

**2024 Annual Action Plan  
For  
Idaho's Federal Community Development and  
Affordable Housing & Development Programs**



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# Executive Summary

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

### 1. Introduction

See unique appendices

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

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

See AP-20 of this plan.

### 3. Evaluation of past performance

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

Response exceeds maximum allowable characters - See Unique Appendices.

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

Summary from citizen participation section of plan.

Unique Appendices- AP-05 Citizen Participation and Consultation Process

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

### 5. Summary of public comments

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

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

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

See attachment titled "Citizen Participation comments"

**7. Summary**

See attachment titled "Citizen Participation comments"

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

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

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

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

Table 1 – Responsible Agencies

### Narrative

Idaho Housing and Finance Association is Lead Agency for HUD-CPD reporting. IHFA is the State of Idaho's designated administrator of HUD-funded housing and housing development programs.

### Consolidated Plan Public Contact Information

CDBG Program - Department of Commerce

HOME - Idaho Housing and Finance Association

HTF - Idaho Housing and Finance Association

ESG - Idaho Housing and Finance Association

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

### **1. Introduction**

N/A

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

IHFA hosts a housing coordination round table events each year. The event provides a regional forum to discuss current housing issues, promote effective partnerships and enhance ongoing coordination between public and assisted housing providers and local/regional/state service agencies. It brings local, regional, and state housing advocates, public and private service providers, developers, city/county/state/federal officials, state agencies, elected officials/representatives, lenders, and program administrators together to discuss housing, homelessness, and services regionally. Attendees were asked to participate in the Statewide Housing Survey and provide comment regarding this year's Consolidated Plan. In addition IHFA used email distribution lists to request input regarding the consolidated planning process from Idaho's Public Housing Authorities, Section 8/USDA-RD/LIHTC/HOME property owners and developers, residential lenders, real estate brokers, homeless service providers, CHDOs, CDBG entitlement cities, CDBG non-entitlement jurisdictions, House Idaho Collaborative (HIC – formerly “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 encourage greater awareness to the statewide issue of homelessness and for the sharing of best practices and successful models throughout Idaho. The HIC has and continues to invite state agencies to participate in homelessness resolution discussions and HIC board planning sessions and activities. This body creates strategic plans designed to meet the challenges in the BoS CoC. Resources targeting and leveraging are also discussed to ensure access priorities mirror HUD's goals for special populations.

The QAP continues to include language that allows a set aside up to 15% of the annual per capita tax credit amount to address special housing need populations.

If this set aside is not utilized by the Association or if qualified applications are not received, the set-aside will be made available to other qualified non-targeted applications. If utilized, the Association will announce specific guidelines that may apply to the application for these funds at least 180 days prior to the application round. 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**

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

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

To support efforts to address the needs of homeless persons and persons at risk of homelessness, subrecipients that receive ESG and CoC funding are required to use a Coordinated Entry system for housing prioritization. Coordinated Entry utilizes Access Points to administer assessments, and it is through this system that individuals and families are prioritized. To address the needs of chronically homeless individuals and families with children, housing prioritization includes length of time homeless and children in the household as prioritization factors. Further refinement includes the prioritizing groups including veterans, survivors of domestic violence, youth, and households with a person age 62+. The CoC has several committees that help guide work and ensure resources are maximized. The Guiding Idaho Committee develops policies and procedures, which are adopted into the House Idaho Collaborative (HIC) Governance Charter. Such work ensures the ESG operates in an effective manner to meet the goals and strategies adopted.

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

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

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

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

Through the Idaho BoS CoC, HIC and the recipient oversee the allocation of ESG funds, and work collaboratively on the development of policies, performance standards, and program evaluation. Subcommittees including Governance; Data Collection, Reporting and Evaluation; and Strategic Planning support this governing structure, as their input ensures that scarce resources devoted to alleviating homelessness are maximized by filling identified gaps in service in communities throughout Idaho. Using benchmarks derived from the System Performance Measures, the Strategic Planning Committee will develop performance standards for ESG-funded projects, helping the BoS determine what small steps can be taken to address homelessness issues throughout the state. This committee has established several areas on which to focus their work, including methods for identifying those most at risk for becoming homeless for the first time and developing outreach and engagement strategies to reach those who are not currently connected to the BoS's system of providers.

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



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

1	<b>Agency/Group/Organization</b>	DEPARTMENT OF COMMERCE
	<b>Agency/Group/Organization Type</b>	Other government - Federal Other government - State Other government - County Other government - Local Regional organization Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development

<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>To better understand Idaho cities and counties non-housing community development needs, the IDC conducted a local government survey. The survey was sent out to 193 cities and 44 counties in June 2019. The survey did have specific questions related to the CDBG program's method of distribution, allocation amounts, and level of need. Of the 237 surveys sent out a total of 123 were received. IDC reviewed the results of the IHFA and Cloudburst housing stakeholder survey that was conducted in January 2019. the survey included questions related to community and economic development. IDC also utilizes an 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 partnerships and business perspectives. Emergency management consultation takes place with all Idaho Counties. Counties in Idaho are tasked with the responsibility to maintain a disaster agency and an emergency plan. The initial consultation was done via a needs survey that Commerce sent out to all forty-four Idaho Counties on June 25, 2019. The survey has specific questions related to natural disaster needs and also provided the opportunity to comment. Further, in the preparation of the annual action plans, Commerce will notify the Counties that the public comment period is open for their feedback. There are over 140 broadband service providers in the state that consist of local governments, COOPs, private entities. The Idaho Broadband Task Force met with, requested comments and input from these providers. Subsequently, the task force developed recommendations, with one of the recommendations leading to the creation of the Idaho Broadband Advisory Board. The Board has recently created and adopted the Idaho Broadband Strategic Plan. As it stands now, Idaho will utilize federal and state funding specifically earmarked for broadband improvements. With the availability of additional broadband funds, the CDBG program has not been consider as an important funding source to meet</p>
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		broadband needs. However, Commerce will continue to make CDBG available to local governments should they have a need for the funding.
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
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	IHFA is in ongoing consultation with its service providers, agencies, local and state governments, CoCs, property owners and developers. Through this ongoing consultation IHFA maintains updated information on issues and concerns regarding affordable housing, homelessness, and services.

