appendices for additional information.

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## **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). According to HUD reports on Public Housing Authorities (PHAs), there are 825 Public Housing units administered by PHAs statewide. Idaho currently has 6,493 households that receive a Section 8 Tenant Based Rental Assistance Voucher (Housing Choice).

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 any public housing.

See Unique Appendices for additional information and tables.

### **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?**

Idaho Housing and Finance Association (IHFA) branch offices maintain data on waitlists by family type, race, ethnicity and disability.

The table located in the Unique Appendices shows the numbers and types of families on the waitlists for tenant based rental assistance.

Public Housing Authority (PHA) Plans for local units of government with their own PHAs were consulted for additional waitlist information. These Plans were dedicated in large part to capital improvement needs and did not contain data on wait lists.



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

People with disabilities are over-represented in the waitlists for Housing Choice Vouchers. These individuals are often single seniors living on very low fixed incomes who cannot afford market rate housing, particularly in Idaho's smaller communities and rural areas, where housing is limited.

#### **Discussion:**

See above

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

### Introduction:

The following tables contain information derived from Idaho's Balance of State CoC 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 individuals and families experiencing homelessness are utilizing resources that available to them. 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, approximately forty eight percent (48%) are unsheltered.

### 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				
Persons in Households with Adult(s) and Child(ren)	247	446	1,251	453	578	107
Persons in Households with Only Children	0	1	0	0	0	0
Persons in Households with Only Adults	343	314	1,664	535	855	54
Chronically Homeless Individuals	79	30	300	68	156	53
Chronically Homeless Families	49	4	263	48	125	99
Veterans	73	51	271	84	117	108
Unaccompanied Child	0	0	200	187	237	0
Persons with HIV	0	0	0	0	0	0

**Table 5 - Homeless Needs Assessment**

**Data Source Comments:** The data contained in the Homeless Needs Table is limited to the information collected and stored within Idaho's HMIS. This data includes both emergency shelter and transitional housing projects, but excludes permanent housing, including rapid re-housing and victim service providers.

Indicate if the homeless population is: Partially Rural Homeless

**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				
Persons in Households with Adult(s) and Child(ren)	0	0	0	0	0	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	0	0	0	0	0	0
Chronically Homeless Individuals	0	0	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	0	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

**Table 6 - Homeless Needs Assessment**

**Data Source Comments:** The data contained in the Homeless Needs Table is limited to the information collected and stored within Idaho's HMIS. This data includes both emergency shelter and transitional housing projects, but excludes permanent housing, including rapid re-housing and victim service providers.

**DV Only**

<b>Race:</b>	<b>Sheltered</b>
White	86
American Indian or Alaskan Native	13
Asian	2
Black or African American	8
Native Hawaiian or Pacific Islander	0
<b>Ethnicity</b>	
Hispanic	18

**Domestic Violence by Race and Ethnicity**

**For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction:**

One measure of homelessness comes from Idaho's annual Point In Time count, which is conducted on the last Wednesday of January each year. The count is executed during a time when all individuals and families who are facing homelessness are utilizing any and all resources that may be available to them. Thus, the statewide 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, approximately thirty percent (30%) are unsheltered. However, the average shelter bed-nights provided- of those agencies, contributing data to HMIS- experienced an average bed utilization rate of fifty eight percent (58%) for the previous ESG reporting year. This may demonstrate either a lack of awareness of, or access to, resources, or a desire to not utilize mainstream resources.

**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):**

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. Individual adults represent the largest group within the categories of becoming homeless and exiting homelessness, with households with adult and children coming in as a close second. Both chronically homeless individuals and chronically homeless families are far behind the leading categories but comprise of similar representation in the becoming homeless and exiting homelessness categories. Households with only youths are not represented in either category.

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

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
White	580	466
Black or African American	13	5
Asian	1	1
American Indian or Alaska Native	11	70
Pacific Islander	6	5
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
Hispanic	101	111
Not Hispanic	0	0

Data Source  
Comments:

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

As indicated in the table above, of the five (5) chronically homeless families and veteran families, only one was unsheltered. Of all chronically homeless individuals and veterans identified in the PIT Count, 72% were unsheltered. Those families that are not chronically homeless are more likely to be sheltered; of those 572 persons in households with adults and children, 35% are unsheltered.

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

The wide majority of those individuals and families experiencing homelessness are White (~90%), which is reflective of Idaho's demographic makeup. The American Indian or Alaska Native population experience homelessness at the second highest rate. Of note, the American Indian or Alaska Native population experiences unsheltered homelessness at a rate higher than other populations.

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

From the table above, 48% of all persons experiencing homelessness are unsheltered. While 86% of all American Indian or Alaska Native populations experiencing homelessness are in an unsheltered situation.

### Discussion:

Some reporting limitations are present, which result from the elements of data collected and reported by homeless service providers. Blacked out cells in the *Nature and Extent of Homeless Table* are an indication that the information has not been collected or cannot be verified as accurate, or if collected, carries severe limitations in its use or completeness.

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

### **Introduction**

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

Persons with special needs include the elderly and frail elderly, persons with severe mental illness, developmentally disabled, physically disabled, persons with alcohol/other drug addictions, and public housing residents. The segments of these populations requiring special housing options have not been quantified. 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.

Of those disabilities listed in the table shown in the Unique Appendices, only the cognitive disability is approximately distributed evenly across age groups. The ambulatory, vision, and hearing disabilities skew heavily towards those individuals over 65-years old.

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

According to the Center for Disease Control and Prevention, 25.6% of adults in the U.S. have some type of disability, compared to 23.1% in Idaho. The 2015 American Community Survey (ACS), estimates that approximately 38,500 Idahoans are physically disabled, older than 16 and live in poverty; suggesting that they have both housing and supportive service needs.

The 2015 ACS estimates that 6,400 seniors aged 65-74 in Idaho lived below the poverty level. These seniors may need housing assistance, ranging from repairs on homes they own to subsidized rental assistance. Another 5,790 seniors aged 75 and older lived in poverty and likely have both housing and supportive service needs.

Based on data maintained by the Substance Abuse and Mental Health Services Administration (SAMHSA), an estimated 2,560 residents in Idaho were served by the Idaho SMHA system and are unemployed. These residents may have limited access to health care to address their needs and are very likely to need both housing and social service supports.

An estimated 108,000 Idahoans struggle with substance abuse. Of these, 97,000 need but are not receiving treatment. SAMHSA estimates that 57.8% of those in Idaho with a mental illness are unemployed, and 9.1% are homeless. The supportive services needs of this population are significant.



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

As of 2018, there was an estimated 1,871 individuals living with HIV/AIDS in the state of Idaho. Of those 1,871 individuals, 84% are male and 78% are non-Hispanic White.

**Discussion:**

No Response needed

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

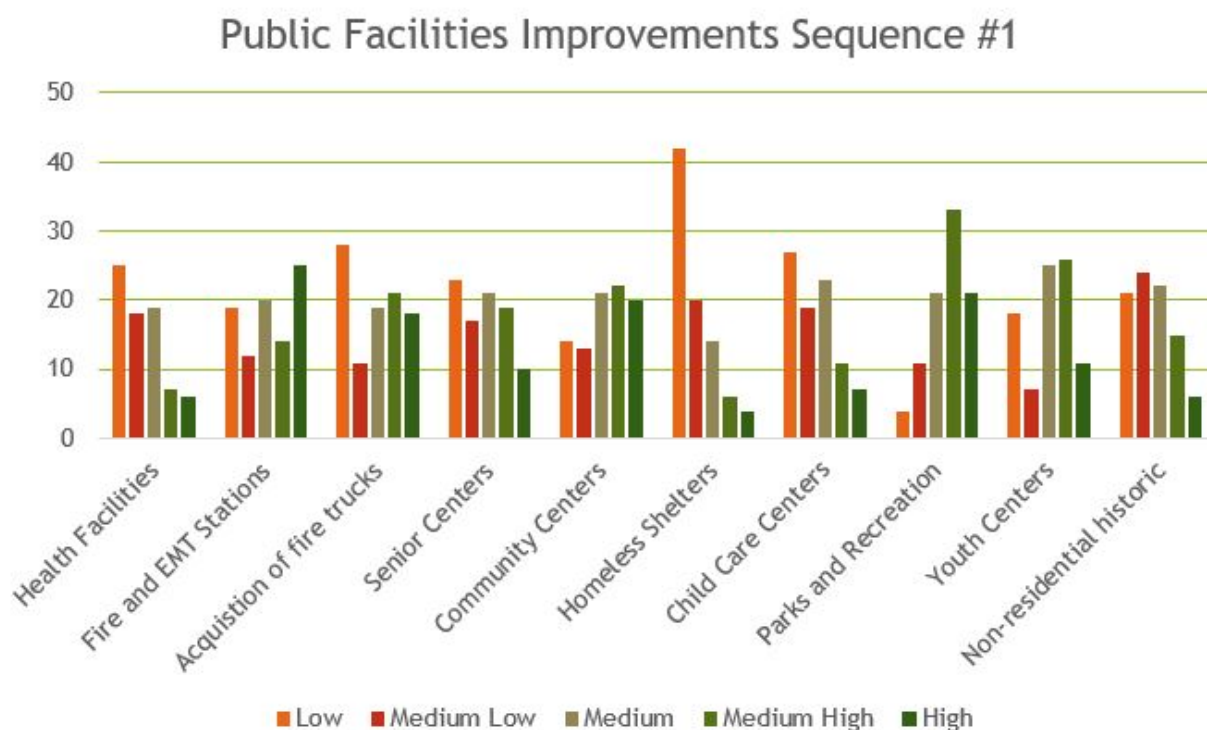
### Describe the jurisdiction's need for Public Facilities:

Based on the local government needs survey, Sequence No.1 the top three public facility needs are parks and recreation facilities, community centers and fire and EMT facilities.

### 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. In an attempt to understand Idaho cities and counties non-housing community development needs, IDC conducted a local government needs survey. The survey was sent out to 200 cities and 44 counties in July 2019. Of the 244 surveys sent out a total of 123 responded.

See below the survey results for the CDBG eligible activity groups. Sequence No.1



### Public Facilities Improvements

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

Based on the local government needs survey, See Sequence No.1 the top needs are water, sewer, streets, and sidewalk systems.

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

Commerce conducted a local government needs survey. The survey was sent out to 200 cities and 44 counties in July 2019. Of the 244 surveys sent out a total of 123 responded.

As side from the local government needs survey, another source, the American Society of Civil Engineers, 2018 Report Card for Idaho's infrastructure was used to further assess non-housing community development needs. Specific to public infrastructure the following systems were graded as such.

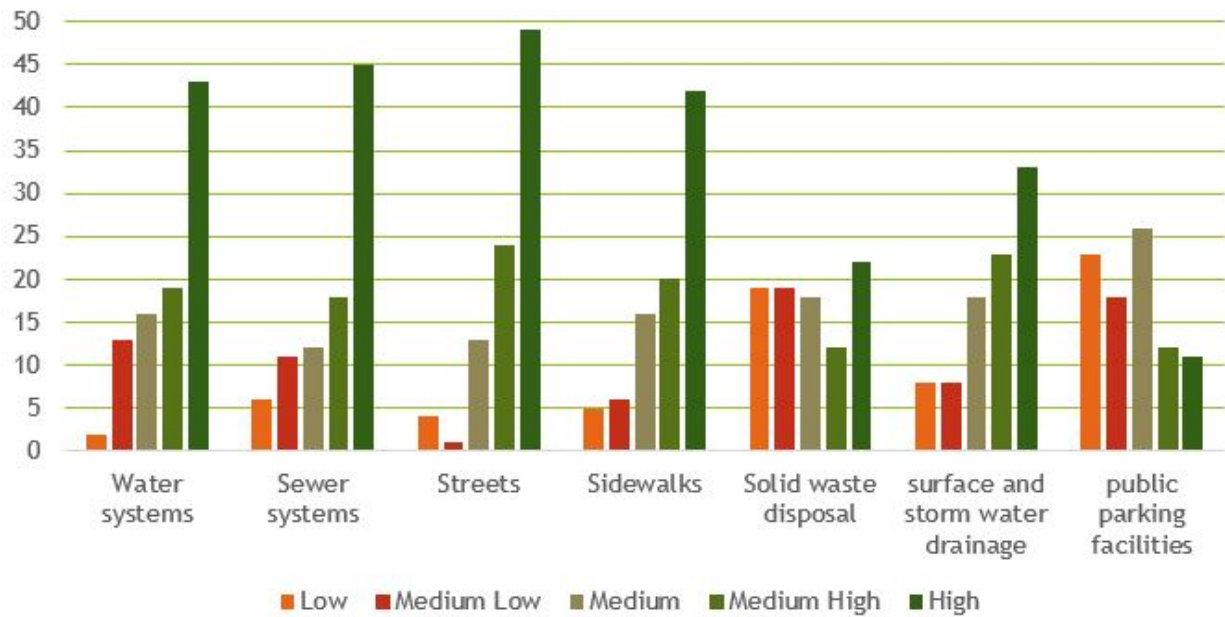
Drinking Water – (Grade C) – Idaho's drinking water infrastructure needs will grow in future years; especially as existing infrastructure ages and the state's population grows. The EPA estimated in its 2011 Drinking Water Infrastructure Needs Survey Idaho needs \$961.8 million in funding over the next 20 years. Small clean water systems which are defined by the EPA as serving 3,300 persons or fewer, are grappling with a significant portion of the total overall bill. The EPA estimates over the next 20 years, Idaho's small clean water systems will need an estimated \$776.9 million.

Wastewater- (Grade B-) The EPA reports that over the next 20 years, Idaho will require \$1.38 billion in wastewater infrastructure needs. Population growth is already demanding sewer system capacity expansion in Idaho. Additionally, there is tension between existing, current-day jurisdictional boundaries and the need to plan for tomorrow. Future communities will exist outside current-day city limits, and coordination to float bonds and plan comprehensively is needed.

Responses to the ASCE survey on wastewater infrastructure demonstrate that the ability of Idaho's systems to meet various levels of anticipated growth is a cause for concern. 50% of respondents reported their jurisdiction was capable of meeting only 70% to 90% of anticipated growth.

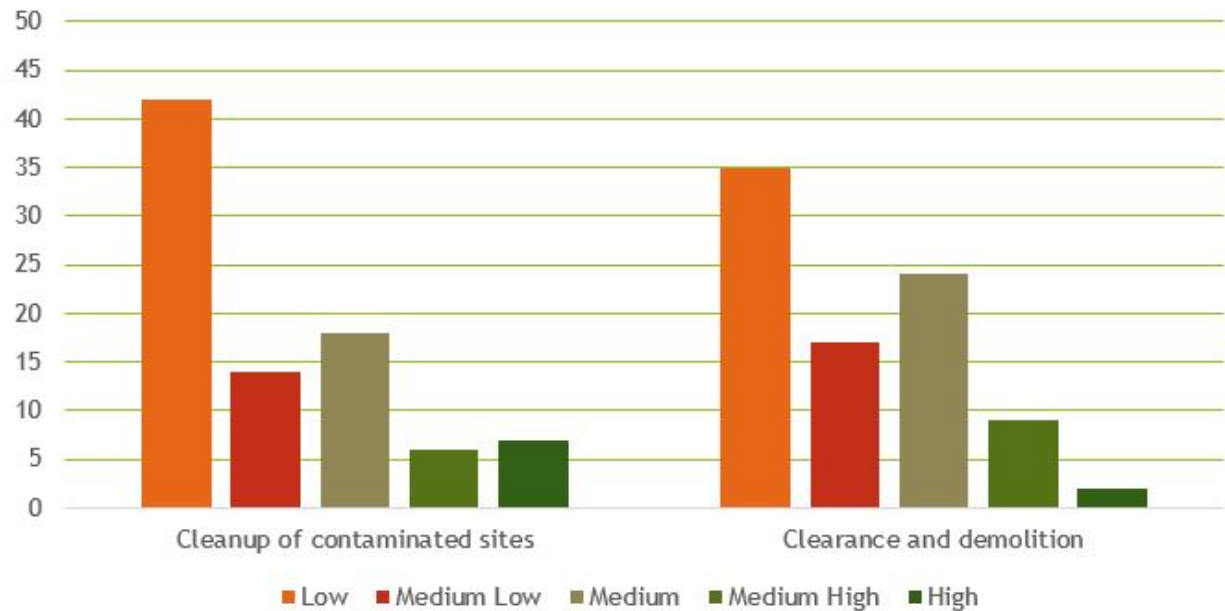
See below survey results for the CDBG eligible activity groups.