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

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

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

Table 3 - Other local / regional / federal planning efforts

**Narrative**

N/A

**AP-12 Participation - 91.115, 91.300(c)**

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

In preparing and adopting the 2024 Annual Action Plan, the IDC and IHFA follows the current Public Participation Plan for Idaho's Federal Community Development and Affordable Housing Programs.

(1) First public comment period- Legal notices were published in Idaho's major newspapers twice, the first time prior to the 30-day comment period, the second prior to the public hearing. The 30-day comment period is February 12th-March 14th, 2024. The legal notice included a statement in Spanish directing the reader to the IHFA/IDC websites where the full legal notice was available in Spanish. The legal notice included the date, time, and webinar link and location of the public hearing, how submit a comment, how to request a reasonable accommodation and alternative formats, and contacts at IHFA and IDC. The public hearing was a both virtual and in person.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Hearing	Non-targeted/broad community	IHFA and Department of Commerce staff were in attendance, no public attendance			
2	Newspaper Ad	Non-targeted/broad community				
3	Email Distribution	Non-targeted/broad community				

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

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

Actual allocation amounts are not yet available. Expected resources and outcomes will be updated based on actual amounts when published,

and divided based on allocation priority percentages as described in the plan.

**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	7,641,562	0	4,865,928	12,507,490	0	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	0	0	0	0	0	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	1,117,066	0	0	1,117,066	1,117,066	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	0	3,000,000	0	Extremely low income rental units
Continuum of Care	public - federal	Admin and Planning Housing Rental Assistance Services Other	3,755,831	0	0	3,755,831	3,755,831	Awarded 2022 Continuum of Care Grants for RRH, PSH, SSO, Data Collection, Admin, CoC Planning, and UFA Costs.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Tax Credits	private	Multifamily rental new construction Multifamily rental rehab	0	0	0	0	0	Low-Income Housing Tax Credits
Tax Exempt Bond Proceeds	private	Acquisition Economic Development Multifamily rental new construction Multifamily rental rehab	378,230,000	0	0	378,230,000	0	The benefit to borrowers and projects that are eligible for tax-exempt bond financing is a lower interest rate as interest earned is exempt from federal and state income taxes.
Other	private	Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services	1,117,066	0	0	1,117,066	1,117,066	ESG Match

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - federal	Admin and Planning Services TBRA Other	0	0	0	0	0	
Other	public - federal	Other	0	0	0	0	0	

Table 5 - Expected Resources – Priority Table

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

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

**ESG** match contributions include external funding from a variety of federal, state, local, and private sources. ESG imposes a 100% match requirement which may be fulfilled by cash donations or in-kind services. These cash and in-kind donations to the ESG program encourage and support numerous activities including homeownership, increasing access to facilities and services, case management, life skills guidance, and counseling, among other support and service efforts.

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

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

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

**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		Public Facilities Public Infrastructure	CDBG: \$1,828,079	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		Public Facilities Public Infrastructure	CDBG: \$2,193,695	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: \$1,829,079	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: \$731,231	Jobs created/retained: 50 Jobs Businesses assisted: 1 Businesses Assisted
5	Economic Development- Downtown Revitalization	2020	2024	Non-Housing Community Development		Cleanup of blighted properties	CDBG: \$731,231	Other: 2 Other
6	Provide Suitable Living Environment	2020	2024	Homeless			ESG: \$1,117,066 Continuum of Care: \$3,755,831 ESG Match: \$1,117,066	Tenant-based rental assistance / Rapid Rehousing: 198 Households Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 1305 Beds Homelessness Prevention: 556 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		

Table 6 – 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 year (2020) the CDBG percentage expended on public facilities/infrastructure-compliance was 6%. This did not meet the 2020-2024 Consolidated Plan’s five year goal of expending at least 25% on the public facilities / infrastructure – compliance, however, this is just one year of the five-year plan, so until more data developed will leave percentage at 25%.</p> <p>Further rationale for 25%, is based on the results of the needs survey. Some of the activities identified with the highest needs were parks and recreation facilities, community centers, fire/EMT stations, water and sewer system, see survey results. These activities could fall within the compliance goal. Although streets and sidewalk were identified as high needs it would be difficult for these activities to meet a required low-to-moderate income national objective and subsequently the compliance goal. Supportive infrastructure activities for affordable housing could fall within this goal. Another reason for the 25% is that the needs survey under planning studies indicated a high need for funding for facilities plan. Based on these results Commerce will look to create a separate facilities planning study set-aside, which could fall within the public facilities/infrastructure compliance goal.</p> <p>Third, projects funding from this allocation priority will help to ensure Idaho Department of Commerce meets its 70% of funding to benefit low-to-moderate income requirement.</p>

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

3	<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 year (2020) the CDBG percentage expended on Public Facilities/Infrastructure-New Construction goal was 34%. This percentage was above to the 2020-2024 Consolidated Plan’s five year goal of expending 25% on the Public Facilities /Infrastructure – New Construction. Therefore, since the number of new construction projects was over 25%, and with no major changes to community needs for programmatic changes, there doesn't appear to be a need to change the goal percentage. Further, the state broadband task force has indicated a need to assist in expanding broadband in rural communities, therefore, Commerce will look to create a separate planning / study grant set-aside which would include broadband feasibility studies. It is likely the activities under the planning / study grant set-aside could fall within the public facilities / infrastructure new construction goal.</p> <p>Third, projects funding from this allocation priority will help to ensure Idaho Department of Commerce meets its 70% of funding to benefit low-to-moderate income requirement.</p>

4	<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, last year (2020) the CDBG percentage expended on job creation was 0%. Obviously this percentage did not meet the 2020-2024 five year goal of expending 10% on the job creation priority. Based on this, Commerce had considered lowering the percentage, however, one of the best tools to benefit a low-to-moderate income population is to provide job opportunities. Even though using CDBG for job creation projects is not always user friendly, Commerce will keep the goal at 10%.</p> <p>Third, projects funding from this allocation priority will help to ensure IDC meets its 70% of funding to benefit low-to-moderate income requirement.</p>

5	<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>Last year the CDBG percentage expended on downtown revitalization was 7% This did not meet the 2020-2024 Consolidated Plan's five year goal of expending 10% on the downtown revitalization priority. Whereas, the goal was almost met, and the need remains high, Commerce will keep the goal at 10%. One of the reasons for not increasing the goal is that downtown projects do not contribute to the requirement of spending 70% of funding to benefit low-to-moderate income.</p> <p>Third, Idaho Department of Commerce's local government needs survey indicated the existing downtown revitalization goal as the 2nd highest need priority.</p>
6	<b>Goal Name</b>	Provide Suitable Living Environment
	<b>Goal Description</b>	
7	<b>Goal Name</b>	Provide Decent Affordable Housing
	<b>Goal Description</b>	The HOME Program will award funds to approved eligible affordable rental housing and homebuyer activities during the 2024 Program Year. IHFA anticipates all activities approved in the program year 2024 should be completed by the end of Program year 2028.

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

### Introduction:

See Unique Appendices

### Funding Allocation Priorities

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

Other HOPWA Competitive Grant	0	0	0	0	0	100	0	<b>100</b>
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**Table 7 – Funding Allocation Priorities**

**Reason for Allocation Priorities**

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

**ESG** - Other than funding from faith-based organizations and Federal programs, Idaho’s homeless housing and service programs receive little financial support. In the absence of essential emergency shelter funding, many individuals and families are unable to receive reprieve from homelessness through temporary assistance or access to rapid re-housing. For this reason, Idaho has directed a substantial portion of ESG funds (45%) towards emergency shelter activities. The remaining 55% is used for homelessness prevention and rapid re-housing activities, generally with an emphasis placed on rapid re-housing. The additional emphasis is imposed due to IHFA’s alignment with HUD objectives, and HUD precedence within the Homelessness Prevention and Rapid Re-Housing Program, which was born out of the American Recovery and Reinvestment Act of 2009, to divert individuals out of homelessness and shorten shelter stays. Further descriptions are included in section AP-20. IHFA coordinates with the Boise CoC and incorporate their priorities and recommendations into allocation decisions for ESG funding.

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

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



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

**Introduction:**

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

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

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

**Distribution Methods**

**Table 8 - Distribution Methods by State Program**

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

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>DP/CC assistance is awarded to low-income homebuyers as a 0% interest, due on sale or default loan to help with the purchase of a Standard Condition affordable home. Standard condition is defined as a unit that meets state and local residential code and the HOME program's property standards at the time of purchase without any rehabilitation or minor repairs.</p> <p>As defined in the written agreement, a HOME-assisted homebuyer must reside in the assisted unit as a primary residence during the HOME period of affordability. If an assisted homebuyer rents or otherwise occupies their HOME-assisted unit during the period of affordability, and refuses to return to the unit as their primary residence, IHFA calls the loan due and payable. IHFA allows two exceptions to the HOME primary residence requirement: Military transfer or deployment, and full-time post-secondary education. The homeowner must request an exception in writing to the HOME Programs Department, which includes a plan to return to the HOME-assisted unit.</p> <p>The HOME period of affordability is determined by the amount of HOME subsidy the homebuyer receives. Following the HOME Program's Recapture Option, the homebuyer is allowed to sell their HOME-assisted unit at any time, to any willing buyer, at whatever price the market will bear. At the time title is transferred, IHFA will attempt to recapture the entire HOME subsidy amount as available from the Net proceeds of the sale. IHFA's Recapture Option follows §92.254 (a)(ii)(A) (4 and 5). IHFA reviews the maximum amount of DPCC available on an annual basis and may increase or decrease the amount, depending on funding availability and market conditions. The maximum amount available and application requirements are published in the Annual Administrative Plan.</p>
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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>The homebuyer(s) must be able to document annual (gross) household income <math>\leq</math>80% AMI as defined by 24 CFR 5.609. Underwriting requirements are identified in the Annual Administrative Plan.</p> <p>The sales price of the assisted unit cannot exceed the HOME program's annual Homeownership Value Limit for the area</p>
<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>N/A</p>
<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>N/A</p>