## Public Infrastructure Improvements Sequence #2



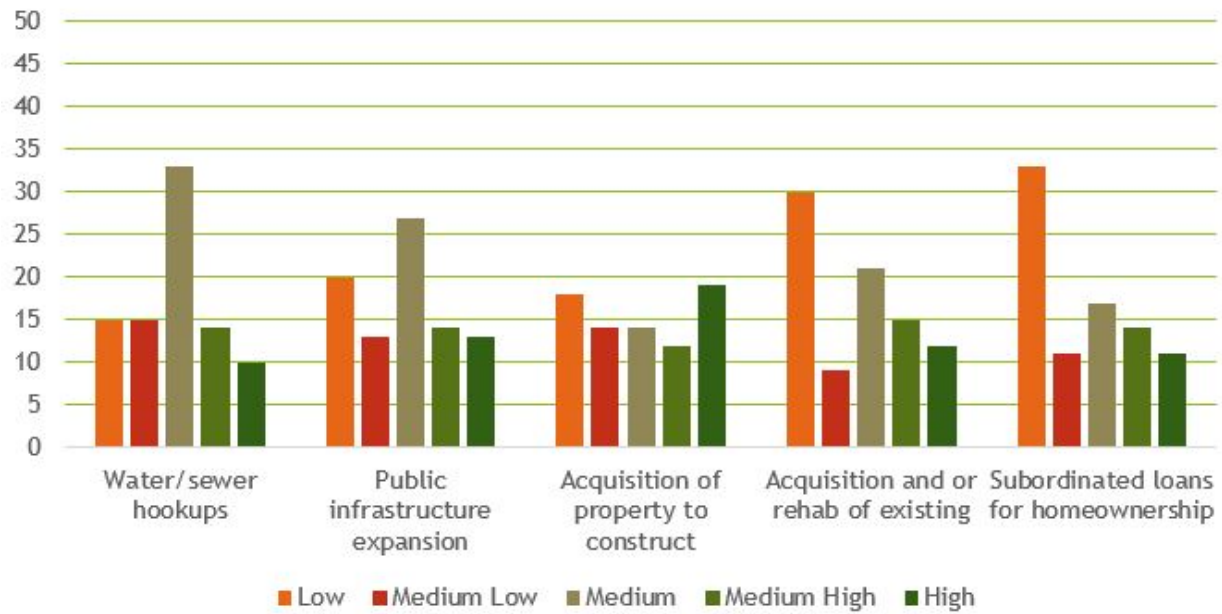
### Public Infrastructure Improvements

## Blighted Public Property Sequence #3



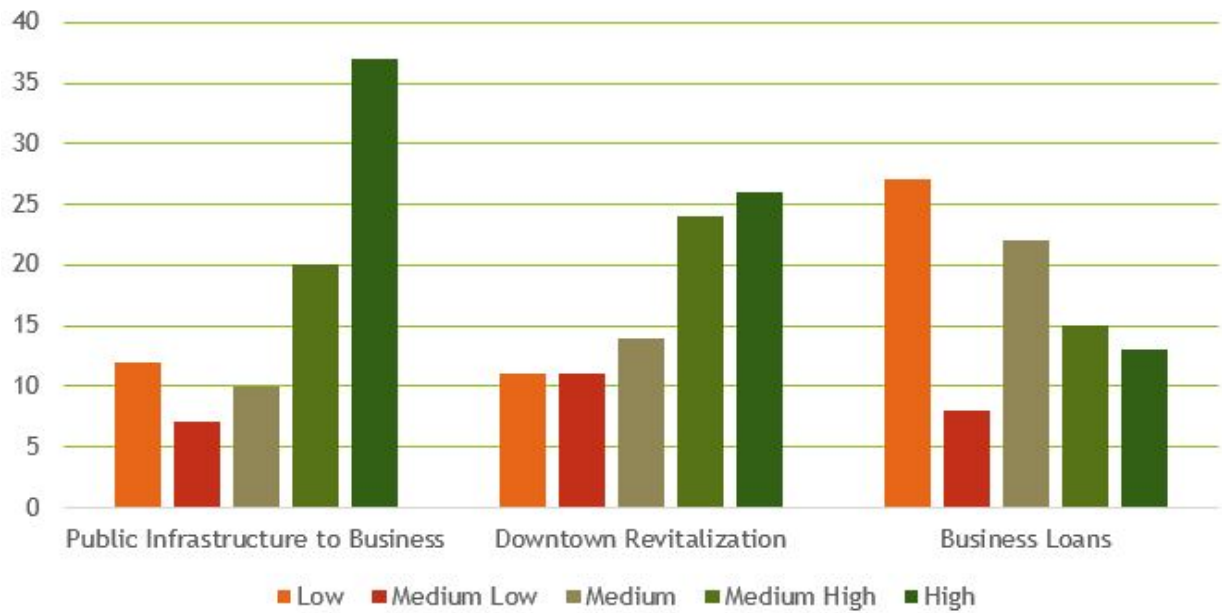
### Blighted Public Properties

### Housing Related Activities Sequence #4



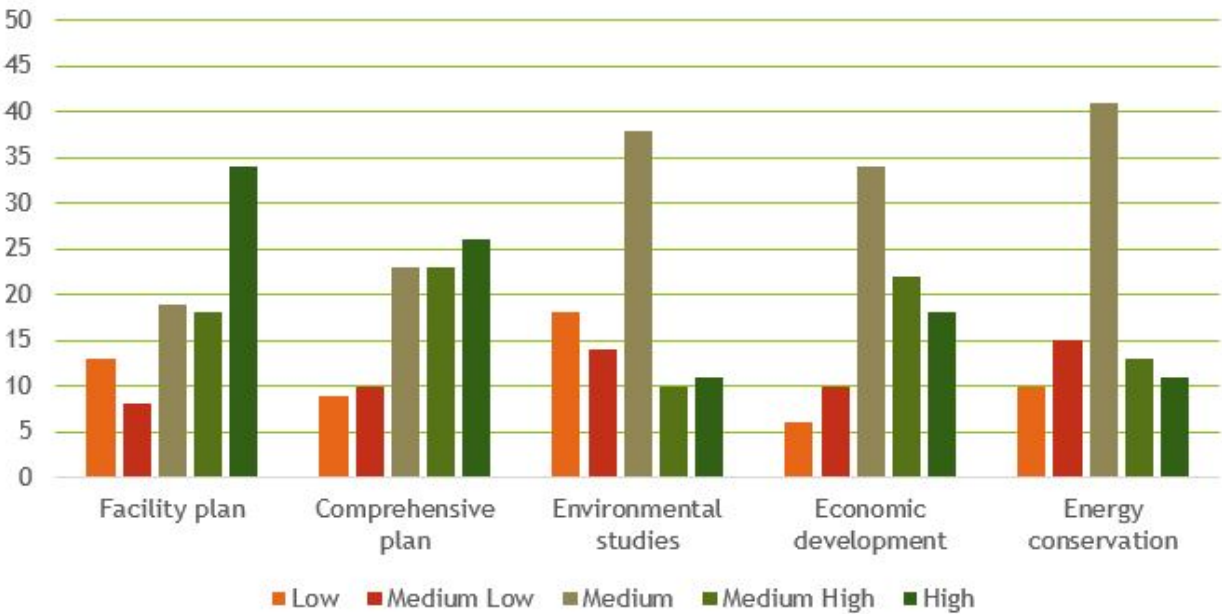
### Housing Related Activities

### Economic Development Sequence #5



### Economic Development

Planning Studies Sequence #6



Planning and Studies

**Parma** - The City appreciates the availability of monies for purposes which we cannot afford to manage ourselves. Thank you

**Arco** - I do not know how other small/tiny cities are doing but we are desperate for street repairs and have no money to fund them. Any direction would be helpful!

**Elk River** - Museum

**Preston** - There are limited resources available to rural communities. It would be beneficial for rural areas to compete with other rural areas and not large cities - i.e. Pocatello has more than Preston, so it would be great if Preston did not have to compete for the same funds.

**Bancroft** - This is a wonderful program and gives our community a light at the end of the tunnel. We have a small revenue base and really need some help right now. Thank you for considering our city for this grant money. Please feel free to contact me at the office if you can get me information regarding how to receive this grant to aid our community.

**Driggs** - Would like to see more grants/projects funded using smaller maximums.

**Chubbuck** - We need more education on how to use CDBG funds. To make my knowledge Chubbuck has never received any of these kinds of funds.

**Ketchum** - We need help for affordable housing!

**Post Falls** - Taking the cost of construction into consideration the grant amount should be re-evaluated

**Boundary** - This is a great program and the funding has greatly enriched our community. The CDBG program should continue to look for ways to increase funding for infrastructure that will have the greatest impact on job creation and community growth.

**Cambridge** - Small rural communities need jobs to help spur growth.

**Kootenai** - Costs and Expenses are rising

**Rupert** - Increase post-disaster

**Garden City** - Ideas 1) Radio and TV marketing campaign for G.C - show off the good things - change of perception helps everybody - "downtown revitalization" 2) Playground equipment at Riverpointe Park 3) Meeting room off the Library for other non-profits to provide services 4) Utilize "job creation" dollars to off-set some library expenses (i.e. computers, IT position, etc. - computer lab is used heavily for job applications/research)

**Georgetown** - We hope to be able to receive and have access to some of these funds and thank you for the opportunity.

**Canyon County** - Please Keep this program fully funded. It is a critical element in local governments ability to provide needed services.

**Ammon** - Provide grant writing services to cities that do not have staff or experience to write the grants. Thank You!

**Wilder** - With raising cost of construction most of these need to increase.

**Lioncoln** - Thanks! Great Program!

**Moore** - What we need is street help. We have dirt streets and need to haul a lot of gravel.

**Washington County** - \$500,000 should be increased to \$750,000-\$1,000,000. Increase in funds for County roads!!

**Deary** - This is the only way small cities can afford to make improvements.

**Hayden** - Do grants not tied to city avg. income. We have high and low and there is a great need.

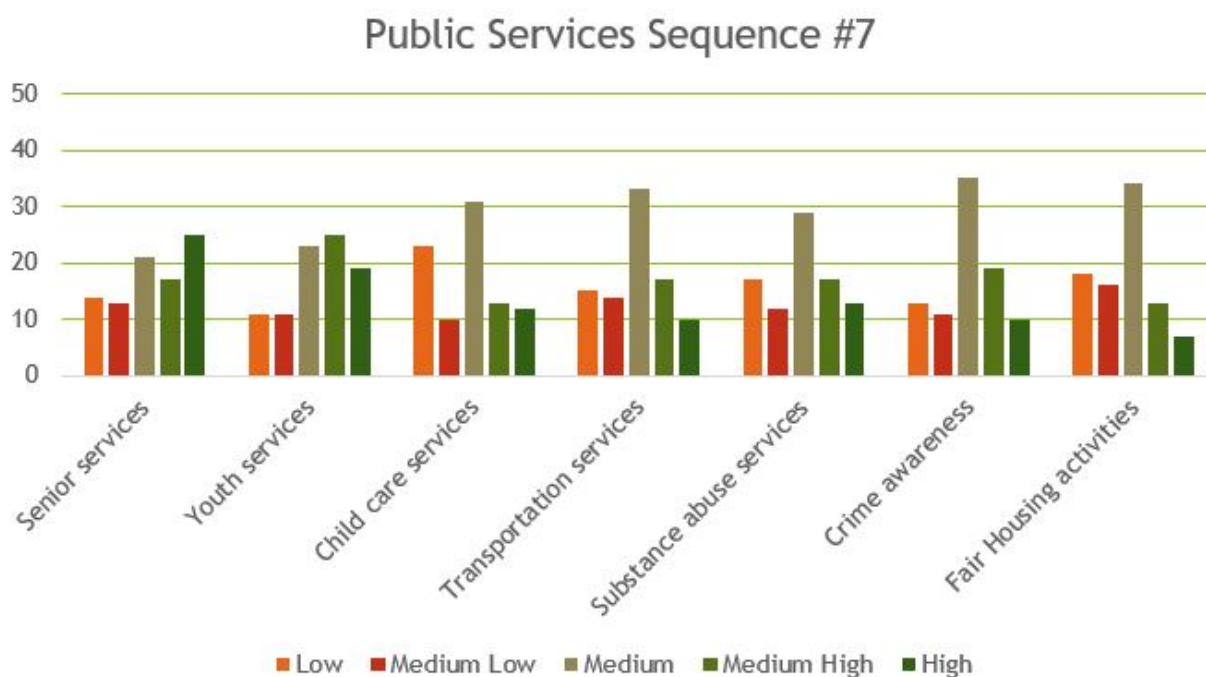
## Survey Result Comments

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

Based on the local government needs survey the top three public services, Sequence No.1 are for senior services, youth services and substance abuse services.

## How were these needs determined?

Commerce conducted a local government needs survey. The survey was sent out to 200 cities and 44 counties in July 2019. Of the 244 surveys sent out a total of 123 were received.



## Public Service



# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

Overall, in the last few years residents of Idaho have experienced the benefits and challenges of a hot housing market. In one hand, housing costs have increased with higher rents and home values and tighter inventory of housing units. At the same time “Help Wanted Signs” and other economic opportunities are increasing across the state.

The Idaho Economic Forecast of 2018-2021 predicts housing starts could help alleviate some of the pressure on the housing market. Starts reached 14,100 units in 2017, 1,700 over the previous year. In 2018, housing starts are expected to reach higher still, with the possibility of over 16,400 starts. Single-family housing unit growth has been particularly strong in recent years for Idaho when compared with the nation (for instance, 50% greater in 2017). Multi-family housing units are also growing strongly in the state. The number of multi-family units doubled between 2013 and 2017. Nationally they are expected to be up 16.3% in 2018.

Beyond the physical and economic constraints and opportunities of such expansion, access to affordable housing units in Idaho has become a continued challenge for many residents. With 73% of the residential properties in the state being single-family units as of 2015 and despite the recent growth in multi-family housing units, a mismatch persists between the growth of the state and the housing typology, which in the long term will impact access and affordable units for residents. As such, a long term vision and investment on affordable housing and regional economic growth is needed now more than ever to ensure the wellbeing of current and future residents of Idaho.

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

### Introduction

In order to draw a fair comparison between CHAS calculations and conditions presented by Census data, the following sections utilize 2011-2015 ACS five-year estimates. Based on such figures, single-unit detached properties make up the large majority of Idaho's housing stock. Multi-family units of five or more units make up about 8% of the housing market in the state. Most of multi-family units are found within urbanized areas of the state. Meanwhile, manufactured housing, such as mobile homes and RVs, make up about 9% of total stock. Such housing is often found in economically and environmentally vulnerable areas.

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	498,562	73%
1-unit, attached structure	19,796	3%
2-4 units	46,858	7%
5-19 units	33,131	5%
20 or more units	21,831	3%
Mobile Home, boat, RV, van, etc	60,124	9%
<b>Total</b>	<b>680,302</b>	<b>100%</b>

Table 7 – Residential Properties by Unit Number

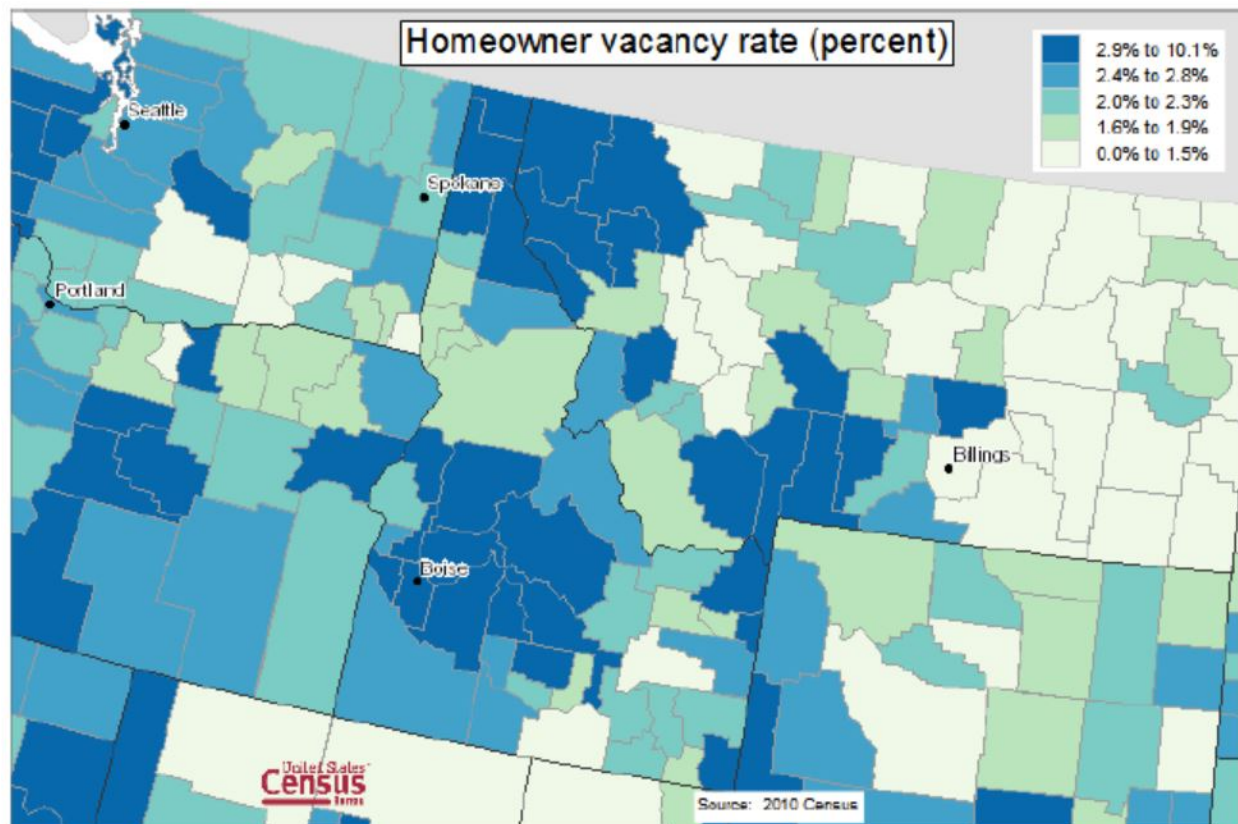
Data Source: 2011-2015 ACS

### Unit Size by Tenure

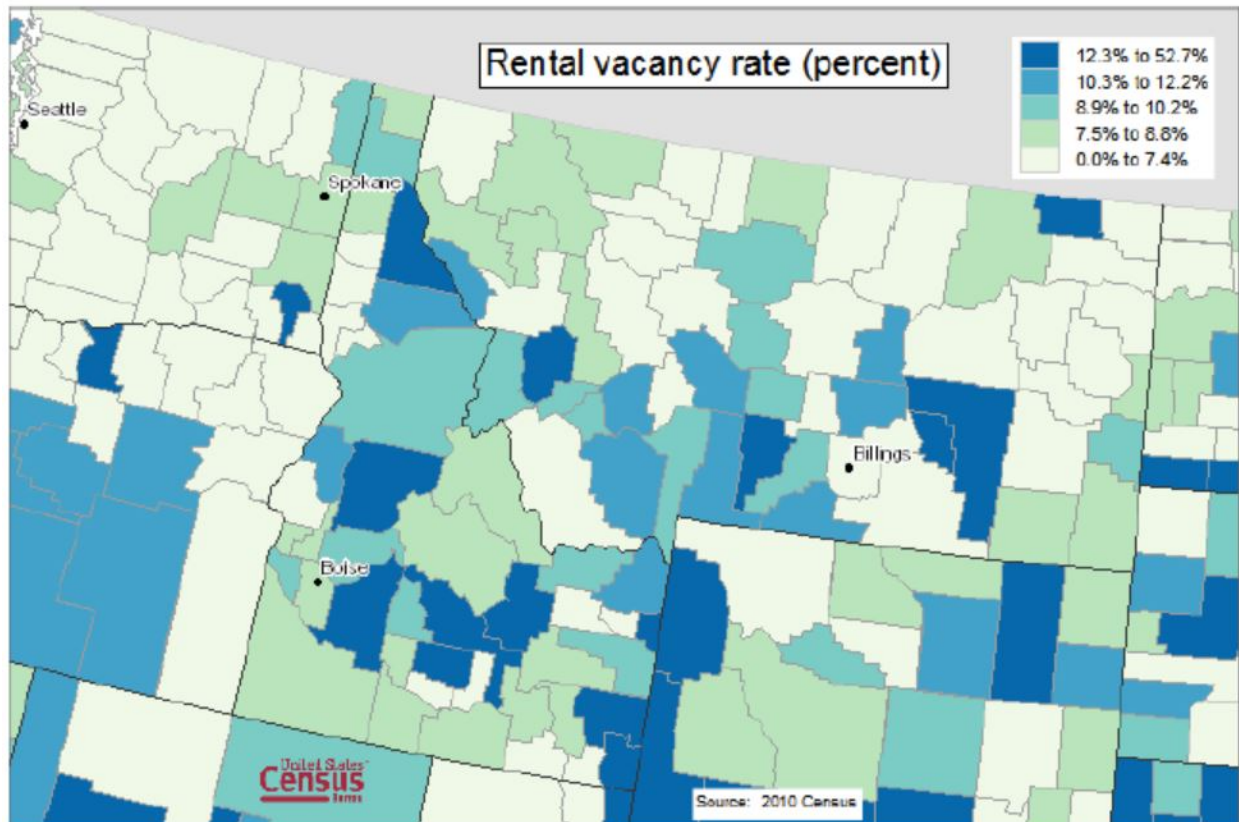
	Owners		Renters	
	Number	%	Number	%
No bedroom	1,324	0%	6,446	4%
1 bedroom	8,834	2%	29,061	16%
2 bedrooms	63,871	16%	69,784	38%
3 or more bedrooms	331,836	82%	78,164	43%
<b>Total</b>	<b>405,865</b>	<b>100%</b>	<b>183,455</b>	<b>101%</b>

Table 8 – Unit Size by Tenure

Data Source: 2011-2015 ACS



**Idaho Counties Homeowner Vacancy Rate**



**Idaho Counties Rental Vacancy Rate**

The programs below are under several different federal agencies. Because of this, the table can only provide a snapshot based on best estimate. It is important to remember these federal program may have different definitions of terms, timeframes, and calculations.					
Current Estimated Total Federal, State, Local Assisted Units					
	Federal Agency	Family	Elderly	Senior	Special Needs
HOME	HUD-CPD	799	82	114	137
	Single-family homebuyer	4321			70
LIHTC	US Treasury	6126	1535	720	0
USDA-RD	US Dept. of Agriculture	1621	1500	NA	434*
Section 8 HAP	HUD – Office Of Public And Indian Housing	2508	779	101	
IHFA- Section 8 Housing Choice Voucher*	HUD – Office Of Public And Indian Housing	4535**			
ESG	HUD-CPD	1456	176	88	1716
CoC	HUD-CPD	187	50	25	1197
HOPWA	HUD-CPD				134
STRMU	HUD-CPD				42

\*Farm Labor Housing

\*\*A breakdown by family type is not available. IHFA is one of a statewide network of public housing providers and serves the "balance of state". It does not oversee any city or countywide public housing jurisdictions.