<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	
<p><b>Describe how resources will be allocated among funding categories.</b></p>	
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>This program is reviewed on an annual basis and is revised as needed in the annual HOME Administrative Plan.</p>

	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	
2	<p><b>State Program Name:</b></p>	HOME Homebuyer Property Activities
	<p><b>Funding Sources:</b></p>	HOME

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

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



	<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 "Describe all of the criteria that will be used to select applications and the relative importance of these criteria" in AP-30, above.</p>
	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	
3	<p><b>State Program Name:</b></p>	<p>Rental Housing Production</p>
	<p><b>Funding Sources:</b></p>	<p>HOME HTF</p>

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>Following a published NOFA, private and non-profit developers can apply for funds for eligible rental housing activities. The application must include certain minimum threshold criteria and other project-specific criteria as identified in the Annual Administrative Plan. Eligible recipients must be registered Business Entities with the State of Idaho and in Good Standing with IHFA (defined as demonstrated experience and capacity to own, develop, manage, and market federally-assisted rental housing, are familiar with the requirements of other Federal housing programs that may be used in conjunction with CPD funds to ensure compliance with applicable requirements and regulations). Demonstrated experience includes evidence of completing previous projects on time and within the approved budget, and no outstanding or material findings of non-compliance during the period of affordability. IHFA awards HOME/HTF funds as a low or no interest loan (HOME) or Due on Sale (HTF only), depending on the type of project, other programs involved in the project, and the type of preference tenant population(s) served. HOME and/or HTF funds are not committed to any activity until it has received the appropriate level of environmental clearance and all sources of financing in the project have been reasonably secured. IHFA's HOME and HTF programs are designed to work with a variety of public and private funding sources and programs to help create and preserve affordable housing. Single-family rental activities must be owned by a non-profit or unit of local government at application and during the period of affordability. HOME and HTF developers partner with the Low-Income Housing Tax Credit program to create affordable multifamily rental housing units. The HOME and HTF programs are designed to work well with a variety of public and private funding sources to help create and preserve affordable housing. IHFA is the Allocating Agency for Idaho's Low-Income Housing Tax Credit Program.</p>
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<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>HOME/HTF applications/proposals must include specific threshold criteria (see threshold criteria below) to receive a full review and scoring. Additional criteria includes type, scope, and description of the activity, per-unit total and assistance level of investment, proposed project replacement reserves, other funding sources, debt service coverage ratio, proposed loan repayment structure, ownership structure, federal cross-cutting requirements, local planning and zoning approval, proposed tenant population(s), match contributions, development timeline, developer capacity, proximity to essential services based on the proposed tenant population, green building energy efficiency design components, site and building unit design and amenities. HOME specific - Loan Repayment/30 Year Maturity/MATCH/ HTF specific - Additional HTF Units/HTF Repayment choice</p>
<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>N/A</p>
<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>N/A</p>

<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>	<p>HOME applications/proposals must include specific threshold criteria (see threshold criteria below) to receive a full review and scoring. Additionally, IHFA awards HOME and HTF funds to eligible owner/developers following a published NOFA/RFP application/proposal review process. The multifamily rental projects are funded once each year, which coincides with IHFA's Low-income Housing Tax Credit program. Single-family rental housing proposals are accepted following a published RFP, usually after multifamily rental project funding is known. 90% of Idaho's HTF funds will be used for rental housing production and preservation. The funds will target extremely low-income (30% AMI) households.</p>
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>Threshold factors for rental housing activities are identified in the Annual HOME, HTF and NSP Administrative Plan. This plan is reviewed and revised each year as determined by IHFA. The HOME maximum subsidy limit is the 221(d)(3) limits.</p> <p>See Unique Appendices</p>

	<b>What are the outcome measures expected as a result of the method of distribution?</b>	HOME and HTF-assisted rental units serving Low, Very low, and Extremely low-income families and individuals. Projects with a tenant preference for elderly, disabled or 30% AMI received additional points during the application scoring process. The points are reviewed annually and included in the Annual Administrative Plan.
4	<b>State Program Name:</b>	State of Idaho
	<b>Funding Sources:</b>	CDBG ESG
	<b>Describe the state program addressed by the Method of Distribution.</b>	See Unique Appendices.
	<b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>	See Unique Appendices.

<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>See 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>See Unique Appendices.</p>
<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	

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

**Discussion:**

No response required



## AP-35 Projects – (Optional)

### Introduction:

State of Idaho's 2024 CDBG, HOME, HTF, and ESG projects.

#	Project Name
1	CDBG-Public Facilities/Infrastructure-Compliance
2	CDBG-Public Facilities/Infrastructure-Rehabilitation
3	CDBG-Public Facilities/Infrastructure-New Construction
4	CDBG-Economic Development-Job Creation
5	CDBG-Economic Development-Downtown Revitalization
6	CDBG State Administration
7	CDBG-Technical Assistance
8	State of Idaho ESG
9	2024 HOME Administration
10	2024 Multifamily Rental -New Construction
11	2024 Single Family - Homebuyer - New Construction
12	2024 Single Family - Homebuyer - Rehabilitation
13	2024 Single Family - Homebuyer - DPCC
14	2024 CHDO Operating Assistance Grant
15	2024 HTF Administration

Table 9 – Project Information

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

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

commute or are home bound.