#### Units by Federal/State/Local- assisted Units

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

See uploaded image as a JPEG for number of units by program and target population

Within the State of Idaho, Housing Choice Vouchers represent the majority of units and households assisted by federal, state, and local programs. The vast majority of those households, 85%, are White households. The majority of those families, 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 represented 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 fund 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.

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

According to ACS 2011-2015 estimates, the vacancy rate for owner-occupied units was 2%, thus highlighting the tight market for homeownership opportunities in the state. Meanwhile, the vacancy rate for rental units is more than double the rate of owner-occupied units at 5.5%. Such rate, and 2018 data from HousingIdaho.com and showcasing a vacancy rate of less than 2% for their listings, underscores the conditions of a tight rental market in the state and the lack of affordable housing units, particular for households in the most need.

Based on *Idaho County-by County Housing, Demographic Assessment* of 2018, 52.6% of the housing units in the state are affordable to renters earning the Area's Median Income. Meanwhile, about 78.6% of housing units are affordable to owners earning the Area's Median Income. 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 2018, for example, the City of Boise proposed changes related to Accessory Dwelling Units (ADU). The proposal would increase the size limit of an ADU to 700 square feet (but still limited to one bedroom), thus allowing the city to address the needs of a growing population in the city.

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.

## **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.

Stakeholders were asked their opinions about the top needs of specific housing types (and for specific population types) in the survey conducted for this Consolidated Plan. The top housing needs by type, according to stakeholders is included in the 2019 State of Idaho Housing Needs Assessment

## MA-15 Cost of Housing – 91.310(a)

### Introduction

Based on 2011-2015 ACS data, the State of Idaho has a total of 680,302 housing units as of 2015. The majority of those units, 73%, are single-family detached. The rest of the housing stock is largely made up of manufactured housing, with only about 8% of the units being multi-family structures. In many ways, such housing stock composition has not only led to the housing availability challenges of today, but also the overall cost of housing in the state.

For example, the median value of an owner-occupied unit in 2015 was \$162,900, which is a 53% increase from 2000. The median gross rent in 2015 was \$743, which is a 79% increase from 2000. However, a closer look at those trends reveals a more complex story. For example, the median value of an owner-occupied unit in 2010 was \$172,700, which was 6% higher than in 2015. Meanwhile, median gross rents were \$689 in 2010, which represents only 8% less than in 2015.

The latest released figures from ACS in 2017 reveals a complete reversal of the trends recorded in 2015. For example, median home values are up to \$176,800, which is an 8% increase from 2015. Meanwhile, median gross rents are up to \$792, based on 2017 ACS 5-year estimates, which is a 7% increase from 2015. Such ups and downs in the rental and homeownership market point to the difficulties faced by the state in properly allocating resources to ensure long-term housing affordability.

See Unique Appendices for additional information and tables.

### Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	166,700	162,900	(2%)
Median Contract Rent	567	626	10%

Table 9 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	60,263	32.9%
\$500-999	103,791	56.6%
\$1,000-1,499	14,484	7.9%
\$1,500-1,999	2,627	1.4%
\$2,000 or more	2,290	1.3%
<b>Total</b>	<b>183,455</b>	<b>100.0%</b>

Table 10 - Rent Paid

Data Source: 2011-2015 ACS



## Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	11,575	No Data
50% HAMFI	48,590	28,050
80% HAMFI	120,465	98,210
100% HAMFI	No Data	149,425
<b>Total</b>	<b>180,630</b>	<b>275,685</b>

**Table 11 – Housing Affordability**

Data Source: 2011-2015 CHAS

## Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	552	676	866	1251	1456
High HOME Rent	552	676	866	1155	1269
Low HOME Rent	552	660	791	914	1020

**Table 12 – Monthly Rent**

Data Source: HUD FMR and HOME Rents

Locality Name	2 BD FMR	2 BD High Home	Median Gross Rent	Difference
Ada County	\$736	\$736	\$821	-\$85
Adams County	\$643	\$643	\$564	\$79
Bannock County	\$643	\$643	\$609	\$34
Bear Lake County	\$643	\$643	\$573	\$70
Benewah County	\$643	\$643	\$594	\$49
Bingham County	\$643	\$643	\$573	\$70
Blaine County	\$947	\$947	\$931	\$16
Boise County	\$736	\$736	\$637	\$99
Bonner County	\$736	\$736	\$751	-\$15
Bonneville County	\$674	\$674	\$698	-\$24
Boundary County	\$643	\$643	\$647	-\$4
Butte County	\$643	\$643	\$533	\$110
Camas County	\$648	\$648	\$735	-\$87
Canyon County	\$736	\$736	\$731	\$5
Caribou County	\$643	\$643	\$513	\$130
Cassia County	\$643	\$643	\$535	\$108
Clark County	\$643	\$643	\$504	\$139
Clearwater County	\$643	\$643	\$583	\$60
Custer County	\$643	\$643	\$446	\$197
Elmore County	\$684	\$684	\$676	\$8
Franklin County	\$649	\$649	\$623	\$26
Fremont County	\$676	\$676	\$629	\$47
Gem County	\$657	\$657	\$758	-\$101
Gooding County	\$643	\$643	\$586	\$57
Idaho County	\$643	\$643	\$571	\$72
Jefferson County	\$674	\$674	\$680	-\$6
Jerome County	\$643	\$643	\$676	-\$33
Kootenai County	\$743	\$743	\$809	-\$66
Latah County	\$670	\$670	\$659	\$11
Lemhi County	\$643	\$643	\$535	\$108
Lewis County	\$643	\$643	\$574	\$69
Lincoln County	\$643	\$643	\$696	-\$53
Madison County	\$660	\$660	\$633	\$27
Minidoka County	\$643	\$643	\$557	\$86
Nex Perce County	\$695	\$695	\$640	\$55
Oneida County	\$643	\$643	\$532	\$114
Owyhee County	\$736	\$736	\$535	\$201
Payette County	\$680	\$680	\$666	\$14
Power County	\$643	\$643	\$539	\$104
Shoshone County	\$643	\$643	\$585	\$58
Teton County	\$784	\$784	\$865	-\$81
Twin Falls County	\$664	\$664	\$683	-\$19
Valley County	\$686	\$686	\$659	\$27
Washington County	\$643	\$643	\$585	\$58

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

With over 75% of the rental housing units with rents less than \$1,000, overall access to affordable housing for households at all income levels is sufficient, though misleading in geographical terms. Counties experiencing population growth, such as Canyon County, have a lower percentage of affordable units accessible to renters and homeowners, while counties experiencing population drops have a higher portion of affordable units. Overall, urban counties continue to experience higher gaps in affordability for all income levels, while rural counties with higher transportation and maintenance costs face an array of other affordability barriers.

Based on 2011-2015 CHAS data available in the Unique Appendices, there are 167,485 households experiencing housing cost burden of over 30% in the state of Idaho. With only about 138,980 units affordable to households with an HAMFI of 50% or less, the gap between housing supply and demand will continue to make such gap and burden larger over time.

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

At the same time there is disconnection between supply and demand in urban and rural counties, there is a gap in rising home values. For example, rural counties in Idaho are experiencing higher median home values that have risen significantly from 2010, while urban counties experienced the opposite effect based on 2011-2015 ACS data. For example, Ada County's median home values were \$189,800 in 2015, which was a 13% drop from home values in 2010. In recent years, however, the trend outlined above appears to be shifting in some areas. For example, as of 2017, ACS data showed that Ada County median home values were up to \$223,500 which was a notable 17% increase from 2015. Whether such shift is indicative of statewide trends or changing local market demands remains to be seen in the next five years.

See the Unique Appendices for additional tables.

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

HOME rents, and in particular Fair Market Rents, are overall comparable to the Area Median Rent of \$743, based on 2011-2015 ACS figures. According to such data, for example, a 2-bedroom apartment's median rent is \$693, which is below the high, low, and fair HOME rents range of \$761-\$866.

It is worth noting that since 2015, based on figures published by Zillow, rents have increased significantly in the state. For example, according to Zillow, as of November 2018, median listed rents for a two-bedroom home were \$980, which is a 41% increase since 2015 and higher than current HOME rents. Meanwhile, HOME rents in the Boise MSA have gone from \$736 for the High HOME rent for a 2-bedroom home in 2015 to \$866 in 2018, which represents a 17.7% increase that falls far short of the increases seen in the local market.

Though not the entire picture, the comparison between data from Zillow to HOME rent levels in the Boise MSA provides the state a snapshot of potential gaps in housing affordability to be mindful of in the next five years. A closer look at other areas of the state, such as the Idaho Falls MSA for example, reveals that while 2018 High HOME rents for a 2-bedroom have gone up to \$739 from \$674 in 2015, median rental listings in Zillow have stayed in the \$625-\$695 range during 2018 for a 2-bedroom unit. Similar trends can be seen in the Pocatello MSA in which High HOME rents have gone up from \$643 in 2015 to \$719 for a 2-bedroom unit in 2018, but Zillow listed median rents for the same unit type have stayed in the \$625-\$650 for 2018. However, areas such as the Coeur d'Alene, ID MSA that experience higher tourism rates have seen median rents posted in Zillow range from \$1025 to \$1305 for a 2-bedroom unit in 2018, while the High HOME rents for 2018 have stayed at \$848.

Moving forward, the State of Idaho will take such spikes and dichotomies in the rental market into account in order to allocate the necessary resources to maintain the supply of affordable housing units for families that may be increasingly left out of the housing market in certain areas of the state, while

ensuring that infrastructure and economic development investments continue in areas where housing affordability is still attainable to households.

## **Discussion**

Optional not required

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

### Introduction:

It is worth noting many rural counties and smaller local jurisdictions in Idaho do not have a local housing code or local property/housing quality standards. The State of Idaho has adopted a building, residential, and other applicable codes. For example in 2000, legislation was approved to address a uniform building code for the state, and for the first time addressed accessibility standards required by the Federal Americans with Disabilities Act (ADA) and the Fair Housing Act requirements. At the time that bill was adopted it was directed that when the new International Code Council finished its process on the 2000 ICC codes Idaho would address them. Meanwhile, in 2010, the state signed an agreement with the Federal Department of Energy to begin adoption and implementation of the current International Energy Efficiency Code (IECC). Since then, Idaho has adopted commercial, existing and energy building codes that are updated to 2015 standards, while companion residential codes have not been updated in the past 6-9 years.

For additional discussion regarding current status of state and local building codes, see Idaho Association of Building Officials ["Recent History of Codes in Idaho - 2000-2018"](#)

### Definitions

Standard Condition - A property that meets all of the following: Local housing code, local property standard, local ordinances, Idaho building code as applicable to the type of housing, and the Program's regulatory property standard.

Substandard Condition - A property that does not meet one or more of the following: Local housing code, local property standard, local ordinance(s), Idaho building code as applicable to the type of housing, or the HOME/HTF program's property standard.

Substandard Condition but Suitable for Rehabilitation - A property that can be brought up to local housing code, local property standard and ordinances, Idaho building code as applicable to the type of housing, and the HOME/HTF program's property standard, with total rehabilitation costs that are less than 75% of the property's total cost of replacement after the rehabilitation.

See the Unique Appendices for additional information and tables.

### **Risk of Lead-Based Paint Hazards in housing constructed prior to January 1, 1978**

Federally assisted housing in Idaho is required to have an EPA Risk Assessment/Paint Testing to determine the presence of Lead-based Paint prior to a commitment of funds for rehabilitation of residential housing constructed on or before January 1, 1978. Both developer and contractor(s) are required to be an EPA-certified renovation firm, and follow the EPA Renovation, Repair, and Paint Rule and HUD's Lead-Safe Housing Rule if LBP is exceeds HUD's de minimis levels.

See the Unique Appendices for table.

### **Need for Owner and Rental Rehabilitation**

With over 40% of units in the State of Idaho built before 1980, the need for owner and rental home rehabilitation and general upkeep is most likely high in the state given the age of the structures. For example, according to 2011-2015 CHAS data, 47% of rental units reported at least one problematic housing condition, which is almost double the rate of 24% reported for owner units. Such problematic housing conditions include: (1) lacks complete plumbing facilities, (2) lacks kitchen facilities, (3) more than one person per room, (4) cost burden greater than 30%.

At the same time, 75% of owner units reported no problematic conditions; and the majority of rental units, 51%, also reported no problematic conditions. While direct data on rehabilitation needs in the state is not readily available, given such conditions and the general rural/urban divide of the state, it is likely that the need for owner and rental rehabilitation is concentrated in certain areas of the state. Rural communities near recreational areas with older homes, for example, have higher housing values and an incentive to sell or rehabilitate because of demand from second-home owners who come in and buy properties or tourists flooding the rental the market. At the same time, rural areas in non-recreational zones may not have the same incentives to rehabilitate, thus leading to more severe housing conditions. Meanwhile, because of recent growth in urbanized areas, owners and landlords may not yet be experiencing the economic or financial pressure to renovate or rehabilitate older homes in order to meet demand.

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

Based on 2011-2015 ACS figures, about 47% of Idaho's 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 Lead-based paint, homes built between 1940 and 1959 (76,635 units) have a higher risk for having LBP.

With 9% of the rental homes and 6% of owned units built before 1980 having a presence of children under the age of 6, it is important to assume any exposure to Lead-based paint 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.

### **Discussion:**

Overall, the State of Idaho has been successful in reducing the exposure to LBP to families with children under the age of 6 and overall in the state. In 2011, for example, only 13% of rental units built prior to 1980 had a child under the age of 6 present; moreover, 52% of all rental units had been built prior to 1980. By 2015, that percentage of rental units built prior to 1980 with children under the age of 6 dropped to 9%, while the overall number of rental units built prior to 1980 dropped to 49%.

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 lead-based paint 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 lead-based paint hazard even further in the state.

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

### **Introduction:**

Idaho Housing and Finance administers HUD's Section 8 Housing Choice Voucher program in 34 counties in Idaho. 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 governing board, which is responsible for the Public Housing Authority and all its activities.

Over the next five years, IHFA will:

- Continue to administer the Section 8 Housing Choice Voucher Homeownership program, which is currently available only to disabled households and those households currently participating in the Voucher Family Self Sufficiency program
- Actively apply for additional voucher funding whenever available
- Consider the issuance of project-based vouchers in some areas of Idaho. These project-specific vouchers would be limited to certain targeted populations such as persons with disabilities, veterans, or persons experiencing homelessness
- Hold regional PHA Plan hearings and perform outreach in each area that has an IHFA branch office that administers Housing Choice vouchers, to encourage participation in a Resident Advisory Board.

See Unique Appendices for Table

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

**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 not required

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

State response 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 not required

### **Discussion:**

State response not required



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

### Introduction

See Unique Appendices- Exceeds number of allowable characters.

### 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)	448	92	227	415	0
Households with Only Adults	618	153	163	602	0
Chronically Homeless Households	0	0	0	456	0
Veterans	4	0	59	486	0
Unaccompanied Youth	10	0	0	0	0

**Table 13 - Facilities Targeted to Homeless Persons**

Data Source Comments:

State of Idaho: Housing and Services For Homeless Persons <sup>21</sup>	
<b>Facilities<sup>22</sup></b>	Idaho State School and Hospital—Specialized services for the most severely impaired persons with developmental disabilities. Provides safety net for those who have no other placement options and pursues the most appropriate opportunities for clients who are ready to leave the facility. Discharges are to available community-based services such as supported living with the goal of increasing the ability to return clients to their homes. <sup>23</sup>
Intermediate Care Facilities—Group living for adults and children with developmental disabilities and intense needs to support. <sup>24</sup>	
<b>Supportive Services<sup>25</sup></b>	Vocational Rehabilitation—State program to assist persons with disabilities to prepare for, secure, retain, or regain employment. <sup>26</sup>
Substance Abuse Providers—There is an array of providers across the state that offer services, including crisis intervention and referral, counseling, detox programs, and inpatient treatment. <sup>27</sup>	
H&W, Adult Behavioral Health—Personalized case management services for individuals with severe and persistent mental illnesses. Additionally, ABH can provide referrals to PSH projects across the state which provides tenant-based rental assistance. <sup>28</sup>	
Housing Opportunities For Persons with HIV/AIDS (HOPWA)—Housing-related case management is provided through this program. It may assist households in locating affordable housing, establishing stable living situations, and assisting with securing permanent housing. <sup>29</sup>	
Continuum of Care (COC)—COC projects may provide supportive services to homeless individuals participating in PSH projects, including case management, counseling, and financial management, among other services. <sup>30</sup>	
Emergency Solutions Grant—Financial counseling, housing locator assistance, and case management are all services available to homeless individuals accessing this program. <sup>31</sup>	
Idaho School Districts—Employ homeless liaisons which provide support, services, and referrals for homeless school-aged children and their families. This may include connections to nutrition supplements, housing programs, healthcare, and stabilization programs, among other services. <sup>32</sup>	
<b>Supportive Housing<sup>33</sup></b>	Veteran Affairs Supportive Housing (VASH)—Homeless veterans receive tenant-based rental assistance from the local PHA while also receiving case management through the Veterans Administration. <sup>34</sup>
Continuum of Care (COC)—Homeless individuals and families can receive transitional or permanent housing, or rapid re-housing while as receiving supportive services either through the housing provider or through a partnering agency. <sup>35</sup>	
<b>Emergency Shelters<sup>36</sup></b>	Emergency Solutions Grant—Homeless persons may gain entry to emergency shelters which may provide up to 90 days of living accommodations, along with supportive services to assist individuals and families in locating more permanent living situations. <sup>37</sup>
Faith-Based Organizations—Various faith organizations across the state provide shelter beds or short-term housing assistance, including motel vouchers. <sup>38</sup>	
<b>Affordable Housing<sup>39</sup></b>	Low Income Housing Tax Credits—This resource is used to finance the development of housing that is affordable to households with incomes at predetermined intervals below the area median income. <sup>40</sup>
Section 202 Housing—Designated specifically for elderly and disabled to live as independently as possible, although some amenities such as housekeeping, transportation, referrals, and counseling services may be provided. <sup>41</sup>	
Section 8 Housing Choice Vouchers—Low-income households receive tenant-based rental assistance that allow for tenant choice in the selection of their living location. They pay 30-40% of their income towards rent and utilities. <sup>42</sup>	
<b>Domestic Violence<sup>43</sup></b>	Council on Domestic Violence and Victim Assistance—funds, promotes, and supports services to victims of domestic violence. There are 32 sub-grantees across Idaho providing refuge and supportive services. ... → <sup>44</sup>

## Housing and Services for Homeless

Facilities targeting DV only

	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)	199	0	76	0	0
Households with Only Adults	35	0	9	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

DV Only

**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, ESG, or HOPWA programs, or partnering agencies. Services may include case management, child care 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 is needed. Apart from projects and agencies operating COC, ESG, and HOPWA 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. One prevalent commonality among those experiencing homelessness is the existence of a disabling condition. With this understanding, the BOS COC and staff administering COC, ESG and HOPWA 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.

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 seeking systems that successfully pair vulnerable populations to appropriate services will all generate a positive impact on Idaho's homeless population.

See attached JPEG *Housing and Services for Homeless*

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

### **Introduction**

Many Idahoans 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, ESG, and HOPWA programs to meet the special needs and services for communities in the state. While also maintaining Idaho's Homeless Management Information System, HOME and Low Income Housing Tax Credit allocations, and a large portion of the total Section 8 Housing Choice Vouchers available in the state, IHFA is in a unique position 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.

See Unique Appendices for additional information and table.

### **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**

Supportive housing is made available in two forms; scattered- or single-site. Services associated with supportive housing projects are case management, transportation, life skills training, counseling, and educational and career building, among others. Access to public assistance through programs such as SSI/SSDI Outreach, Access, and Recovery (SOAR) greatly improve one's ability to experience a stable living environment. These housing and service options assist not only those coming directly into housing from the streets, but those exiting institutions as well. The housing provided offers stability, and safe, decent, and sanitary environments. The services offered aid individuals in working towards being employable, gainfully employed, receiving linkages to resources, and removing barriers to attaining stable housing.

### **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. IHFA also provides housing and/or supportive services to households participating in the Housing Opportunities For Persons With HIV/AIDS (HOPWA) program. Homelessness is not a required program admittance requirement. HOPWA participants may receive permanent rental subsidies, along with individualized case management. While the COC, ESG, and HOPWA programs may serve vulnerable populations (elderly, frail elderly, persons with disabilities, etc.), the only specifically targeted subpopulations are HIV/AIDS and disabled.

**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))**

Not applicable to State Grantees.

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

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

Response exceeds maximum allowable characters- See Unique Appendices.

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

### Introduction

This section of the Plan evaluates the workforce and infrastructure of Idaho. These are two critical components that help a community meet availability, affordability, and sustainability. The workforce numbers provided, should help Idaho identify priorities in educating and training of it's current and future workforce. Also, whereas, infrastructure is the key to creating a seed bed for economic development, the State needs to recognize its infrastructure needs. By taking a proactive charge, Idaho can ensure that its infrastructure is maintained, protects the environment, and can be adequately funded. Lastly, ensuring its citizen have job opportunities is critical. Private sector jobs are key to the state's economy, so an assessment of what incentives are available to businesses should be understood and continually evaluated for effectiveness. The responses to the questions below should help us understand how to improve our non-housing community development assets.

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	21,601	24,630	7	11	4
Arts, Entertainment, Accommodations	36,344	27,647	12	12	0
Construction	21,785	21,215	7	9	2
Education and Health Care Services	51,330	31,198	17	14	-3
Finance, Insurance, and Real Estate	15,384	9,435	5	4	-1
Information	4,690	2,961	2	1	-1
Manufacturing	39,818	32,129	13	14	1
Other Services	9,394	7,539	3	3	0
Professional, Scientific, Management Services	21,015	11,583	7	5	-2
Public Administration	2	0	0	0	0
Retail Trade	48,833	35,651	16	16	0
Transportation and Warehousing	12,442	10,642	4	5	1



Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Wholesale Trade	17,148	12,759	6	6	0
Total	299,786	227,389	--	--	--

**Table 14- Business Activity**

**Data Source:** 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

## Labor Force

Total Population in the Civilian Labor Force	457,016
Civilian Employed Population 16 years and over	424,995
Unemployment Rate	7.04
Unemployment Rate for Ages 16-24	19.57
Unemployment Rate for Ages 25-65	4.07

**Table 15 - Labor Force**

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	88,917
Farming, fisheries and forestry occupations	16,285
Service	47,532
Sales and office	97,450
Construction, extraction, maintenance and repair	59,643
Production, transportation and material moving	27,659

**Table 16 – Occupations by Sector**

Data Source: 2011-2015 ACS

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	292,944	75%
30-59 Minutes	77,467	20%
60 or More Minutes	20,495	5%
<b>Total</b>	<b>390,906</b>	<b>100%</b>

**Table 17 - Travel Time**

Data Source: 2011-2015 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	29,930	3,299	18,331

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	91,535	6,455	39,187
Some college or Associate's degree	129,724	7,712	45,578
Bachelor's degree or higher	92,714	2,357	20,393

**Table 18 - Educational Attainment by Employment Status**

Data Source: 2011-2015 ACS

### Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	1,398	4,093	5,870	10,870	8,493
9th to 12th grade, no diploma	11,998	8,520	7,518	14,874	12,751
High school graduate, GED, or alternative	31,895	34,074	30,182	73,065	46,316
Some college, no degree	36,596	33,682	31,010	68,622	38,258
Associate's degree	4,927	12,946	12,516	25,588	8,812
Bachelor's degree	3,785	20,137	22,540	40,269	19,472
Graduate or professional degree	376	5,775	8,260	19,107	11,943

**Table 19 - Educational Attainment by Age**

Data Source: 2011-2015 ACS

### Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	6,020,948
High school graduate (includes equivalency)	8,976,502
Some college or Associate's degree	10,384,919
Bachelor's degree	12,713,893
Graduate or professional degree	12,908,919

**Table 20 – Median Earnings in the Past 12 Months**

Data Source: 2011-2015 ACS

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

1. Education and Health Care Service

2. Retail Trade
3. Manufacturing
4. Arts, Entertainment, Accommodations

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

The 2026 workforce needs of Idaho are based on what is projected to be the top growth industries for employment. Obviously, the top growing industries need the workforce to maintain and allow for the growth, further the individuals within the workforce need to be educated and trained to serve those industries and sectors. What does this mean for the state? We should recognize those industries, evaluate their impacts, and if felt beneficial, develop education and curriculums to ensure expansion of the industry. The top six industries for growth are:

- Trade, transportation, and utilities (+24k jobs)
- Health Care and Social Assistance (+21k jobs)
- Leisure and Hospitality (+11k jobs)
- Professional and Business Services (+9k jobs)
- Construction (+8k jobs)
- Education (+7k jobs)

The projected education for the 2026 workforce is that:

- 38% will need a high school diploma or lower,
- 22% some college,
- 10% associates degree,
- 20% Bachelor's Degree, and
- 10% Advanced Degree.

Idaho's projected growth rate is expected to slow from 2.4% to about 1.4%. What this means for the workforce is that there will be continued growth across a diverse range of industries and a strong demand for skilled workers (especially in construction, manufacturing, healthcare, IT, and financial services). Further, complex work will account for roughly 60% of expected new jobs.

Source: Idaho Dept of Labor - Labor Market Projects for Idaho

**Infrastructure needs are identified in the Unique Appendices.**

**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.**

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. However, one public / private sector investment that could have a major impact would be the development and manufacturing of small modular nuclear reactors at the Idaho National Lab, especially in the eastern part of the state. The SMR development would greatly increase the need for skilled manufacturing and nuclear technicians.

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.

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

The skills and education of the workforce in Idaho and the opportunities available to them continue to evolve with the changing workforce landscape on a statewide, national, and international level.

The Idaho Department of Labor (Labor), in their 2016-2026 Labor Market Projections for Idaho Report, break out base year employment and projections into four categories" cognitive complex, manual complex, manual routine, and cognitive routine. The descending order in terms of projected percentage growth over the 2016-2026 period are:

- Manual complex jobs (food prep, retail, etc.)
- Cognitive complex jobs (managers, computer scientists, architects, etc.)
- Manual routine jobs (construction, manufacturing, production, etc.) and
- Cognitive routine jobs (office and administration, sales, etc.)

The Labor report also addresses future industry needs, occupations and education level necessary to complete the workforce. The top five projects industry growth rates are: health care and social assistance, trade transportation and utilities, construction, financial activities, and leisure and hospitality. Employment growth by occupation translates to a staffing matrix directly linked to those growth industries.

Idaho educational institutions and state and federally sponsored workforce development tools and incentives continue to work to address the issue of how to best allocate resources to be most impactful in filling and creating the jobs in most demand with the largest cross-section of the participating workforce.

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

**Workforce Development Training Fund Program** – This program administered by the Idaho Workforce Development Council awards grants to reimburse approved training costs to eligible applicants bringing jobs to Idaho, adding jobs through expansion and/or retraining existing workers. Grants include: Employer Grant - awarded to a company to reimburse workforce development training costs. Industry Sector Grants - Designed to fund projects serving youth or adults and benefiting localized and/or rural efforts. Innovation Grants - Designed to fund projects serving youth or adults and benefiting localized and/or rural efforts. The council also strategically sponsors Outreach Projects that provide public information on career education and workforce training opportunities, including existing education and training programs and services not funded by the training. The fund is financed by employers through an offset to the unemployment insurance tax.

**On-the Job Training Program** - This program administered by the Idaho Department of Labor will allow qualifying businesses to receive a reimbursement for partial training costs when they agree to hire and train an eligible worker(s). Eligible workers include laid off individuals, job seekers newly entering the workforce, recent veterans returning to civilian life, and skilled workers seeking an occupational change.

**Work Opportunity Tax Credit** - WOTC is a federal income tax credit of up to \$9,600 per employee that encourages employers to hire job seekers who meet the qualifications for specific targeted groups. The credit is designed to help job seekers most in need of employment gain job experience and move toward economic self-sufficiency.

These initiatives and programs support the Consolidated Plan in that they are providing job training to individuals for skilled and semi-skilled positions in growing industries. This should improve an individual's ability to qualify for and retain a good paying job. Having a good job skills set should help reduce the number of low income and poverty level families in the State.

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

- **Idaho Tax Reimbursement Incentive (TRI)** - TRI is a performance based incentive that provides tax credit up to 30% for up to 15 years on new corporate income tax, sales tax, and payroll taxes paid as a result of a new qualifying project. To qualify, a new project must meet certain requirements for creating high-paying jobs in Idaho. The credit is refundable and is available to both existing and new companies. The tax credit percentage and project term is negotiated

based upon the quality of jobs created, regional economic impact and return on investment for Idaho.

- **Business Advantage Program** – If your business invests at least \$500,000 in new facilities and creates 10 or more jobs with salaries averaging \$40,000 a year with benefits, you may qualify for an incentive package which could include a variety of tax credits and property tax exemptions.
- **3% Investment Tax Credit** – If a business makes qualifying new investments in personal property, they may earn a 3% income tax credit to offset up to 50% of their tax liability.
- **Property Tax Exemption** – If a business invests \$500,000 to \$3 million (depending on the county) in a new manufacturing facility, they may receive a full or partial property tax exemption on the building facilities and personal property for up to five years.
- **Idaho Opportunity Fund** – Grants can be awarded to local governments to support the expansion or extension of infrastructure to support a qualifying businesses. A qualifying business must be creating jobs.

**Idaho Collateral Loan program** - Idaho Housing and Finance Association is the administrator of this Program. Small businesses statewide who are interested in this program will work with their local banking and lending institution 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. The deposits are available to cover loan losses, in the event of a default, or are returned to be recycled for the benefit of another qualified borrower.

**Opportunity Zones** - In 2018, Idaho designated 28 census tracts as opportunity zones. Opportunity Zones are 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. The Department of Commerce continues to market the established zones at their website and offer information.

**Comprehensive Economic Development Strategies (CEDs)** - The state is committed, where it can, to help the economic development districts implement action items as identified in their CEDs.

## Discussion

## **MA-50 Needs and Market Analysis Discussion**

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

Counties such as Bonner and Madison are areas where households with multiple housing problems are the most concentrated. Concentration, in this case, refers to counties with 10% of total households with any of the four housing problems over 39%.

Bonner County, for example, has nearly 17,390 households with any of 4 Housing Problems or nearly 40% of the total households in the county. Meanwhile, Madison County has over 10,300 households with any of the four major housing problems. Such number presents nearly 47% of all households in the county. Neighboring counties, such as Clark and Teton are also experiencing a high proportion of households with housing problems, with over 35% of the households in both counties experiencing one of the four housing problems.

See Unique Appendices for image.

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

Overall, the southern portion of the state of Idaho represents the highest concentration of minority and low-income households. Counties such as Canyon, for example, have been designated as R/ECAP<sup>i</sup> zones where the concentration of minority and low-income is highest in the state. Other counties, such as Clark, Power, Lincoln, Minidoka, and Jerome have a high percentage of Hispanic families. In this case, concentration refers to counties with 28% or more of Hispanic families.

See Unique Appendices for additional information and images.

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

Census tracts with higher Hispanic concentration are located in areas where agricultural plays a significant role in the local economy.

Overall, Census tracts with high non-White concentrations are also adjacent to Native American reservations.

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

This plan is for a state grantee. Communities submit their respective applications for funding of local projects, and each community defines the characteristics of the market in their respective community.

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



## ***State Grantee response 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.**

Reliable broadband infrastructure attracts businesses, connects people to educational opportunities, and enhances social life among a host of other contributions to quality of life. According to *broadbandnow.com/Idaho*<sup>1</sup> an estimated 21% of Idaho residents are underserved by broadband service providers, meaning they are either receiving unstable options, or minimal to no options at all. Those Counties that are most underserved are in the North part of the State: Shoshone, Clearwater, Idaho, and Camas Counties are notably underserved.

In November 2019, Idaho Department of Commerce approved the *Broadband Access is Imperative to Idaho* report. The report identifies plans, gaps, and strategies moving forward to increase the broadband access across the state.<sup>2</sup> The Task Force identified five (5) recommendations and calls-to action:

1. Update Broadband Plan
  - a. The State will identify places for public-private partnerships and will work to support maximum funding opportunities and coordination to expand broadband service across Idaho.
2. Establish a State Broadband Office
  - a. The Task Force is initially recommending one full time staff person in the office that may provide consumer education, facilitating opportunities and funding sources, and coordinate where Idaho can leverage existing infrastructure in efforts to expand broadband.
3. Consider State Funding Options
  - a. The Task Force recommends looking into ways to maximize existing funding and leverage new sources where possible and complement “one dig” or “one hang” projects where the most impact could be done with the fewest resources.
4. Improve deployment efficiency by formalizing “Dig Once” and “Hang Once” policies
  - a. Establish a state construction registry maintained by the State of Idaho for all upcoming transportation infrastructure projects and of existing available conduit in the public right of way and promote joint projects.
5. Engage on near term projects
  - a. Near term projects could have an immediate impact on unserved areas, those projects are:
    - i. North Central Idaho “open access” fiber network across five counties
    - ii. North-South pathway between Grangeville and Riggins

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<sup>1</sup> <https://broadbandnow.com/Idaho>

<sup>2</sup> [https://commerce.idaho.gov/content/uploads/2019/11/Broadband-Taskforce-Final\\_v3.pdf](https://commerce.idaho.gov/content/uploads/2019/11/Broadband-Taskforce-Final_v3.pdf)

- iii. I-90 corridor between town of Cataldo and the Idaho and Montana border
- iv. Melba

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

Competition among service providers keeps prices lower for consumers and presents options for a consumer so they may make choices that best suit their needs. Below is a map outlining Idaho access to providers offering broadband services. The speeds identified are 25Mbps download and 3Mbps upload – the minimum speeds to be considered broadband.

See Unique Appendices for Broadband Map.

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

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

According to the *State of Idaho Hazard Mitigation Plan 2018*<sup>3</sup> flood, earthquake, and wildfire are the most significant hazards in the state. These three types of hazards were found to be the greatest risk through analysis of historical data, past occurrences, and the result of the vulnerability and loss assessment, as well as integrating the results from the 2015 Idaho Multi-Hazard Risk Portfolio.

Other hazards are of risk, such as droughts and severe storms, however both of these may contribute to flooding and 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.**

Those low- and moderate-income households that are located in rural areas are at increased risk in emergency situations. Often there are fewer resources and deploying needed resources to rural areas may take longer to obtain, increasing risk. Chapter Four of the Hazard Mitigation Plan outlines the policies, programs, and capabilities of the state when considering hazard mitigation. To minimize risks for residents, the plan identifies the following as important aspects when considering vulnerability or resiliency to hazards:

- State and local building codes
- Subdivision regulations
- Comprehensive planning and zoning
- Floodplain zoning

Local jurisdictions should consider all of these issues when analyzing the risk of low- and moderate-income households.

School needs. Only 28% agreed that future funding prospects will meet the future needs of schools.

While Idaho continues to recover from the 2008 recession, we still can make additional progress when it comes to investment in Idaho public schools. The National Council on School Facilities estimates that Idaho has a projected annual gap of \$561 million for K-12 facilities responsibilities.

**Bridges** – (Grade = D) Idaho has identified needed repairs on 1,515 bridges, and the state estimates the cost of repair to these bridges will total \$2.2 billion. Over the last 10 years, the Idaho Transportation Department has been able to construct approximately 36 bridges per year and do major rehabilitation work on approximately 8 bridges per year, but funding for a quicker rate of rehabilitation and replacement is needed to lower the number of structurally deficient bridges in the state.

\*Source: ASCE 2018 Report Card

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<sup>3</sup> <https://ioem.idaho.gov/preparedness-and-protection/mitigation/state-hazard-mitigation-plan/>

# 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. IHFA and 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 *2019 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 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 is defined as Rural. There are only two Metropolitan Statistical areas (MSA) that are contained entirely within the State's boundaries. (there are 4 additional MSA's that have shared boundaries with the states of Washington and Utah). The geographical makeup includes two major mountain ranges, five major river systems, 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 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 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

Commerce will not target 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. They range from streets to public parks to housing for homeless to public infrastructure support for job growth. Based on these needs, Commerce has increased the CDBG funding percentage objective under the public facilities / infrastructure goal from the 2010 consolidated plan.

The CDBG delivery structure consisting 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.

Commerce does recognize a need to make some changes to the CDBG state agency rules (administrative code). Changes that Commerce will look to incorporate include:

- slightly decreasing match points available,
- increasing points for project readiness and preparedness,
- Combining the health and safety, housing, and social services categories and their separate pointing into one category instead of the three separate.
- Adding public parks to the senior / community center set-aside.

These changes should level the playing field for all applications under the public facilities set-aside.

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 do look to CDBG to help fill the financial gap in meeting the needs of their citizens.

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

### **Geographic Area**

**Table 21 - Geographic Priority Areas**

#### **General Allocation Priorities**

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

#### **HOME and HTF**

IHFA does not award HOME or HTF funds based on geographic distribution model or locally targeted areas. IHFA awards these funds statewide following a published NOFA or 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 for 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 in which the rental housing is located, must have a documented commitment to affirmatively furthering fair housing.

The HOME Program is designed to support community-based non-profit housing development organizations. These “CHDOs” are uniquely responsible to their individual communities to help identify and address local affordable housing needs.

#### **CDBG**

Idaho CDBG program 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 HUDs national objective.

#### **ESG**

ESG fund allocation is not currently determined by geographic distribution. Each year IHFA solicits requests for proposals throughout the state of Idaho. Agencies from all regions of the state are eligible to participate in a competitive application and selection process. Therefore, communities and regions are given the ability to lobby for the level of funding they deem appropriate as opposed to limiting the impact the ESG program may have on any particular region of the state. The BoS CoC is in conversation with the ID-500 CoC about potential changes to the ESG allocation specifically for their CoC’s geographic area.

## ESG and HOPWA Regions



## HTF Allocation Priorities

The Federal Housing Enterprises Financial Safety and Soundness Act of 1992 (The Act) as revised by HERA, provides for the distribution of funds to States based on four (4) need factors [24 CFR 93.51(a)-(d)] and a local construction cost adjustment factor [§93.51(e)]. Need factors include: (1) The relative shortage of rental housing available to Extremely low-income individuals and families; (2) relative shortage of rental housing available to Very low-income individuals and families; (3) the relative number of ELI renters living in substandard, overcrowded and/or unaffordable housing in Idaho; and (4) the relative number of Very Low-income renters living in substandard, overcrowded and/or unaffordable housing.

IHFA does not use a geographic distribution model to award HOME funds or allocate Low Income Housing Tax Credit, using instead a competitive application process. HTF funds will be awarded to qualified developer for eligible rental housing activities using a competitive application review and scoring process. However, to meet the HTF funding priority requirement, when a project meets one of the four funding priorities identified below, it will receive a priority funding preference. No single funding priority will have a higher preference than any other funding priority.