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

## AP-38 Project Summary

### Project Summary Information

1	<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
	<b>Funding</b>	CDBG: \$1,828,079
	<b>Description</b>	Activities that bring facility systems (infrastructure, community facilities, public utilities) into compliance with environmental laws, federal and state standards, building codes and best management practices.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	State of Idaho estimates 12000 persons will benefit from the proposed activities in other than housing benefit activities and 12 households in housing benefit activities.
	<b>Location Description</b>	Cities and counties throughout Idaho with the exception of nine entitlement: Coeur D Alene, Lewiston, Caldwell, Nampa, Meridian, Boise, Pocatello, Idaho Falls and Twin Falls.
<b>Planned Activities</b>	Project administration costs, design services, land acquisition, public facilities/infrastructure new construction, rehabilitation and compliance.	
2	<b>Project Name</b>	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: \$2,193,695

	<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 17000 persons will benefit from the proposed activities in other than housing benefit activities and 24 households in housing benefit activities.
	<b>Location Description</b>	Cities and counties throughout Idaho with the exception of nine entitlement cities: Coeur D Alene, Lewiston, Caldwell, Nampa, Meridian, Boise, Pocatello, Idaho Falls and Twin Falls.
	<b>Planned Activities</b>	Activities that include the rehabilitation, replacement, and/or remodeling of public facilities (infrastructure, community facilities, public utilities and affordable housing) systems.
<b>3</b>	<b>Project Name</b>	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: \$1,828,079
	<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 12000 persons will benefit from the proposed activities in other than housing benefit activities and 12 households in housing benefit activities.
	<b>Location Description</b>	Cities and counties throughout Idaho with the exception of nine entitlement cities: Coeur D Alene, Lewiston, Caldwell, Nampa, Meridian, Boise, Pocatello, Idaho Falls and Twin Falls.
	<b>Planned Activities</b>	Project administration costs, design services, land acquisition, public facilities/infrastructure new construction, rehabilitation and compliance.

4	<b>Project Name</b>	CDBG-Economic Development-Job Creation
	<b>Target Area</b>	
	<b>Goals Supported</b>	Economic Development-Job Creation
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG: \$731,231
	<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>	Number of businesses assisted is one and the number of jobs created will be 50.
	<b>Location Description</b>	Cities and counties throughout Idaho with the exception of nine entitlement cities: Coeur D Alene, Lewiston, Caldwell, Nampa, Meridian, Boise, Pocatello, Idaho Falls and Twin Falls.
<b>Planned Activities</b>	Project administration costs, design services, land acquisition, public facilities/infrastructure new construction, rehabilitation and compliance.	
5	<b>Project Name</b>	CDBG-Economic Development-Downtown Revitalization
	<b>Target Area</b>	
	<b>Goals Supported</b>	Economic Development-Downtown Revitalization
	<b>Needs Addressed</b>	Cleanup of blighted properties
	<b>Funding</b>	CDBG: \$731,231
	<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 two low to moderate income cities will benefit from a downtown revitalization project.
	<b>Location Description</b>	Cities and counties throughout Idaho with the exception of nine entitlement cities: Coeur D Alene, Lewiston, Caldwell, Nampa, Meridian, Boise, Pocatello, Idaho Falls and Twin Falls.

	<b>Planned Activities</b>	Project administration costs, design services, land acquisition, public facilities/infrastructure new construction, rehabilitation and compliance
<b>6</b>	<b>Project Name</b>	CDBG State Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	CDBG: \$258,894
	<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>7</b>	<b>Project Name</b>	CDBG-Technical Assistance
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	CDBG: \$79,446
	<b>Description</b>	Fair housing State Administration costs associated with projects and 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>	
<b>8</b>	<b>Project Name</b>	State of Idaho ESG
	<b>Target Area</b>	

	<b>Goals Supported</b>	Provide Suitable Living Environment
	<b>Needs Addressed</b>	Homeless Shelter Operations & Prevention
	<b>Funding</b>	ESG: \$1,117,066
	<b>Description</b>	Includes shelter, homelessness prevention, rapid rehousing, data collection and administrative activities. The Special Needs Housing Programs administered by IHFA predominately serve homeless persons. In many cases, these HUD funds can be used for homelessness prevention and rapid rehousing activities.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Through ESG we expect to help at least 198 households with rapid rehousing, at least 556 households with homelessness prevention, and to support at least 1305 individuals with shelter services. Our shelters include family shelters, domestic violence shelters, and one youth shelter.
	<b>Location Description</b>	IHFA provides ESG funds throughout the state of Idaho, including the cities of Boise, Pocatello, Moscow, Nampa, Coeur d'Alene, Salmon, Malad, Lewiston, Twin Falls, and Idaho Falls.
	<b>Planned Activities</b>	With ESG funding IHFA will provide funding for shelter services and operations, homelessness prevention, rapid rehousing, data collection, and administration.
9	<b>Project Name</b>	2024 HOME Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	:
	<b>Description</b>	Administration and Planning costs - 10% of HOME Grant and 10% of 2023 Program Income
	<b>Target Date</b>	3/31/2029
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Administration and Planning costs

10	<b>Project Name</b>	2024 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>	Provide Decent Affordable Housing
	<b>Target Date</b>	3/31/2029
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	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>	2024 Single Family - Homebuyer - New Construction
	<b>Target Area</b>	
	<b>Goals Supported</b>	Provide Decent Affordable Housing
	<b>Needs Addressed</b>	
	<b>Funding</b>	:
	<b>Description</b>	Non-profit owner-developers will acquire land, construct single-family units to be sold to HOME eligible, IHFA qualified homebuyers.
	<b>Target Date</b>	3/31/2029
	<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>	
12	<b>Project Name</b>	2024 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>	
	<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>13</b>	<b>Project Name</b>	2024 Single Family - Homebuyer - DPCC
	<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>	3/31/2029
	<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>14</b>	<b>Project Name</b>	2024 CHDO Operating Assistance Grant
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<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 affordable housing in the communities they serve.
	<b>Target Date</b>	

	<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 2024 to help pay for day-to-day operating expenses.
<b>15</b>	<b>Project Name</b>	2024 HTF Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	:
	<b>Description</b>	Administration of Program
	<b>Target Date</b>	3/31/2029
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	

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

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

No

**Available Grant Amounts**

N/A

**Acceptance process of applications**

N/A

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

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

No

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

N/A

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

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

**HOME and HTF** - See Unique Appendices

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

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

Region 1: 13%

Region 2: 15%

Region 3: 14%

Region 4: 15%

Region 5: 14%

Region 6: 14%

Region 7: 11%

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

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

### Geographic Distribution

Target Area	Percentage of Funds

Table 10 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

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

- Percentage of Idaho population
- Median rent-to-income ratio
- Percentage of population at or below poverty level

- Number of individuals experiencing homelessness

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

Region 1: 16%

Region 2: 10%

Region 3: 18%

Region 4: 3%

Region 5: 15%

Region 6: 3%

Region 7: 20%

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

### **Discussion**

No response

## Affordable Housing

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

**Introduction:**

The numbers below will reflect the one year goals for the provision of affordable housing to benefit low, very low, and extremely low-income families and individuals through the State of Idaho's HOME and HTF Programs. Goals will be based on final allocation amounts (that have not yet been released) and the annual per unit subsidy limits that are available at <https://www.idahohousing.com/federal-programs/home-program/>. IHFA expects to HOME to apply 87% of the awarded allocation and 90% of receipted 2023 Program income, and 90% of the HTF allocation on housing projects. That amount will then be used based on allocation priorities. The goals in this table will be updated when the final allocation amounts become available.

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

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

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

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

**Discussion:**

The tables above indicate the number of estimated HOME and Housing Trust Funds rental and homebuyer units to be preserved or created during Program Year 2024. 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 Association (IHFA) administers the Section 8 Housing Choice Voucher program in 34 of 44 Idaho counties and encourages housing programs statewide, as IHFA is only one in a statewide network of housing providers. IHFA does not oversee any citywide or countywide Participating Jurisdictions (PJs) for public housing. These jurisdictions have local official governing boards responsible to appoint the board of a Public Housing Authority (PHA) and direct PHA activities.

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

- IHFA will actively apply for additional voucher funding when available and appropriate for its program.
- In an effort to provide more housing opportunities for voucher holders, IHFA will continue to assess opportunities to develop additional PBV projects in 2024. These projects may be limited to certain targeted populations such as persons with disabilities, veterans, or persons experiencing homelessness.
- IHFA will continue to administer the Section 8 Housing Choice Voucher Homeownership program, which is currently available only to disabled households and elderly households. This will expand to qualified households in the FSS program, as well, when HOTMA regulations go into effect. To date, 44 participants have successfully purchased a home using IHFA's Section 8 Housing Choice Voucher Homeownership program, which can provide mortgage payment subsidy on a long-term basis.

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

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

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

IHFA's rental assistance program is not designated as troubled, and currently maintains a designation as a High Performer per HUD definitions and recent SEMAP scores.

### **Discussion:**



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

### **Introduction**

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

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

To execute outreach efforts across the BoS's broad geographic area, which spans 82,582 square miles, the recipient leverages partnerships with nonprofit organizations throughout Idaho. In the upcoming year, the recipient will continue to support these agencies in their efforts to ensure persons experiencing unsheltered homelessness are identified and assessed. Many agencies utilize staff, advocates, and volunteers to provide outreach efforts. Agencies also leverage partnerships with organizations including school districts, law enforcement agencies, healthcare providers, parks and recreational departments, libraries, food pantries, emergency shelters, and others to facilitate outreach efforts.

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

The recipient will continue to administer the Coordinated Entry system, which ensures homeless persons are directed towards the resources that have the highest likelihood of reducing their extent of homelessness, or diverted from homelessness altogether. Using a consistent and well-coordinated approach, the process relies on streamlining access to housing assistance, screening applicants for eligibility, and assessing their needs to determine which interventions are most appropriate. This has proved to be an invaluable tool in assessing the vulnerability, needs, and extent of barriers of those experiencing homelessness. To reach people least likely to seek homelessness assistance, the recipient works in collaboration with the Idaho Department of Health and Welfare's 211 Care Line, Health and Welfare Navigators, Regional Coalition members, and PATH peer specialists to ensure people throughout the CoC's geographic area are aware of, and have access to, the Coordinated Entry system.