### **HTF Funding Priorities:**

- I. **Geographic Diversity**- The proposed project must meet A-C:
  - A. Minimum threshold criteria as defined in the annual Administrative Plan  
<https://www.idahohousing.com/documents/admin-plan-ch8-home-rental-activities-application.pdf>;
  - B. Project site complies with HUD Site and Neighborhood Standards [24 CFR Part 92.202 and §983.57(e)(2) (3)];
  - C. Project site located in an area/community defined as *rural* in the Administrative Plan  
<https://www.idahohousing.com/documents/admin-plan-ch1-overview.pdf>.
- II. **Applicant Capacity**- Owner/developer has proven ability to be ready to commit the HTF funds within 6 months of the award letter and to begin construction within 12 months;
- III. **Project-based Rental Assistance**- Project has Federal or local project-based rental assistance;
- IV. **Affordability Period Duration**- HUD requires repayment of all HTF funds invested in a project if, at anytime during the HTF Period of affordability (30 years), the assisted project fails to comply with HTF program requirement(s). Therefore, if IHFA chooses to impose a longer period of affordability, it will be recorded separately.
- V. **Leverage from Non-Federal Sources**- When HTF funds are the gap financing component in a proposed project, the HTF award will be contingent on funding approval by all other funding sources.



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

### Priority Needs

Table 22 – Priority Needs Summary

1	<b>Priority Need Name</b>	Create and Preserve Affordable Rental Housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Income Low Income Elderly (Age 62+) 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 2019 Idaho Housing Needs Assessment Survey 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.

	<b>Basis for Relative Priority</b>	<p>HOME</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 2019 Idaho Housing Needs Assessment Survey and the 2019 Idaho Housing, Demographic, and Transportation Report 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.</p> <p>Therefore, IHFA has determined when HTF funds are used to help create and preserve permanent rental housing for extremely-low income households [§93.20], 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 HTP- assisted units. Any tenant preference must not violate the non-discrimination laws and requirements identified at §93.350. Additionally, HTP-funded units must not limit or give preference to students [Limited Beneficiaries or Preferences- § 91.320(k)(5)(vii)].</p>
<b>2</b>	<b>Priority Need Name</b>	Create Decent Affordable Homeownership
	<b>Priority Level</b>	High
	<b>Population</b>	Low
	<b>Geographic Areas Affected</b>	State of Idaho
	<b>Associated Goals</b>	Provide Decent Affordable Housing

	<b>Description</b>	<p>Homebuyer Properties Activities</p> <ul style="list-style-type: none"> <li>• Acquisition and Rehabilitation</li> <li>• 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>	The 2019 Housing Needs Survey, input from the public (including units of local government, local regional and state level stakeholders), and the 2019 Idaho County-by-County Housing & Demographic data.
<b>3</b>	<b>Priority Need Name</b>	Public Facilities
	<b>Priority Level</b>	High
	<b>Population</b>	<p>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</p>
	<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 - health facilities, fire and EMT stations, fire trucks, senior centers, community centers, homeless shelters, child care centers, parks, youth centers, domestic shelters and non-residential historic.
	<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 that was conducted by Commerce July 2019.</li> <li>• The American Society of Civil Engineers, 2018 Report Card for Idaho's infrastructure was used to further assess non-housing community development needs.</li> <li>• Public participation was another method to determine need. No comments were received for the pre-draft consolidated plan. Comments for the final draft are.....</li> <li>• Prior five years of CDBG application submissions</li> </ul>
<b>4</b>	<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 that was conducted by Commerce Jul 2019.</li> <li>• The American Society of Civil Engineers, 2018 Report Card for Idaho's infrastructure was used to further assess non-housing community development needs.</li> <li>• Public participation was another method to determine need. No comments were received for the pre-draft consolidated plan. Comments for the final draft are.....TBD</li> <li>• Prior five years of CDBG application submissions</li> </ul>
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
	<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>	<p>The basis has been determined by four sources:</p> <ul style="list-style-type: none"> <li>• The local government needs survey that was conducted by Commerce in July 2019.</li> <li>• The American Society of Civil Engineers, 2018 Report Card for Idaho's infrastructure was used to further assess non-housing community development needs.</li> <li>• Public participation was another method to determine need. No comments were received for the pre-draft consolidated plan. Comments for the final draft are.....</li> <li>• Prior five years of CDBG application submissions</li> </ul>
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 that was conducted by Commerce in July 2019.</li> <li>• The American Society of Civil Engineers, 2018 Report Card for Idaho's infrastructure was used to further assess non-housing community development needs.</li> <li>• Public participation was another method to determine need. No comments were received for the pre-draft consolidated plan. Comments for the final draft are.....</li> <li>• Prior five years of CDBG application submissions</li> </ul>
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 that was conducted by Commerce in July 2019..</li> <li>• The American Society of Civil Engineers, 2018 Report Card for Idaho's infrastructure was used to further assess non-housing community development needs.</li> <li>• Public participation was another method to determine need. No comments were received for the pre-draft consolidated plan. Comments for the final draft are.....</li> <li>• Prior five years of CDBG application submissions</li> </ul>
8	<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>	The basis has been determined by the local government needs survey that was conducted by Commerce in July 2019.  No comments were received for the pre-draft consolidated plan.  Comments for the final draft are TBD
9	<b>Priority Need Name</b>	Homeless Shelter Operations & Prevention
	<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>	2019 Statewide Housing Needs Homeless Needs Assessment 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.

## Narrative (Optional)

### HOME and HTF

The Needs Assessment and Market Analysis sections of this Plan clearly describe the need for the following priority housing needs: The creation and preservation of affordable rental housing for low and extremely low income households, and gap financing for low-income single-family homebuyer housing. These priority housing needs are described in detail in this section.

### ESG

IHFA is a non-profit housing corporation created by the State of Idaho to receive and administer federal programs and resources. The State of Idaho does not own or provide housing or housing resources.

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. IHFA also provides housing and/or supportive services to households participating in the Housing Opportunities For Persons With HIV/AIDS (HOPWA) program. Homelessness is not a required program admittance requirement. HOPWA participants may receive permanent rental subsidies, along with individualized case management. While the CoC, ESG,

and HOPWA programs may serve vulnerable populations (elderly, frail elderly, persons with disabilities, etc.), the only specifically targeted subpopulations are HIV/AIDS and disabled. Limited resources and service providers, the lack of local financial support, and the rural make-up of Idaho make providing services and housing to non-homeless persons an extreme challenge. Further, the limited federal resources awarded to Idaho are to be targeted towards special needs and specific populations, such as the chronically homeless and veterans, which can make meeting the needs of non-homeless persons with CoC and ESG programs difficult.

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

### Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	
TBRA for Non-Homeless Special Needs	
New Unit Production	<p>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.</p>
Rehabilitation	<p>Based on IHFA's current Needs Assessment about 40% 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. 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.</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 23 – Influence of Market Conditions**

Extrapolation of American Community Survey data to future total households based on historical 2% increase each year		
2011-2013 ACS Estimates for Idaho		PY 2019
Total Housing Units	672,794	740,073
Total population in Occupied Units	583,452	641,797
Renter-Occupied %	31.3%	200,882
Homeowner-Occupied %	68.7%	400,914

#### Projected Rental and Homeowner Occupied Units

## ***SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)***

### **Introduction**

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

## Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	7,769,225	0	0	7,769,225	32,000,000	Over the next year it is expected CDBG funding will be used to construct or improve eligible public facilities, public infrastructure, housing related activities, and economic development activities specific to job creation or downtown improvements. These high priority activities will typically benefit populations including low-to-moderate income, families, rural, special needs, and non-housing community development

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	5,245,528	5,000,000	0	10,245,528	34,000,000	Homeowner rehabilitation and TBRA are not approved programs under IHFA HOME Program

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	1,110,270	0	0	1,110,270	4,441,080	Shelter Operations and services, homelessness prevention and rapid re-housing. Conversion and rehab of transitional housing is not an approved activity under IHFA's ESG Program.



Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	3,000,000	0	3,850,648	6,850,648	12,000,000	
Continuum of Care	public - federal	Admin and Planning Housing Rental Assistance Services Other	3,253,348	0	0	3,253,348	13,013,392	
Tax Credits	private	Multifamily rental new construction Multifamily rental rehab	5,026,120	0	0	5,026,120	20,104,480	Low-income Housing Tax Credits

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Tax Exempt Bond Proceeds	private	Acquisition Economic Development Multifamily rental new construction Multifamily rental rehab	321,775,000	0	0	321,775,000	1,287,100,000	The benefit to borrowers and projects that are eligible for tax-exempt bond financing is a lower interest rate as interest is earned is exempt from federal and state income taxes.
Other	private	Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services	1,010,270	0	0	1,010,270	4,041,080	Match may be Federal and State, but is primarily private funding

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - federal	Admin and Planning Services TBRA Other	93,637	0	0	93,637	374,548	Match is not currently a HOPWA program requirement; therefore, all contributions are considered leverage. Sources of HOPWA donations of time, expertise, and funds include public, private, grants, and Ryan White programs. Contributions to the HOPWA program offer HIV/AIDS prevention, medical care, HIV/AIDS treatment, HIV/AIDS medication assistance, case management, utility assistance, transportation, food assistance, among other activities.

Table 24 - Anticipated Resources

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

**CDBG**

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

With the projected \$37.5 million over 5 year period the Idaho Department of Commerce expects to receive in CDBG funding it is estimated a total of \$37 million annually from other local, State, Federal, and private sources will be partnered with the CDBG funded project.

**HOME**

Idaho's HOME program provides gap financing for IHFA-approved rental and homebuyer activities. The funds are leveraged with private loans and other federal funds. As the administrator of the Idaho's HOME Program, IHFA incurs a 25% match liability for every dollar of HOME entitlement funds expended on a housing activity. IHFA is able to satisfy this HOME match liability by banking eligible forms of match as defined at HOME CPD Notice 97-03.

The table does not identify the amount of HOME funds that will be used by IHFA for its administrative and planning costs and IHFA's HOME-CHDO Operating Assistance. IHFA is allowed to use a maximum 10% of all HOME funds for its administrative/planning costs and up to 5% for operating assistance grants for eligible CHDOs.

**HTF**

Idaho's HTF program provides gap financing for IHFA-approved rental activities. The units funded with HTF funds must serve households who earn at or below 30% AMI. IHFA's HTF funds will be leveraged with private loans and other Federal program funds as needed, to help ensure the activity remains viable during the 30-year minimum period of affordability.

**ESG**

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

**If appropriate, describe publically owned land or property located within the state 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-40 Institutional Delivery Structure – 91.315(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
IDAHO HOUSING AND FINANCE ASSOCIATION	Other	Homelessness Non-homeless special needs Ownership Rental	State
State of Idaho Dept of Commerce	Government	Economic Development Planning neighborhood improvements public facilities	State

Table 25 - Institutional Delivery Structure

### Assess of Strengths and Gaps in the Institutional Delivery System

See Grantees Unique Appendices.

### Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	
Legal Assistance	X		
Mortgage Assistance	X	X	
Rental Assistance		X	X
Utilities Assistance	X	X	X
<b>Street Outreach Services</b>			
Law Enforcement	X		
Mobile Clinics	X		
Other Street Outreach Services	X		
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	
Child Care	X		
Education	X		

Supportive Services			
Employment and Employment Training	X	X	
Healthcare	X		
HIV/AIDS	X	X	
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			
	X	X	X

Table 26 - Homeless Prevention Services Summary

**Describe the extent to which services targeted to homeless person and persons with HIV and mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdiction**

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

Due to the lack of a high concentration of individuals living with HIV/AIDS, funding, support, and awareness can limit the services and resources dedicated to this population. This is further exacerbated by Idaho's rural character. Small towns are not well equipped, if at all, to appropriately serve HIV/AIDS patients. This is evident in Table 49's demonstration of a lack of services targeting individuals with HIV/AIDS.

The second largest gap in service delivery is the absence of services which promote education and career growth. These services include child care, education, employment services, and legal assistance. While these services may be available in Idaho communities or regions, they oftentimes do not offer preference to homeless individuals or families.

When it comes to housing services, acceptance to rental assistance programs may be possible; however, landlord screening and backgrounds checks may restrict homeless households from attaining housing. Poor credit/rental history or a criminal record can prohibit someone from being selected from a pool of prospective tenants. This issue is currently exacerbated in some regions within Idaho due to very low vacancy rates.

The Continuum of Care network and structure which has been established is a huge contributor to Idaho's success in addressing homelessness issues. Although the BoS CoC covers a large geographical area, activities, efforts, service delivery, and fund allocation have been regionalized. This ensures that issues are addressed locally by those with hands on experience and exposure. This promotes local support, awareness, and advocacy. As each region experiences issues and setbacks, or is exposed to new situations, updates are presented to the BoS CoC governing body. The BoS CoC, in turn, distributes suggestions, guidance, and feedback to all regions across the state. As guidance from HUD is received regarding any particular situation, direction is offered to all. This improves the program knowledge and administrative competency of all agencies participating in the BoS CoC. Due to the scarce resources which may sometimes plaque certain regions or cities, most service providers are intimately aware of the resources available, how to access them, and what the eligibility criteria and process is which can, at times, make services more accessible than they may originally seem to an inquiring individual or family.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

IHFA implemented a Coordinated Entry System, Homeless Connect, in January 2018. Using the information gained through this system increases the BoS CoC's understanding and gaps in the institutional structure and service delivery system. The additional statistics will benefit developers and organizations seeking to add affordable housing to Idaho communities by providing accurate and irrefutable data on which areas are in the most need of homelessness preferences and the level and extent of supportive housing needed. IHFA, as representatives of the BoS CoC governing body, works extensively with regional housing coalitions with a focus on educating participating agencies on the importance of cultivating local effort to address the homeless issue in each region. The BoS CoC prepares an annual Homelessness Report distributed to lawmakers, stakeholders and others to increase awareness and seek out state and local support in combating and preventing homelessness. IHFA also conducts quarterly Regional Roundtables bringing together stakeholders to discuss needs and gaps and potential opportunities. Lastly, IHFA also conducts a bi-annual Housing and Economic Conference attends by several hundred stakeholders from throughout the state to address housing needs and to educate stakeholders.

IHFA is committing resources towards investigating successful Housing First models and projects currently operating in the western United States. This endeavor will consist of a planning and development team of IHFA department managers with knowledge and understanding of resources that have been found to be associated with Housing First implementations. IHFA will visit three to four agencies and multiple projects to study project development, access to and delivery of services, successful partnerships, reducing housing access barriers, financial structure, and the prioritization of homeless households. These visits, and potentially future visits, will also focus on effective coordinated entry systems and vulnerability assessments intended to identify those who will receive first priority.



IHFA has added points in their Tax Credit QAP and application to incentivize developers to include PSH units in their properties. This has been an effective strategy and has added much needed PSH units in tax credit properties in Idaho. Because of this success, IHFA plans to continue to include this incentive in future QAP's and Tax Credit applications. Additional efforts to promote development of housing that meets the needs of Idaho's homeless will be actively sought after.

## SP-45 Goals Summary – 91.315(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Facilities/Infrastructure-Compliance	2020	2024	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Housing related activities Planning Studies Public Facilities Public Infrastructure	CDBG: \$8,000,000	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

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Public Facilities/Infrastructure-Rehabilitation	2020	2024	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Cleanup of blighted properties Planning Studies Public Facilities Public Infrastructure	CDBG: \$9,600,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 85000 Persons Assisted  Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 120 Households Assisted  Rental units rehabilitated: 25 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Public Facilities/Infrastructure-New Construction	2020	2024	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development		Housing related activities Planning Studies Public Facilities Public Infrastructure	CDBG: \$8,000,000	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	2020	2024	Non-Housing Community Development		Economic Development	CDBG: \$3,200,000	Jobs created/retained: 250 Jobs  Other: 0 Other
5	Economic Development-Downtown Revitalization	2020	2024	Non-Housing Community Development		Cleanup of blighted properties Economic Development	CDBG: \$3,200,000	Other: 8 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Provide Suitable Living Environment	2020	2024	Homeless		Homeless Shelter Operations & Prevention Housing related activities	ESG: \$5,551,350 Continuum of Care: \$16,266,740 ESG Match: \$4,873,750 HOPWA Competitive Grant: \$468,185	Tenant-based rental assistance / Rapid Rehousing: 1500 Households Assisted  Homeless Person Overnight Shelter: 7500 Persons Assisted  Homelessness Prevention: 3300 Persons Assisted
7	Provide Decent Affordable Housing	2020	2024	Affordable Housing		Create Decent Affordable Homeownership Create and Preserve Affordable Rental Housing	HOME: \$25,245,528 HTF: \$15,000,000	Rental units constructed: 225 Household Housing Unit  Rental units rehabilitated: 30 Household Housing Unit  Homeowner Housing Added: 75 Household Housing Unit

**Table 27 – 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>25%</p> <p>Why 25%?</p> <p>First, for the state CDBG program, the Public Facilities/ Infrastructure- Compliance goal consists of a large diverse number of activities, therefore, by going with 25% it gives local governments a fair amount of flexibility to submit an application based on their Public Facilities/Infrastructure-Compliance needs. The original intent of the CDBG program was meant to not be a top down driven model.</p> <p>Second, over the last five years the CDBG percentage expended on public facilities/infrastructure-compliance was 27%. This met the 2015-19 Consolidated Plan's five year goal of expending at least 25% on the public facilities / infrastructure – compliance.</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 planning grant set-aside for facilities plans, which could fall within the public facilities/infrastructure compliance goal.</p> <p>Fourth, projects funding from this allocation priority will help to ensure Idaho Department of Commerce meets its 70% of funding to benefit low-to-moderate income requirement.</p>

2	Goal Name	Public Facilities/Infrastructure-Rehabilitation
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<b>Goal Description</b>	<p>Activities include rehabilitation, replacement or remodeling of a public facilities (infrastructure, community facilities, public utilities and affordable housing) systems.</p> <p>30% - Public Facility / Infrastructure – Rehabilitation</p> <p>Why 30?</p> <p>First, for the state CDBG program, the Public Facilities/Infrastructure- Rehabilitation. Consists of a large diverse number of activities, therefore, by going with 30% it gives local governments a fair amount of flexibility to submit an application based on their Public Facility/Infrastructure- Rehab needs. The original intent of the CDBG program, was not meant to be a top down driven model.</p> <p>Second, over the last five years the CDBG percentage expended on Public Facilities/Infrastructure-Rehab was 33%. This percentage was close to the 2015-19 Consolidated Plan’s five year goal of expending 30% on the Public Facilities /Infrastructure – Rehabilitation. In other words, the number of rehabilitation projects over the last five years was close to 30% so with no major changes to community needs or programmatic changes, there doesn't appear to be a need to change the percentage.</p> <p>Further rationale for 30%, is based on the results of the needs survey. Some of the activities identified with the highest needs were parks and recreation facilities, community centers, fire/EMT stations, water and sewer systems, see survey results. These activities could fall within the compliance goal. Supportive infrastructure activities for affordable housing could fall within this 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. Another reason for the 30% is that the needs survey indicated a high need for funding for facilities plans. Further the state broadband task force has indicated a need to assist in expanding broadband in rural communities, therefore, Commerce will look to create a separate planning / study grant set-aside which would encompass 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>Fourth, 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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3	<b>Goal Name</b>	Public Facilities/Infrastructure-New Construction
	<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>25% - Public Facility / Infrastructure – New Construction</p> <p>Why 25%?</p> <p>First, for the state CDBG program, the Public Facilities/Infrastructure-New Construction goal consists of a large diverse number of activities, therefore, by going with 25% it gives local governments a fair amount of flexibility to submit an application based on their Public Facility/Infrastructure-New Construction needs. The original intent of the CDBG program was not meant to be a top down driven model.</p> <p>Second, over the last five years the CDBG percentage expended on Public Facilities/Infrastructure-New Construction goal was 30%. This percentage was close to the 2015-19 Consolidated Plan’s five year goal of expending 25% on the Public Facilities /Infrastructure – New Construction. Therefore, since the number of new construction projects over the last five years was to close to 25%, so with no major changes to community needs for programmatic changes, there doesn't appear to be a need to change the goal percentage. Further the state broadband task force has indicated a need to assist in expanding broadband in rural communities, therefore, Commerce will look to create a separate planning / study grant set-aside which would encompass broadband feasibility studies. It is likely the activities under the planning / study grant set-aside could fall within the public facilities / infrastructure new construction goal.</p> <p>Third, projects funding from this allocation priority will help to ensure Idaho Department of Commerce meets its 70% of funding to benefit low-to-moderate income requirement.</p>