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

41% of annual ESG funding is allocated to emergency shelters. Of the 17 emergency shelters receiving funding in Idaho, 5 focus on domestic violence survivors, 2 focus on runaway/homeless youth, and 1 focuses on veterans. Representatives from the agencies managing these shelters, as well as representatives from transitional housing agencies, participate in Regional Coalition meetings. Coalitions provide a forum for the recipient, subrecipients, and other community stakeholders to collectively

address needs of homeless persons. Regional Coalition meetings will continue on a monthly or quarterly basis.

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

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

The Idaho BoS CoC provides grants to 11 permanent supportive housing (PSH) programs throughout the state. In addition, the CoC and ESG programs fund 16 rapid rehousing (RRH) programs. Most of these programs employ a housing specialist, who works with landlords to facilitate access to affordable housing within the community.

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

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

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

1. The recipient will, over the next year, leverage the work IHFA does in administering the HUD Housing

Choice Voucher (HCV) rental assistance program in 34 of the 44 counties in Idaho. The program helps low-income families, the elderly, and disabled individuals obtain decent, safe, and affordable rental housing. IHFA was awarded Mainstream Vouchers which target non-elderly disabled individuals who are either chronically homeless or are exiting institutions. Mainstream vouchers have been allocated throughout the CoC's six regions, with clients identified and prioritized in collaboration with the CoC's Coordinated Entry system. This ensures all housing options are made available to clients within this population and facilitates the goal of filling all the mainstream voucher slots to house as many clients as possible within this population.

2. The recipient will continue, over the coming year, to strengthen relationships with school systems and the foster care system in Idaho to prevent homelessness among youth aging out of foster care. The recipient is pursuing Youth Homeless System Improvement (YHSI) funds in order to build capacity to increase partnerships with these entities and other stakeholders in youth homelessness prevention and response.

3. The recipient will continue, over the coming year, to include key stakeholders at the table to provide input regarding these vulnerable populations. For example, there are representatives from the Idaho Department of Education and the Department of Corrections on the HIC Board and there are many representatives from key stakeholders serving these populations participating in Regional Coalitions to provide input and direction to the BoS CoC.

4. Over the next year, the recipient will ensure that all agencies receiving ESG funds in Idaho offer services that educate and counsel individuals and families to develop skills that promote self-sufficiency, including connecting to SOAR resources when appropriate.

5. Approximately 59% of the ESG funding not associated with shelter activities is used to fund Homelessness Prevention or RRH efforts. This funding allocation will remain fairly consistent over the coming year. These funds are leveraged with services to assist families or individuals in evaluating their primary cause(s) of becoming or being at risk of homelessness.

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

Putting these goals and strategies into action will increase the probability that those needing assistance will improve their housing stability and reduce their risk of experiencing future episodes of homelessness. IHFA supplements the homelessness prevention dollars provided through the ESG program with private funds raised through the Home Partnership Foundation, an independent 501(c)(3) organization that helps communities meet their most pressing needs, providing another resource to help prevent individuals and families from entering the homelessness services system.

## **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:**

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

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

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

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

**HOME and 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).

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

**ESG** - The Idaho BoS CoC has utilized a non-renewable planning grant to help expand current activities and establish governing structures and systems, which ensure proper oversight and coordination of HUD-funded homeless programs. The activities identified by the BoS CoC are coordination activities, project evaluation, participation in the consolidated plan, CoC application activities, and developing a CoC system. Several of these activities include efforts that enhance coordination between public and private housing and service agencies. The CoC has made itself more visible in regional planning and

advocacy bodies to ensure all agencies and individuals connected to homelessness issues are familiar with resources available. This promotes and fosters relationships between housing and service providers. ESG providers are also included in the CoC's efforts.

### **HOME and HTF-**

1) IHFA will conduct rental housing compliance monitoring and on-site inspections as required at §92.504 and §93.404. This will include tenant files and other documentation to help determine the property remains in compliance with specific program rent limits, income limits, and lease requirements. Rental projects will also be monitored for compliance with applicable federal, state, and local laws and regulations, i.e. lead-based paint disclosures, affirmative marketing plans, language access plans, fair housing, and Section 504, and LEP. IHFA will conduct annual financial risk assessment on HOME and HTF-assisted multifamily rental properties with 10 or more HOME and/or HTF assisted units, and additional financial oversight as required by HUD. IHFA will take appropriate action(s) when necessary to bring an assisted project back into compliance as described in the project's written agreement with the owner.

2) Fifteen percent of the annual per capita tax credit will be set-aside for the rehabilitation of existing federally assisted rent-restricted developments and/or for the new construction of developments financed or guaranteed by USDA Rural Development. For rehabilitation developments the scope of the rehabilitation must meet the per unit hard cost requirements identified in Section 4.17 of the LIHTC QAP. The set-aside will be available on a statewide basis during the August Application Round, if sufficient applications are received. Otherwise, it will be available for all other qualified non-targeted applications.

3) HTF project applications will receive additional scoring points if the proposed project currently has project-based rental assistance or other mechanisms in place to help ensure long-term affordability.

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

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

- HOME and HTF - Whenever funds are awarded to acquire and/or rehabilitate residential housing constructed on or before January 1, 1978, IHFA will require the seller and buyer to comply with the applicable requirements at 24 CFR Part 35, and as determined by the scope of the activity and the amount of federal assistance on a per-unit basis as defined at §31.915. These requirements are enforced

through written agreement with the owner.