4	<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>10% - Job Creation</p> <p>Why 10%?</p> <p>No question job creation, especially higher paying jobs, is a need in Idaho. However, utilizing CDBG for job creation is not always user friendly for local governments and their partnering business due to environment review timelines, property acquisition standards, and job creation/retention requirements. Therefore, only a limited number of eligible job creation projects that are not in a fast tracking mode nor obligating a large percentage of private funds to the public infrastructure expansion, are an effective and efficient use of CDBG.</p> <p>Second, over the last five years the CDBG percentage expended on job creation was 3%. This percentage did not meet the 2015-19 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>10% - Downtown Revitalization</p> <p>Why 10%?</p> <p>Many smaller cities that are served by the CDBG program have seen retail box type businesses establish outside their downtown area which have pulled business and jobs out of their downtown core or have experienced a general lack of sustainable investment in the existing private buildings. In an effort to mitigate these elements and help keep small businesses downtown, some cities are looking to reinvest back into their downtowns. In part because it's a significant part of the community's sense of place, has existing infrastructure, and can also be a draw for tourism. Therefore, a demand exists to improve their downtown infrastructure, which typically includes ADA improvements.</p> <p>Over the last five years the CDBG percentage expended on downtown revitalization was 11% This met the 2015-19 Consolidated Plan's five year goal of expending 10% on the downtown revitalization priority. Whereas, the goal was met and the need remains high, Commerce will keep the goal at 10%. One of the reason 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>	<p>ESG program funds will be used for the following eligible activities: shelter, homelessness prevention, and rapid re-housing. IHFA's goal will be to, through collaboration with and participation in the Balance of State and Boise City/Ada County CoC's, continually impress a positive impact upon the homeless families and individuals in Idaho. As data collection evolves through HMIS and CoC innovations, ESG funds will be used in a manner that best fits the needs of those seeking the refuge it can offer.</p>

7	<b>Goal Name</b>	Provide Decent Affordable Housing
	<b>Goal Description</b>	<p>The total number of units constructed and rehabilitated shown in the <i>Goal Outcome Indicators</i> below includes 5 years rental unit production.</p> <p>Up to 10% of HOME and HTF allocations will be used for program administrative costs. HTF funds will not be used for homebuyer activities.</p>

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

#### HOME & HTF

Five-year estimates are based on estimated annual allocation amounts and the number of assisted units currently produced. Extremely-Low Income households (0-30% AMI)-**45** HOME & HTF units; Very-Low Income households(31-60% AMI) **210**-HOME only; and Low-Income(61-80% AMI )- **75** HOME only.

Special needs program estimates are based on recent program allocation amounts and may fluctuate based on the number of special needs assisted units and future program funding. IHFA estimates providing ESG assistance to over 3,200 individuals per PY, CoC assistance to over 1,100 individuals per PY, and HOPWA assistance to over 200 individuals per PY. All participants of CoC, HOPWA, and ESG shelter and rapid re-housing (approximately 3,700 individuals) have income of anywhere from 0 to 50% AMI (very-low income). ESG homelessness prevention participants (approximately 291 individuals) have income of less than 30% AMI (extremely-low income).

## **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)**

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 local governing boards responsible for appointing the governing structure of the local Public Housing Authority (PHA) and direct PHA activities.

IHFA administers the Veterans Affairs Supportive Housing program for homeless veterans and 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 program that assists non-elderly persons with disabilities who are transitioning out of institutions or homelessness for whom security deposits and modifications for accessibility would be a barrier to successful leasing. IHFA will continue to apply for this funding.

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

With this consideration a description of efforts to foster public housing resident initiatives during the 2020 program year are as follows:

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. Presently, 44 participants have been successful in purchasing homes using Section 8 Housing Choice Vouchers to provide mortgage payment subsidy on a long-term basis.

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**

Response exceeds maximum allowable characters- See Unique Appendices.

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

See Unique Appendices

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

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

Traditionally, sixty percent (60%) of ESG funds have been directed towards emergency shelter activities. This provides financial support for operational costs and services within the nineteen (19) facilities statewide receiving ESG shelter funds. The remaining forty percent (40%) of ESG funds are distributed to nine (9) agencies statewide for homelessness prevention and rapid re-housing activities. To determine homelessness prevention and rapid re-housing awards, a proportionate fund allocation is determined using a formula that incorporates five regional factors, including population, percentage of households at or below 30% of the area median income, unemployment rate, Point In Time count results, and bed utilization. All ESG awards take competitive application scoring into consideration when making final awards to subrecipients.

Additionally, Continuum of Care bodies include representation from a currently or previously homeless individual. The inclusion of individuals with firsthand experience is extremely valuable in adding insight regarding the needs of those with lived experience with homelessness into policy decision making. Although the BoS CoC spans across 43 of Idaho's 44 counties and ESG serves all of Idaho, the organizational structure successfully pools the knowledge, experience, and encounters of all those participating. This collection of individuals closely connected to the issue of homelessness provides invaluable insight into the housing needs and services of the homeless individuals they serve.

Each shelter and homelessness provider implement their own marketing strategies to ensure that their services are known to those in need of the services offered, and are easily accessible. All program subrecipients and sponsors are encouraged to perform outreach within their community to increase project awareness and access. Outreach may include attending local service provider meetings, partnering with local agencies to pair resources, attending homeless stand down events, locating offices in accessible and visible locations, ensuring community provider lists include current agency information, locating and engaging with homeless individuals, among other efforts.

The coordinated entry system helps ensure that the BoS CoC is using resources strategically to target specific homeless sub-populations and to identify successful models and projects and any system gaps that may exist. The BoS CoC has a Coordinated Entry Committee that oversees the continuum's strategic plan for coordinated entry.

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

The need for emergency shelter services is high in Idaho. For this reason, sixty percent (60%) of ESG funds are committed to shelter activities. The distribution of these funds is determined based on the agencies that respond to the funding availability notice and the scoring of each project's application. This allows agencies to demonstrate their capacity to administer grant funds and experience in serving the homeless population. The BoS CoC is also addresses the needs of homeless persons by recognizing the benefit and success of rapid re-housing programs. Although this is a form of permanent housing, it is time restricted and can be used as a more efficient alternative to transitional housing. Higher



efficiencies computes to more people being served.

The BoS CoC currently funds 19 CoC projects specifically targeting homeless individuals and/or families. Services are oftentimes associated with these housing projects to ensure individuals and families receive the resources needed to obtain permanent housing, if necessary, and achieve self-sufficiency, if possible.

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

In the absence of appropriate and effective intervention efforts and resources, many families and individuals will become homeless as life changes such as loss of employment, lack of affordable housing, loss of support networks, exit from an institution or facility, and other severe circumstances present themselves. For those that experience these misfortunes, recovery can be extremely difficult when disability, controlled substance or alcohol dependency, or other extreme circumstances exist. Certain individuals may require more permanent support and services, traditionally associated with permanent housing. The BoS CoC has made permanent housing a priority while serving Idaho's homeless population. Of the 30 BoS CoC housing projects currently operating, 17 are offering permanent housing options to homeless families and individuals.

IHFA and the BoS CoC acknowledges and supports the commitment to preventing and ending homelessness displayed by HUD through Opening Doors. Whether a participant receives housing and service support through ES, RRH or permanent housing, each agency strives to individualized goal-based service planning to increase the likelihood for success long-term success, including self-sufficiency; ensure access to situations that offer a permanent housing plan; and establish support networks and habits that reduce the likelihood of recidivism. These efforts are especially crucial in transitional and rapid re-housing programs to increase the chance of individuals with an opportunity for self-sufficiency to succeed in the goals for independence. The BoS CoC placed an emphasis on rapid re-housing during the 2019 Continuum of Care Competition. This emphasis is designed to shorten the length of time homeless individuals and families experience homelessness.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

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

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

Putting these goals and strategies into action will increase the probability that those needing assistance will improve their housing stability and reduce their risk of experiencing future episodes of homelessness.

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

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

Response exceeds maximum allowable characters. See Unique Appendices

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

Response exceeds maximum allowable characters. See Unique Appendices

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

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

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

#### **IHFA**

Small Business Loan Program-Funding for this Program is provided by the U.S. Department of 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 Idaho Housing and Finance Association. 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, 583 collateral deposit accounts have been established to assist Idaho small business owners in securing over \$380 million in private lender loans.

Idaho Department of Health and Welfare addressing processes and procedures that challenge clients' ability to enroll in and retain key work supports, improve childcare eligibility policies along with Idaho Child Care Program (ICCP) business processes and technology by building on successes in SNAP, Medicaid, and cash assistance programs.

Better integrate Idaho's work support programs (including SNAP, Medicaid, and ICCP) to streamline benefit renewal for eligible families and, thus, to support improved outcomes for these families.

Increase the productivity of the department's 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 program are eligible to be part of Idaho Housing's Family Self-Sufficiency (FSS) Program, a voluntary program that helps families become economically independent during the 5-year contract of participation. FSS assists participating families in setting individualized training and service goals, serves to provide case management services that link them to community resources and aims to help them overcome barriers to gainful employment. FSS participants also have the opportunity to accrue money in an interest-

bearing escrow savings account as their earned income grows and their rent portion responsibility increases, leading them toward self-sufficiency. When they have completed their self-sufficiency goals, and have been free of welfare for 12 months, the family is eligible to graduate the program successfully and is awarded their escrow earnings.

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 opportunities for low-income residents and business entities. Section 3 outreach requirements are determined by 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 Annual Administrative Plan and are included in HOME written agreements, 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.

#### **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 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. HUB zones are historically underutilized business zones that typically have higher rates of unemployment or lower per capita income than national levels.

### **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*.



## **Expected Resources**

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

#### **Introduction**

Idaho Housing and Finance Association is the Allocating Agency for Idaho's Low-Income Tax Credit program (LIHTC), the designated Administrator for Idaho's HOME Investment Partnership Program, National Housing Trust Fund Program, Neighborhood Stabilization Program,

nd the Emergency Solutions Grant Program. The Idaho Department of Commerce is the designated Administrator of Idaho's CDBG Program.

### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	7,769,225	0	0	7,769,225	32,000,000	Over the next year it is expected CDBG funding will be used to construct or improve eligible public facilities, public infrastructure, housing related activities, and economic development activities specific to job creation or downtown improvements. These high priority activities will typically benefit populations including low-to-moderate income, families, rural, special needs, and non-housing community development

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	5,245,528	5,000,000	0	10,245,528	34,000,000	Homeowner rehabilitation and TBRA are not approved programs under IHFA HOME Program

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	1,110,270	0	0	1,110,270	4,441,080	Shelter Operations and services, homelessness prevention and rapid re-housing. Conversion and rehab of transitional housing is not an approved activity under IHFA's ESG Program.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	3,000,000	0	3,850,648	6,850,648	12,000,000	
Continuum of Care	public - federal	Admin and Planning Housing Rental Assistance Services Other	3,253,348	0	0	3,253,348	13,013,392	
Tax Credits	private	Multifamily rental new construction Multifamily rental rehab	5,026,120	0	0	5,026,120	20,104,480	Low-income Housing Tax Credits

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Tax Exempt Bond Proceeds	private	Acquisition Economic Development Multifamily rental new construction Multifamily rental rehab	321,775,000	0	0	321,775,000	1,287,100,000	The benefit to borrowers and projects that are eligible for tax-exempt bond financing is a lower interest rate as interest is earned is exempt from federal and state income taxes.
Other	private	Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services	1,010,270	0	0	1,010,270	4,041,080	Match may be Federal and State, but is primarily private funding

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - federal	Admin and Planning Services TBRA Other	93,637	0	0	93,637	374,548	Match is not currently a HOPWA program requirement; therefore, all contributions are considered leverage. Sources of HOPWA donations of time, expertise, and funds include public, private, grants, and Ryan White programs. Contributions to the HOPWA program offer HIV/AIDS prevention, medical care, HIV/AIDS treatment, HIV/AIDS medication assistance, case management, utility assistance, transportation, food assistance, among other activities.

Table 28 - Expected Resources – Priority Table

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

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

With the projected \$37.5 million over 5 year period the Idaho Department of Commerce expects to receive in CDBG funding it is estimated a total of \$37 million annually from other local, State, Federal, and private sources will be partnered with the CDBG funded project.

Idaho's HOME program provides gap financing for IHFA-approved rental and homebuyer activities. The funds are leveraged with private loans and other federal funds. As the administrator of the Idaho's HOME Program, IHFA incurs a 25% match liability for every dollar of HOME entitlement funds expended on a housing activity. IHFA is able to satisfy this HOME match liability by banking eligible forms of match as defined at HOME CPD Notice 97-03.

The table does not identify the amount of HOME funds that will be used by IHFA for its administrative and planning costs and IHFA's HOME-CHDO Operating Assistance. IHFA is allowed to use a maximum 10% of all HOME funds for its administrative/planning costs and up to 5% for operating assistance grants for eligible CHDOs.

#### HTF

Idaho's HTF program provides gap financing for IHFA-approved rental activities. The units funded with HTF funds must serve households who earn at or below 30% AMI. IHFA's HTF funds will be leveraged with private loans and other Federal program funds as needed, to help ensure the activity remains viable during the 30-year minimum period of affordability.

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





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

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

## **Discussion**

## Annual Goals and Objectives

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

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Facilities/Infrastructure-Compliance	2020	2024	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Housing related activities Public Facilities Public Infrastructure	CDBG: \$1,859,037	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 12000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 12 Households Assisted
2	Public Facilities/Infrastructure-Rehabilitation	2020	2024	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Housing related activities Public Facilities Public Infrastructure	CDBG: \$2,230,844	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 17000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 24 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Public Facilities/Infrastructure-New Construction	2020	2024	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development		Public Facilities Public Infrastructure	CDBG: \$1,859,037	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 12000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 12 Households Assisted
4	Economic Development-Job Creation	2020	2024	Non-Housing Community Development		Economic Development	CDBG: \$743,615	Jobs created/retained: 50 Jobs Businesses assisted: 2 Businesses Assisted
5	Economic Development-Downtown Revitalization	2020	2024	Non-Housing Community Development		Cleanup of blighted properties Economic Development	CDBG: \$743,615	Other: 2 Other
6	Provide Suitable Living Environment	2020	2024	Homeless		Homeless Shelter Operations & Prevention Housing related activities	ESG: \$1,110,270 Continuum of Care: \$3,253,348 ESG Match: \$1,010,270	Tenant-based rental assistance / Rapid Rehousing: 310 Households Assisted Homeless Person Overnight Shelter: 1516 Persons Assisted Homelessness Prevention: 665 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Provide Decent Affordable Housing	2020	2024	Affordable Housing		Create Decent Affordable Homeownership Create and Preserve Affordable Rental Housing	HOME: \$10,245,528	Rental units constructed: 45 Household Housing Unit Rental units rehabilitated: 6 Household Housing Unit Homeowner Housing Added: 15 Household Housing Unit

Table 29 – 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>25%</p> <p>Why 25%?</p> <p>First, for the state CDBG program, the Public Facilities/ Infrastructure- Compliance goal consists of a large diverse number of activities, therefore, by going with 25% it gives local governments a fair amount of flexibility to submit an application based on their Public Facilities/Infrastructure-Compliance needs. The original intent of the CDBG program was meant to not be a top down driven model.</p> <p>Second, over the last five years the CDBG percentage expended on public facilities/infrastructure-compliance was 27%. This met the 2015-19 Consolidated Plan's five year goal of expending at least 25% on the public facilities / infrastructure – compliance.</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 rehabilitation, replacement or remodeling of a public facilities (infrastructure, community facilities, public utilities and affordable housing) systems.</p> <p>30% - Public Facility / Infrastructure – Rehabilitation</p> <p>Why 30?</p> <p>First, for the state CDBG program, the Public Facilities/Infrastructure- Rehabilitation. Consists of a large diverse number of activities, therefore, by going with 30% it gives local governments a fair amount of flexibility to submit an application based on their Public Facility/Infrastructure- Rehab needs. The original intent of the CDBG program, was not meant to be a top down driven model.</p> <p>Second, over the last five years the CDBG percentage expended on Public Facilities/Infrastructure-Rehab was 33%. This percentage was close to the 2015-19 Consolidated Plan’s five year goal of expending 30% on the Public Facilities /Infrastructure – Rehabilitation. In other words, the number of rehabilitation projects over the last five years was close to 30% so with no major changes to community needs or programmatic changes, there doesn't appear to be a need to change the percentage.</p> <p>Further rationale for 30%, is based on the results of the needs survey. Some of the activities identified with the highest needs were parks and recreation facilities, community centers, fire/EMT stations, water and sewer systems, see survey results. These activities could fall within the compliance goal. Although streets and sidewalks were identified as high needs it would be difficult for these activities to meet a required low-to-moderate income national objective and subsequently the rehabilitation goal. Supportive infrastructure activities for affordable housing could fall within this goal. Another reason for the 30% is that the needs survey under planning studies indicated a high need for funding for facilities plan and a recent state broadband task force has indicated a need to assist in expanding broadband in rural communities, therefore, Commerce will look to create a separate planning / study grant set-aside which would include facilities planning studies and broadband feasibility studies. It is likely the activities under the planning / study grant set-aside could fall within the public facilities / infrastructure rehabilitation goal.</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-New Construction
	<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>25% - Public Facility / Infrastructure – New Construction</p> <p>Why 25%?</p> <p>First, for the state CDBG program, the Public Facilities/Infrastructure-New Construction goal consists of a large diverse number of activities, therefore, by going with 25% it gives local governments a fair amount of flexibility to submit an application based on their Public Facility/Infrastructure-New Construction needs. The original intent of the CDBG program was not meant to be a top down driven model.</p> <p>Second, over the last five years the CDBG percentage expended on Public Facilities/Infrastructure-New Construction goal was 30%. This percentage was close to the 2015-19 Consolidated Plan’s five year goal of expending 25% on the Public Facilities /Infrastructure – New Construction. Therefore, since the number of new construction projects over the last five years was to close to 25%, so with no major changes to community needs for programmatic changes, there doesn't appear to be a need to change the goal percentage. Further, the state broadband task force has indicated a need to assist in expanding broadband in rural communities, therefore, Commerce will look to create a separate planning / study grant set-aside which would include broadband feasibility studies. It is likely the activities under the planning / study grant set-aside could fall within the public facilities / infrastructure new construction goal.</p> <p>Third, projects funding from this allocation priority will help to ensure Idaho Department of Commerce meets its 70% of funding to benefit low-to-moderate income requirement.</p>



4	<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>10% - Job Creation</p> <p>Why 10%?</p> <p>No question job creation, especially higher paying jobs, is a need in Idaho. However, utilizing CDBG for job creation is not always user friendly for local governments and their partnering business due to environment review timelines, property acquisition standards, and job creation/retention requirements. Therefore, only a limited number of eligible job creation projects that are not in a fast tracking mode nor obligating a large percentage of private funds to the public infrastructure expansion, are an effective and efficient use of CDBG.</p> <p>Second, over the last five years the CDBG percentage expended on job creation was 3%. This percentage did not meet the 2015-19 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>10% - Downtown Revitalization</p> <p>Why 10%?</p> <p>Many smaller cities that are served by the CDBG program have seen retail box type businesses establish outside their downtown area which have pulled business and jobs out of their downtown core or have experienced a general lack of sustainable investment in the existing private buildings. In an effort to mitigate these elements and help keep small businesses downtown, some cities are looking to reinvest back into their downtowns. In part because it's a significant part of the community's sense of place, has existing infrastructure, and can also be a draw for tourism. Therefore, a demand exists to improve their downtown infrastructure, which typically includes ADA improvements.</p> <p>Over the last five years the CDBG percentage expended on downtown revitalization was 11% This met the 2015-19 Consolidated Plan's five year goal of expending 10% on the downtown revitalization priority. Whereas, the goal was 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>	The ESG program will serve a minimum of 1,500 households with shelter, homeless prevention and rapid re-housing funds.
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 2020 Program Year.



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

### Introduction:

During PY 2020 IHFA will award HOME funds to eligible applicants to construct, acquire and/or rehabilitate permanent rental housing to help meet Idaho's rental housing needs. IHFA will award HOME funds to eligible nonprofits and qualified units of local government to construct, acquire and rehabilitate single-family units to be sold to HOME-eligible and IHFA qualified low-income homebuyers, based on market need.

### Funding Allocation Priorities

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

Table 30 – Funding Allocation Priorities

## **Reason for Allocation Priorities**

CDBG- See AP20 Goals 2,3,4,5 and 6 goal descriptions.

HOME & HTF - The *2019 Idaho Housing Needs Survey*, the 2019 Idaho County by County Demographic & Housing 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 with children is Idaho's highest priority housing needs. This is followed closely by affordable homebuyer housing.

ESG - Other than funding from faith-based organizations and Federal programs, Idaho's homeless housing and service programs receive very little financial support. In the absence of much needed emergency shelter funding, many individuals and families are unable to receive temporary assistance and reprieve from homelessness, and access to services to assist in being rapidly re-housed. For this reason, Idaho has directed the maximum amount of ESG funds allowed by HUD regulations (60%) towards emergency shelter activities. The remaining forty percent (40%) is used for homelessness prevention and rapid re-housing activities, with an emphasis placed on rapid re-housing. The additional emphasis is imposed due to IHFA's desire, and HUD precedence within the Homelessness Prevention and Rapid Re-Housing Program (HPRP) program which was born out of the American Recovery and Reinvestment Act of 2009, to divert individuals out of homelessness and shorten shelter stays.

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

CDBG- See AP20 Goals 2,3,4,5 and 6 goal descriptions.

HOME- Following a published NOFA process, IHFA accepts applications for rental housing project activities throughout the state of Idaho. Each application will be reviewed for compliance with regulatory requirements and IHFA preferences. Approved HOME activities must have documented market need and long-term feasibility for the type of housing proposed and the proposed population. IHFA estimates it will award approximately 60% of the 2020 HOME allocation and 100% of the 2020 HTF allocation plus HOME program income to the creation and preservation of permanent affordable rental housing in Idaho.

IHFA will accept single-family homebuyer activity proposals from qualified nonprofits and units of local government, following a published

RFP(Request For Proposal) process for the new construction or acquire and rehabilitation single-family units, to be sold to IHFA qualified, HOME-eligible low and very-low income homebuyers throughout Idaho. At the sale of the unit, homebuyers assume a portion of the developer's loan as downpayment/closing cost assistance. IHFA estimates it will award approximately 40% of the 2020 HOME allocation and program income to this activity.

ESG - Prior to the Hearth Act, Idaho allocated the majority of ESG funds to homeless shelter activities. While IHFA still places on emphasis on the importance of supporting shelter activities, which currently receives sixty percent (60%) of the annual award, this decreased upon Hearth Act implementation due to limitations imposed. The remaining forty percent (40%) has been reserved for homelessness prevention and rapid re-housing activities, with majority support directed towards rapid re-housing. Due to the changes in program regulations and need to prioritize resources in a new manner, 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. For that reason, IHFA would like to see at least consistent impact on Idahoans served. 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.

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

### Introduction:

Idaho Department of Commerce- State of Idaho's CDBG Program

Idaho Housing and Finance- State of Idaho's HOME Program

Idaho Housing and Finance- State of Idaho's National Affordable Housing Trust Fund

Idaho Housing and Finance- State of Idaho's Emergency Solutions Grant

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

### Distribution Methods

**Table 31 - Distribution Methods by State Program**

<b>1</b>	<b>State Program Name:</b>	HOME Homebuyer Properties Activities
	<b>Funding Sources:</b>	HOME

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>Funding proposal are submitted by qualified units of local government and/or non-profit organizations following a published Request for Proposal(RFP). Eligible activities under this program include the acquisition and rehabilitation of substandard condition single-family units and the new construction of single-family units to be sold to a qualified HOME-eligible, IHFA-qualified, low-income homebuyer, when completed. The sales price to the low-income homebuyer cannot exceed the HOME Homeownership value limits for the area in which the unit is located.</p> <p>The homebuyers are evaluated in the same manner as identified under the HOME Down Payment/Closing Cost Assistance Program(see above). The sales price to the homebuyer cannot exceed the applicable HOME Homeownership Value Limits for the area.</p> <p>The homebuyer must reside in the HOME-assisted unit as a principal residence, as defined in the HOME Administrative Plan, during the HOME period of affordability or repay the HOME loan in full. The HOME period of affordability is determined by the amount of direct assistance the homebuyer receives. The homebuyer is able to sell the HOME-assisted unit at any time, to any willing buyer, for whatever price the market will bear. At transfer of title, IHFA will attempt to recapture the full amount of the HOME loan from the net proceeds of the sale as defined under the HOME Program's Recapture Option §92.254 (a)(ii)(A)(4 and 5).The maximum amount of DPCC available to a homebuyer will be determined on an annual basis and published in the annual HOME Administrative Plan.</p> <p>An eligible homebuyer(s) must document household income <math>\leq 80\%</math> AMI as defined by 24 CFR 5.609 (Annual Income), have US citizenship or other eligibility status, have limited liquid assets as defined in the HOME Administrative Plan.</p> <p>The single-family unit must be an eligible property type. If the unit was constructed prior to January 1, 1978, the rehab activity must comply with EPA and HUD Lead-Based paint disclosures, inspections, assessments, and lead hazard reduction requirements.</p> <p>The initial acquisition and the final sale to the homebuyer, the transaction must document the purchase offer agreement complies with HUD-ER requirements, Uniform Relocation Act and Voluntary Sales Disclosure, as well as other applicable federal and state cross-cutting regulations.</p>
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		HOME Match is only considered eligible under this activity, if the amount of the match contribution reduces the sales price to the homebuyer or enables the house to be sold for less than the development costs by an amount equal to the match contribution.
	<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	<p>Following a published Request for Proposals, nonprofit developers submit will submit a funding proposal(s). IHFA posts the proposal requirements, which are updated annually, on the IHFA website. Proposals must meet the submission requirements, which include the following criteria:</p> <ul style="list-style-type: none"> <li>• The most important criteria is the nonprofit's evidence of organizational and development capacity to undertake the type, size, and scope of the proposed activity, IRS tax exempt status, evidence of good standing with the State of Idaho and IHFA, and a market analyses that indicates a need for the type and scope of the proposed activity. Does the owner-developer have current activities underway? If so, are they meeting developmental milestones as proposed, and is the project under, on, or over budget.</li> <li>• The activity(s): Does the proposed activity meet IHFA annual housing and funding goals for the program year, i.e. new construction vs rehabilitation, number of proposed units, other funding sources, and total funds requested. Second, are the costs necessary and reasonable compared to other similar projects. And finally, will the estimated market value of the property(s) when completed, be greater than or less than the amount of funds expended to develop the unit(s).</li> </ul>
	<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>	N/A

<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available</b></p> <p><b>to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></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></p>	
<p><b>Describe how resources will be allocated among funding categories.</b></p>	N/A
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>HOME funds are awarded as a 0% interest, due-on-sale, loan. The maximum amount of funds available on a per-unit basis, will not exceed the HOME Maximum Per-Unit Subsidy Limits in effect at the time the funds are committed to the project. Threshold factors are described in detail at "<i>Describe all of the criteria that will be used to select applications and the relative importance of these criteria</i>" in AP-30, above.</p>

	<b>What are the outcome measures expected as a result of the method of distribution?</b>	It is estimated that 15 Homebuyer properties (single-family units) will be constructed or rehabilitated then sold to qualified low-income homebuyers.
<b>2</b>	<b>State Program Name:</b>	HOME Rental Housing Production
	<b>Funding Sources:</b>	HOME
	<b>Describe the state program addressed by the Method of Distribution.</b>	<p>Following a published NOFA, private and non-profit housing 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/HTF) or a grant (HTF only), depending on the type of project, other programs involved in the project, and the type of preference tenant population(s) served. HOME and/or HTF funds are not committed to any activity until it has received the appropriate level of environmental clearance and all sources of financing in the project have been reasonably secured. IHFA's HOME and HTF programs are designed to work with a variety 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 can 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 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>

<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	HOME and 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.
<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>	N/A
<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>	N/A

	<b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b>	
	<b>Describe how resources will be allocated among funding categories.</b>	<p>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.</p> <p>100% of Idaho's HTF funds will be used for rental housing production and preservation. The funds will target extremely low-income (<math>\leq 30\%</math> AMI) households.</p>
	<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>	61 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 $\leq 30\%$ 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 CDBG
	<b>Funding Sources:</b>	CDBG
	<b>Describe the state program addressed by the Method of Distribution.</b>	When this section of the Consolidated Plan is converted to a Word document for publishing purposes, the current version of the eCon Planning Suite cuts off a portion of the CDBG response. Accordingly, the State of Idaho CDBG Program section and all responses required below are found in the <u><b>Unique Appendices.</b></u>

<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>When this section of the Consolidated Plan is converted to a Word document for publishing purposes, the current version of the eCon Planning Suite cuts off a portion of the CDBG response. Accordingly, the State of Idaho CDBG Program section and all responses required below are found in the Unique Appendices.</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>When this section of the Consolidated Plan is converted to a Word document for publishing purposes, the current version of the eCon Planning Suite cuts off a portion of the CDBG response. Accordingly, the State of Idaho CDBG Program section and all responses required below are found in the Unique Appendices.</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>	
	<b>Describe how resources will be allocated among funding categories.</b>	When this section of the Consolidated Plan is converted to a Word document for publishing purposes, the current version of the eCon Planning Suite cuts off a portion of the CDBG response. Accordingly, the State of Idaho CDBG Program section and all responses required below are found in the Unique Appendices.
	<b>Describe threshold factors and grant size limits.</b>	When this section of the Consolidated Plan is converted to a Word document for publishing purposes, the current version of the eCon Planning Suite cuts off a portion of the CDBG response. Accordingly, the State of Idaho CDBG Program section and all responses required below are found in the Unique Appendices.
	<b>What are the outcome measures expected as a result of the method of distribution?</b>	When this section of the Consolidated Plan is converted to a Word document for publishing purposes, the current version of the eCon Planning Suite cuts off a portion of the CDBG response. Accordingly, the State of Idaho CDBG Program section and all responses required below are found in the Unique Appendices.
<b>4</b>	<b>State Program Name:</b>	State of Idaho ESG
	<b>Funding Sources:</b>	ESG

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>IHFA’s ESG subrecipients are chosen through a competitive statewide application process. This process includes the following elements:</p> <ul style="list-style-type: none"> <li>• Funding availability announced in Idaho newspapers in each region of the state soliciting project applications from interested state or local governments and non-profit organizations.</li> <li>• In 2019, 28 applications were submitted for review by the Independent Review Panel (IRP). Persons with experience in issues related to homelessness were recruited to serve on the IRP. The reviewers are responsible for rating applications using criteria provided by IHFA.</li> <li>• Members of the IRP score each proposal individually before meeting to reconcile and average all panelists’ scores. The resulting averaged score reflects the Panel’s collective determination of merit. All applications meeting a threshold score determined by a weighted average were funded.</li> </ul> <p>When special/additional funding is made available to the ESG program, the Recipient will allocate those funds through an internal process to expedite the award. Factors affecting this distribution may include timing of the award, timeliness of expenditures, performance, need, and HUD or CoC priorities</p>
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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>In order to secure ESG funding, applicants must satisfy several threshold requirements, including sufficient match commitment, participation in Coordinated Entry, participation in HMIS or a comparable database, compliance with Federal Education requirements (under 42 USC 11431 et seq.), and current registration with SAM and the Idaho Secretary of State. They must also confirm that they are not a federally debarred contractor, that they are a 501(c)(3), and that they have no outstanding federal debt.</p> <p>Agencies must also operate under Housing First principles.</p> <p>If they meet all the above criteria, their applications are reviewed by an Independent Review Panel of community members, who use a predetermined set of scoring criteria to evaluate each question. The decision-making process for funding is based on the following criteria, listed in order of importance:</p> <ul style="list-style-type: none"> <li>• The Independent Review Panel score of their application</li> <li>• The agency’s background, including history of service and population served; this also includes the agency’s proven ability to administer grant funds</li> <li>• Emergency Solutions needs and/or the service gaps the project would address (Geographical and special population needs are both considered)</li> <li>• Stated goals and objectives and how they would be achieved</li> <li>• Outcome measurements and documentation of past accomplishments</li> </ul>
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<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>
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<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>IHFA’s ESG sub-grantees are chosen through a competitive statewide application process. This process includes the following elements:</p> <ul style="list-style-type: none"> <li>• Funding availability announced in Idaho newspapers in each region of the state soliciting project applications from interested state or local governments and non-profit organizations.</li> <li>• In 2019, 28 applications were submitted for review by the Independent Review Panel (IRP). Persons with experience in issues related to homelessness were recruited to serve on the IRP. The reviewers are responsible for rating applications using criteria provided by IHFA.</li> <li>• Members of the IRP score each proposal individually before meeting to reconcile and average all panelists’ scores. The resulting averaged score reflects the Panel’s collective determination of merit. All applications meeting a threshold score determined by a weighted average were funded. The following includes a summary of the six vital areas that serve as the basis for funding approval:</li> <li>• Funding availability is announced in Idaho newspapers in each region of the state, soliciting project applications from interested state or local governments and nonprofit organizations.</li> <li>• In 2018, 27 applications were submitted for review to an Independent Review Panel (IRP). Individuals with nonprofit grant evaluation experience were recruited to serve on the IRP. The reviewers are responsible for rating applications using criteria provided by IHFA.</li> <li>• Members of the IRP score each proposal individually before meeting to reconcile and average all panelists’ scores. The resulting averaged score reflects the Panel’s collective determination of merit. All applications meeting a threshold score determined by a</li> </ul>
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		<p>weighted average were funded. The following areas serve as the basis for funding approval:</p> <ul style="list-style-type: none"> <li>• The Independent Review Panel score of their application</li> <li>• The agency's background, including history of service and population served; this also includes the agency's proven ability to administer grant funds</li> <li>• Emergency Solutions needs and/or the service gaps the project would address (Geographical and special population needs are both considered)</li> <li>• Stated goals and objectives and how they would be achieved</li> <li>• Outcome measurements and documentation of past accomplishments</li> <li>• From the rating process, in 2018, 16 agencies were awarded conditional funding to provide shelter services and operations, and 9 agencies were awarded homelessness prevention or rapid re-housing activities in their respective regions of the state.</li> </ul> <p>When special/additional funding is made available to the ESG program, the Recipient will allocate those funds through an internal process to expedite award. Factors affecting this distribution may include timing of the award, timeliness of expenditures, performance, need, and HUD or CoC priorities.</p>
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<b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b>	
<b>Describe how resources will be allocated among funding categories.</b>	<p>Shelter activities will be comprised of no more than sixty percent (60%) of the total ESG award. Of the remaining forty percent (40%), homelessness prevention will exceed no more than forty percent (40%), with rapid re-housing funds equaling approximately sixty percent (60%).</p> <p>Additional funding allocations will be allocated based on HUD-identified priorities or CoC-identified targets.</p>
<b>Describe threshold factors and grant size limits.</b>	Subrecipients must document their experience with the proposed population, organizational capacity, and demonstrated fiscal ability to administer federal funding.

<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>Reduce Number of Those Living On Streets or In Shelters or First Time Homeless: Sixty-five percent (65%) of households receiving homelessness prevention will not enter a HUD-funded shelter or rapid re-housing program or access homelessness prevention funding again within twelve (12) months of receiving assistance. Achievement of the applicable goal will be verified using HMIS data or a comparable database. (HP)</p> <p>Shorten Length of Homelessness and Risk of Housing Instability: Fifty percent (50%) of participants living in shelter will exit to permanent housing. Achievement of this goal will be verified using HMIS data or a comparable database. (ES)</p> <p>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)</p> <p>Ten percent (10%) of households will gain or increase employment or other income at the time of project exit. Achievement of this goal will be verified using HMIS data or a comparable database. (RRH)</p> <p>Maintain Data Quality: Programs will maintain 95% data completeness of the Universal Data Elements in HMIS or a comparable database. Achievement of this goal will be verified using HMIS data or a comparable database. (ES, RRH, HP)</p>
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**Discussion:**

No response required.

## AP-35 Projects – (Optional)

### Introduction:

Because of the nature of allocations and funding under the federal program system, Idaho's affordable housing and community development program have not yet determined the individual activities for the allocation at the time this report is written. Specific project activities will be added to the Annual Action Plans/Projects in IDIS when the awards are made.

#	Project Name
5	State of Idaho ESG
6	CDBG-Public Facilities/Infrastructure-Compliance
7	CDBG-Public Facilities/Infrastructure-Rehabilitation
8	CDBG-Public Facilities/Infrastructure-New Construction
9	CDBG-Economic Development-Job Creation
10	CDBG-Economic Development-Downtown Revitalization
11	CDBG State Administration
12	CDBG-Technical Assistance
13	2020 HOME Administration
14	2020 Multifamily Rental - New Construction
15	2020 Single Family- Rental
16	2020 Single Family Homebuyer- New Construction
17	2020 Single Family Homebuyer- Rehabilitation
18	2020 HTF Administration
19	2020 CHDO Predevelopment Loan
20	2020 CHDO Operating Assistance Grant

**Table 32 – Project Information**

### ESG

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. IHFA also provides housing and/or supportive services to households participating in the Housing Opportunities For Persons With HIV/AIDS (HOPWA) program. Homelessness is not a required program admittance requirement. HOPWA participants may receive permanent rental subsidies, along with individualized case management. While the CoC, ESG, and HOPWA programs may serve vulnerable populations (elderly, frail elderly, persons with disabilities, etc.), the only specifically targeted subpopulations are HIV/AIDS and disabled.



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

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

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

HOME/HTF - To address Idaho's underserved affordable housing needs, IHFA will allocate funds to permanent housing activities that address the following strategies: (1) Create and preserve affordable rental housing; (2) Provide 0% interest loans to nonprofit housing developers and homebuyers as gap financing to help create affordable single-family homes; and (3) Provide operating assistance grants to certified non-profit, community-based housing development organizations (CHDOs) to help with day-to-day operations and build organizational capacity to own/develop affordable rental housing and homebuyer properties.

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

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	State of Idaho ESG
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Housing related activities Homeless Shelter Operations & Prevention
	<b>Funding</b>	ESG: \$1,013,565
	<b>Description</b>	Includes shelter, homelessness prevention, rapid re-housing, data collection, and administrative activities. The special needs housing programs administered by IHFA predominately serve homeless persons. In many cases, these HUD 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. IHFA also provides housing and/or supportive services to households participating in the Housing Opportunities For Persons With HIV/AIDS (HOPWA) program. Homelessness is not a required program admittance requirement. HOPWA participants may receive permanent rental subsidies, along with individualized case management. While the COC, ESG, and HOPWA programs may serve vulnerable populations (elderly, frail elderly, persons with disabilities, etc.), the only specifically targeted subpopulations are HIV/AIDS and disabled.
	<b>Target Date</b>	3/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Tenant-based rental assistance / Rapid Rehousing 300 households, Homeless Person Overnight Shelter 1,500 persons, Homelessness Prevention 660 persons.
	<b>Location Description</b>	BoS CoC

	<b>Planned Activities</b>	Shelter, homelessness prevention, and rapid re-housing
<b>2</b>	<b>Project Name</b>	CDBG-Public Facilities/Infrastructure-Compliance
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Facilities/Infrastructure-Compliance
	<b>Needs Addressed</b>	Public Facilities Public Infrastructure Housing related activities Economic Development
	<b>Funding</b>	CDBG: \$1,859,037
	<b>Description</b>	Activities that bring public facility systems (infrastructure, community facilities, public utilities) into compliance with environmental laws, federal and state standards, industry standards, building codes and best management practices.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	State of Idaho estimates 580 persons will benefit from the proposed activities. Based on the state's census data there are 2.67 persons per household. 217 households will benefit from the proposed 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.
<b>3</b>	<b>Project Name</b>	CDBG-Public Facilities/Infrastructure-Rehabilitation
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Facilities/Infrastructure-Rehabilitation
	<b>Needs Addressed</b>	Public Facilities Public Infrastructure Housing related activities
	<b>Funding</b>	CDBG: \$2,230,844
	<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>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	State of Idaho estimates 6864 persons will benefit from the proposed activities. Based on the state's census data there are 2.67 person per household. 2570 households will benefit from the proposed 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>4</b>	<b>Project Name</b>	CDBG-Public Facilities/Infrastructure-New Construction
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Facilities/Infrastructure-New Construction
	<b>Needs Addressed</b>	Public Facilities Public Infrastructure
	<b>Funding</b>	CDBG: \$1,859,037
	<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>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	State of Idaho estimates 29,588 persons will benefit from the proposed activities. Based on the state's census data there are 2.67 persons per household. 11081 households will benefit from the proposed 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>5</b>	<b>Planned Activities</b>	Project administration costs, design services, land acquisition, public facilities/infrastructure new construction, rehabilitation and compliance.
	<b>Project Name</b>	CDBG-Economic Development-Job Creation
	<b>Target Area</b>	

	<b>Goals Supported</b>	Economic Development-Job Creation
	<b>Needs Addressed</b>	Public Facilities Public Infrastructure Economic Development
	<b>Funding</b>	CDBG: \$743,615
	<b>Description</b>	Infrastructure improvements for business expansion and subsequent job creation.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<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.
6	<b>Project Name</b>	CDBG-Economic Development-Downtown Revitalization
	<b>Target Area</b>	
	<b>Goals Supported</b>	Economic Development-Downtown Revitalization
	<b>Needs Addressed</b>	Economic Development Cleanup of blighted properties
	<b>Funding</b>	CDBG: \$743,615
	<b>Description</b>	Public infrastructure improvements to prevent blighted downtown areas.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	State of Idaho estimates one low to moderate income city will benefit from 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>7</b>	<b>Project Name</b>	CDBG State Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	CDBG: \$255,385
	<b>Description</b>	State administration costs associated with projects and activities.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	State administrative costs.
<b>8</b>	<b>Project Name</b>	CDBG-Technical Assistance
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	CDBG: \$77,692
	<b>Description</b>	Fair Housing activities, training and technical assistance.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Fair Housing activities, training events, technical assistance.

9	<b>Project Name</b>	2020 HOME Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	Provide Decent Affordable Housing
	<b>Needs Addressed</b>	
	<b>Funding</b>	HOME: \$1,024,552
	<b>Description</b>	Administration and planning costs.
	<b>Target Date</b>	3/31/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	Administration and Planning costs.
10	<b>Project Name</b>	2020 Multifamily Rental - New Construction
	<b>Target Area</b>	
	<b>Goals Supported</b>	Provide Decent Affordable Housing
	<b>Needs Addressed</b>	Create and Preserve Affordable Rental Housing
	<b>Funding</b>	
	<b>Description</b>	Create and Preserve Affordable Rental Housing
	<b>Target Date</b>	3/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	53 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>	
11	<b>Project Name</b>	2020 Single Family- Rental
	<b>Target Area</b>	
	<b>Goals Supported</b>	Provide Decent Affordable Housing
	<b>Needs Addressed</b>	Create and Preserve Affordable Rental Housing
	<b>Funding</b>	

	<b>Description</b>	Nonprofit owner-developers will construction single-family homebuyer units for sale to low-income or extremely-low households.
	<b>Target Date</b>	3/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Eight (8) Units Low Income Households
	<b>Location Description</b>	Idaho
	<b>Planned Activities</b>	
<b>12</b>	<b>Project Name</b>	2020 Single Family Homebuyer- New Construction
	<b>Target Area</b>	
	<b>Goals Supported</b>	Provide Decent Affordable Housing
	<b>Needs Addressed</b>	Create Decent Affordable Homeownership
	<b>Funding</b>	
	<b>Description</b>	Non-profit owner-developers will acquire land and construct single-family units to be sold to HOME eligible, IHFA qualified homebuyers.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Six (6) Low-income Households
	<b>Location Description</b>	Idaho
	<b>Planned Activities</b>	
<b>13</b>	<b>Project Name</b>	2020 Single Family Homebuyer- Rehabilitation
	<b>Target Area</b>	
	<b>Goals Supported</b>	Provide Decent Affordable Housing
	<b>Needs Addressed</b>	Create Decent Affordable Homeownership
	<b>Funding</b>	
	<b>Description</b>	
	<b>Target Date</b>	3/31/2023



	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Nine (9) Low -Income Households
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>14</b>	<b>Project Name</b>	2020 HTF Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	Provide Decent Affordable Housing
	<b>Needs Addressed</b>	
	<b>Funding</b>	
	<b>Description</b>	Administration of Program
	<b>Target Date</b>	3/31/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	Idaho
	<b>Planned Activities</b>	
<b>15</b>	<b>Project Name</b>	2020 CHDO Predevelopment Loan
	<b>Target Area</b>	
	<b>Goals Supported</b>	Provide Decent Affordable Housing
	<b>Needs Addressed</b>	
	<b>Funding</b>	
	<b>Description</b>	Upfront predevelopment costs for a potential CHDO Set-Aside Project
	<b>Target Date</b>	3/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	

	<b>Planned Activities</b>	One CHDO Predevelopment loan to assist with feasibility and planning activities of a potential activity.
<b>16</b>	<b>Project Name</b>	2020 CHDO Operating Assistance Grant
	<b>Target Area</b>	
	<b>Goals Supported</b>	Provide Decent Affordable Housing
	<b>Needs Addressed</b>	
	<b>Funding</b>	
	<b>Description</b>	Assistance to certified CHDOs to help with the day-to-day operating expenses as they develop affordability housing in the communities they serve.
	<b>Target Date</b>	3/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	Idaho
	<b>Planned Activities</b>	Assist certified and eligible CHDOs with up to \$50,000 during PY 2019 to help pay for day-to-day operating expenses.

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

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

No

**Available Grant Amounts**

N/A

**Acceptance process of applications**

N/A

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

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

Yes

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

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

## AP-50 Geographic Distribution – 91.320(f)

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

CDBG- Funds are allocated on a competitive basis: annually for public facilities, housing, downtown revitalization, and senior and community center projects; quarterly for economic development, job creation projects; and throughout the year for imminent threat projects. The most competitive projects are funded without using any artificial targeting of areas or beneficiaries. Funding per region varies year to year depending on the greatest needs and project sustainability Statewide. Idaho generally spends on average over 75% of the CDBG funds on activities that benefit low-to-moderate income persons.

HOME and HTF-

See Unique Appendices

ESG- For purposes of CPD program fund allocation, program administration, and BoS CoC structuring, Idaho is segmented into seven (7) regions. See SP-10 "Geographic Priorities" for a map of the 7 regions, and the counties that are included in each region. ESG funds are distributed across the seven regions through a competitive application process. Final awards are based on application score for shelter funds and a formula which determines need based on five factors when determining homelessness prevention and rapid re-housing allocations.

### Geographic Distribution

Target Area	Percentage of Funds

Table 33 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

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

cause a lack of funding in certain regions. </font></font></p>

## Discussion

No Response

## Affordable Housing

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

#### Introduction:

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

One Year Goals for the Number of Households to be Supported	
Homeless	1,500
Non-Homeless	66
Special-Needs	0
Total	1,566

**Table 34 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	51
Rehab of Existing Units	15
Acquisition of Existing Units	0
Total	66

**Table 35 - 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 2020. It is noted the totals in each category include both rental and homebuyer units.

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

### **Introduction:**

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

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

- IHFA will continue to administer the Section 8 Housing Choice Voucher Homeownership program, which is currently available only to disabled households and those households currently participating in the Voucher Family Self Sufficiency program.
- IHFA will actively apply for additional voucher funding whenever available. IHFA was awarded additional VASH vouchers in 2018, as well as additional "mainstream" vouchers. However, it is not known at this time if additional funding will be available in PY 2020.
- In an effort to provide more housing opportunities for voucher holders, IHFA may consider issuing project-based vouchers in some areas of Idaho in 2020. These projects may be limited to certain targeted populations such as persons with disabilities, veterans, or persons experiencing homelessness.
- To date, 44 participants have successfully purchased a home using Section 8 Housing Choice Vouchers that provide mortgage payment subsidy on a long-term basis.

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

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

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

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

### **Discussion:**



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

### **Introduction**

IHFA's administration of the CoC, ESG, and HOPWA programs; Idaho's Homeless Management Information System; the BoS CoC; HOME and Low Income Housing Tax Credit allocations; and a large portion of the total Section 8 Housing Choice Vouchers available in the state, places the association in a unique position to pair resources and form partnerships with others to impose a positive impact upon the living situation of homeless persons in Idaho.

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

Please refer to the Unique Appendices.

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

Please refer to the Unique Appendices.

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

Please refer to the Unique Appendices.

**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**

Please refer to the Unique Appendices.

**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**

Please refer to the Unique Appendices.

## **Discussion**

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

### **Introduction:**

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

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

Response exceeds the maximum allowable characters- See Unique Appendices

### **Discussion:**

## **AP-85 Other Actions – 91.320(j)**

### **Introduction:**

Not required.

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

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

**ESG-** IHFA, in collaboration with the BoS CoC and related networks, will place an emphasis on the following efforts: 1) continue to improve the quality and effectiveness of the CoC's Coordinated Entry System, Homeless Connect, using meaningful assessments to help prioritize funding allocations and conduct right-sizing efforts; 2) maintain our status as a Unified Funding Agency (UFA) to increase efficiencies and coordination within the Continuum of Care program; 3) take advantage of technical assistance approved by HUD by participating in the Rural and Balance of State Community of Practice to identify best practices and improve collaboration and partnerships among other CoC's working to ensure homelessness in rare, brief and nonrecurring 4) maintain ESG's current impact on the homeless population in Idaho.

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

Response exceeds maximum allowable characters- See Unique Appendices

### **Actions planned to reduce lead-based paint hazards**

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

- HOME and HTF - Whenever funds are awarded to acquire and/or rehabilitate residential housing constructed on or before January 1, 1978, IHFA will require the seller and buyer to comply with the applicable requirements at 24 CFR Part 35, and as determined by the scope of the activity and the amount of federal assistance on a per-unit basis as defined

at §31.915. These requirements are enforced through written agreement with the owner.

- Because the State of Idaho does not have a Lead-based paint (LBP) hazard reduction program, the Federal EPA Lead-Based Paint Renovation, Repair, and Paint (RRP) Rule apply. In addition, because HOME is a HUD program, the HUD Lead-Safe Housing Rule (LSHR) also applies to acquisition and/or rehabilitation activities involving pre-78 housing. In those cases when one Federal rule is more restrictive than the other, the most restrictive rule will apply.

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

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

### **Actions planned to reduce the number of poverty-level families**

Idaho State Department of Health and Welfare goals and objectives are noted in the 2020-2024 Five-Year Consolidated Plan.

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

### **HOPES Program-**

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

HOME/CDBG/HTF- HUD's Section 3 regulation require development activities to include to provide, to the maximum extent feasible, work and training opportunities that target low-income persons/ business concerns when aggregate federal funding in the project meets the applicable Section 3

threshold amounts. Project owners also conduct outreach to Minority/Women-Owned Business Enterprises. Developers are encouraged to use Idaho's Procurement Technical Assistance Center when professional and construction services are needed. Idaho Procurement Technical Assistance Center (PTAC) reaches Disadvantaged and Women Business enterprises, HUD Zone businesses, disabled veteran-owned businesses, and SBA Section 8(a) business around the state.

### **Actions planned to develop institutional structure**

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

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

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

IHFA and IDC will continue to facilitate and participate in stakeholder forums during PY2015 to enhance collaboration and coordination of public, private and faith based service providers for housing, economic development, and other services:

- The Housing Coordination and Policy Forum ([www.ihfa.org/research\\_hirc\\_forum.asp](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
- IHFA Funding Allocation Committee
- Idaho Commission on Aging
- State of Idaho HIV/STD Planning Committee
- cities and counties
- local planning districts
- USDA-RD

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

The Idaho Balance of State Continuum of Care was awarded a planning grant in the 2019 program funding competitions. The non-renewable planning grant is intended to aid CoC's in expanding current activities and establish governing structures and systems which ensure proper oversight and

coordination of HUD-funded homeless programs. Activities associated with the 2019 award began in October of 2019. . 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 will promote and foster relationships between housing and service providers. ESG and HOPWA providers will be included in the CoC's efforts.

**Discussion:**

During PY2020, IHFA will provide Certifications of Consistency with the Five-Year Consolidated Plan in a fair and impartial manner for those HUD programs that IHFA indicated it would support.

## Program Specific Requirements

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

#### Introduction:

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

HOME & HTF Programs- Single-family and multifamily activities financing and regulatory requirements as well as the award and funding process are found in IHFA's 2020 Annual Administrative Plan at <https://www.idahohousing.com/federal-programs/home-program/>. IHFA reviews and updates its Administrative Plan on an annual basis to ensure these very limited federal affordable housing development programs funds are used in the most effective way possible to create affordable housing and generate program income.

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

##### Reference 24 CFR 91.320(k)(1)

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

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

#### Other CDBG Requirements

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



**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:

HOME's Recapture Provision is triggered whenever a HOME-assisted homebuyer sells their HOME-assisted Single-family unit.

IHFA will attempt to recapture the amount of HOME subsidy provided directly to the homebuyer to purchase the property as identified in the HOME Deed of Trust. Direct subsidy is defined as the amount of direct assistance to the homebuyer and the difference between Estimated Fair Market Value and a reduced sales price when the reduced sales price is directly attributable to qualifying the low-income homebuyer.

At the time of the title transfer IHFA will attempt to recapture the HOME homebuyer direct subsidy as available from the Net Proceeds.

- Net Proceeds is defined as the sales price minus any superior loan and closing costs.
- The HOME-assisted homeowner may sell the HOME-assisted unit at any time to any willing buyer for whatever the market will bear.
- IHFA will not attempt to recapture more than the HOME direct subsidy as defined in the Deed of Trust Note, as available from the Net Proceeds of the sale.
- Any/all excess Net proceeds belong to the HOME-assisted homeowner.

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 completion date as entered in HUD's Integrated Disbursement Information System(IDIS), the HOME-assisted unit is required to meet a HOME period of affordability, a period of time not less than the HOME regulatory minimum nor more than the regulatory maximum as specified at §92.254(a)(4), determined by the amount of direct subsidy provided to the homebuyer. IHFA may add additional years or months to a period of affordability at its discretion within the regulatory requirements, as identified in the HOME 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:

After consideration, IHFA's HOME program has chosen not to refinance existing debt secured by multifamily housing.

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

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

The response to this question exceeds the amount of space available here. The response is located in the **Grantee's Unique Appendices**

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

The Balance of State Continuum of Care has implemented a Coordinated Assessment System which utilizes the Coordinated Assessment of Barriers to Housing form. The evaluation is conducted during applicant screening at all CoC, ESG, and HOPWA projects. The assessment measures extent of homelessness, factors contributing to homelessness, and resources available to the homeless individual or family. The final scoring will place each applicant in one of four categories, including very substantial barriers to housing, substantial barriers to housing, moderate barriers to housing, and low barriers to housing. The individual or family in need of assistance will then be referred to a program which most appropriately matches their apparent needs.

In some areas of the state, housing options may be limited. In circumstances where the most appropriate type of housing or service is not available, the homeless individual or family will be referred to the housing type that most closely resembles the preferred option.

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

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

- Funding availability announced in Idaho newspapers in each region of the state soliciting project applications from interested state or local governments and non-profit organizations.
- In 2019, 24 applications were submitted for review by the Independent Review Panel (IRP). Persons

with experience in issues related to homelessness or very low income households were recruited to serve on the IRP. The reviewers are responsible for rating applications using criteria provided by IHFA.

- Members of the IRP score each proposal individually before meeting to reconcile and average all panelists' scores. The resulting averaged score reflects the Panel's collective determination of merit. All applications meeting a threshold score determined by a weighted average were funded. The following includes a summary of the six vital areas that serve as the basis for funding approval:
  - Agency background, including history of service and population servedEmergency Solutions needs and/or the service deficiency the project addressesIdentify independent elements and/or services requiring fundingGoals and objectives and how they would be achievedOutcome measurements and documentation of accomplishmentsStatement describing applicant's capacity to administer the award from the rating process, seventeen (17) agencies were awarded conditional funding to provide shelter services and operations, and ten (10) agencies were awarded homelessness prevention or rapid re-housing activities in their respective regions of the state. All applicants were evaluated based on their threshold score. For the qualifying applicants, documentation is required regarding the following functional areas in the technical submission:
    - Grant budget
    - Homeless Participation and representation on the Board of Directors
    - Insurance coverage
    - Matching funds
    - Local government certifications
    - Accounting certifications
    - Various assurances
    - Various authorizations
  - Facility description and capacities. Upon making final awards, grant agreements are provided with instructions, policies, and procedures for implementing the Emergency Solutions Grant.
4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

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

5. Describe performance standards for evaluating ESG.

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

- **Reduce Number of Those Living On Streets or In Shelters or First Time Homeless:** Sixty-five percent (65%) of households receiving homelessness prevention will not enter a HUD-funded shelter or rapid re-housing program or access homelessness prevention funding again within twelve (12) months of receiving assistance. Achievement of the applicable goal will be verified using HMIS data or a comparable database. (HP) **Shorten Length of Homelessness and Risk of Housing Instability:** Fifty percent (50%) of participants living in shelter will exit to permanent housing.. Achievement of this goal will be verified using HMIS data or a comparable database. (ES) **Reduce Housing Barriers or Risk of Housing Stability:** Sixty percent (60%) of participants will exit the program receiving at least one mainstream resource. Achievement of this goal will be verified using HMIS data or a comparable database. (ES, RRH) Ten percent (10%) of households will gain or increase employment or other income at the time of project exit. Achievement of this goal will be verified using HMIS data or a comparable database. (RRH) **Maintain Data Quality:** Programs will maintain 95% data completeness of the Universal Data Elements in HMIS or a comparable database. Achievement of this goal will be verified using HMIS data or a comparable database. (ES, RRH, HP)

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

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

- 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”.
  - 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”.
  - 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”.
  - 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”.
  - 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”.
  - 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”.
  - 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”.
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”.
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”.

**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.

**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.

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

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

**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".

**10. HTF Affordable Homeownership Limits.** If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area

provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

☒ The grantee has determined its own affordable homeownership limits using the methodology described in § 93.305(a)(2) and the limits are attached.

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

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

**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."

**Discussion:**

No response

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