- Because the State of Idaho does not have a Lead-based paint (LBP) hazard reduction program, the Federal EPA Lead-Based Paint Renovation, Repair, and Paint (RRP) Rule apply. In addition, because HOME is a HUD program, the HUD Lead-Safe Housing Rule (LSHR) also applies to acquisition and/or rehabilitation activities involving pre-78 housing. In those cases when one Federal rule is more restrictive than the other, the most restrictive rule will apply. When program requirements differ, IHFA will follow the most restrictive.
- Owners are required to follow the EPA RRP Rule and the HUD Lead Safe Housing Rule. Lead-based Paint procedures are identified in the annual Administrative Plan and enforced through written agreement with the owner. LBP tenant disclosures, hazard identification and reduction requirements are monitored during the HOME period-of-affordability.

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

**IHFA-** Households who participate in the Federal Section 8 Housing Choice Voucher program are eligible to be part of Idaho Housing's Family Self-Sufficiency (FSS) Program, a voluntary program that helps families become economically independent during the 5-year contract of participation. FSS assists participating families in setting individualized training and service goals, serves to provide case management services that link them to community resources, and aims to help them overcome barriers to gainful employment. FSS participants also have the opportunity to accrue money in an interest-bearing escrow savings account as their earned income grows and their rent portion responsibility increases, leading them toward self-sufficiency. When they have completed their self-sufficiency goals, and are free of cash welfare assistance, 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 up to \$2,000 at a two-to-one match, which upon successful completion of the program, provides up to \$6,000 for down payment and closing cost assistance through the Home Partnership Foundation.

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

businesses, and SBA Section 8(a) business around the state.

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

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

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

1. A lack of services targeting individuals with HIV/AIDS - IHFA's HOPWA program is being dissolved and will be concluded in May of 2024. Although a thorough search was done to find a replacement recipient of HOPWA funds who would have the administrative capabilities of running the program, none was found. Of the sponsor projects left in the program, each has begun the process of formulating transition plans for participants served in the program. Each sponsor has been transitioning participants off the funding sources, and IHFA, who administers TBRA under the program (which accounts for the greatest amount of funding), has transferred those receiving rental assistance to other qualifying programs.
2. A lack of services which promote education and career growth among individuals experiencing homelessness - The recipient partners with subrecipients throughout Idaho who are responsible for providing localized services to children experiencing homelessness or at risk of homelessness. Through outreach efforts, agencies collaborate with education providers to ensure local needs are being met. Agencies work with school districts, colleges, Head Start, Early Start, and parenting education programs. The CoC Board also includes representation from the Department of Education. Subrecipients create housing stability plans and case managers work with families to assess employment goals, employment history, current income level, strengths supporting income goals, barriers to income goals, training and education needs, and other factors to develop an action plan. Families are assisted in completing budgets (current and projected) to assist in scoping employment goals and identifying community resources that would assist overall financial stability. Subrecipients also support individuals' career growth. Case managers identify potential employment training and support organizations. Case managers work with clients to contact employment support organizations and gather information to link services with need accurately. The agencies work with a wide range of employment organizations to decrease barriers to employment and assist clients in skill development or to obtain certifications. Common partner agencies include the Idaho Department of Labor, vocational rehabilitation services, GED programs, local colleges and universities, and other skills development programs.
3. A lack of available rental units available to individuals and families experiencing homelessness - To address the lack of available rental units, the recipient is devoting additional resources to ESG homelessness prevention programs. IHFA is also administered a housing preservation program, which has ended. These programs help individuals and families remain in their current home and avoid the need to find a new rental unit in this competitive market. The recipient is encouraging subrecipients to fund positions for housing specialists, who can focus on building relationships with landlords and also support housing mediation.

**HOME/HTF** will continue to provide technical assistance as needed to help HOME project developers



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**

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

- The Housing Coordination and Policy Forum ([www.ihfa.org/research\\_hirc\\_forum.asp](http://www.ihfa.org/research_hirc_forum.asp))
  - Rural Forums
  - The Idaho Community Review ([www.idahocities.org](http://www.idahocities.org))
  - Idaho Homelessness Coordinating Council
  - Idaho's ADA Task Force
  - Coalition for Idahoans with Disabilities
  - Idaho Hispanic Profile Project
  - Idaho Commission on Aging
  - State of Idaho HIV/STD Planning Committee
  - Regional Housing Coalitions
  - cities and counties
  - local planning districts
- USDA-RD Both IHFA and IDC are participating members of the Fair Housing forum, which works with members of various agencies throughout the State of Idaho to address fair housing concerns.

The Idaho BoS CoC has again been awarded a HUD planning grant. The planning grant is intended to aid CoCs in expanding current activities and establish governing structures and systems which ensure proper oversight and coordination of HUD-funded homeless programs. The activities identified by the BoS CoC are coordination activities, project evaluation, participation in the consolidated plan, CoC application activities, and developing a CoC system. Several of these activities will include efforts that will enhance coordination between public and private housing and service agencies. The CoC will make itself more visible in regional planning and advocacy bodies to ensure all agencies and individuals connected to homelessness issues is familiar with resources available. This enhances coordination in the implementation of the jurisdiction's consolidated plan among stakeholders.

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

### **Discussion:**

# Program Specific Requirements

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

### Introduction:

CDBG program will spend 70% LMI activities for a two-year period. This two-year period would be 2023 and 2024.

**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 2024 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%

Annual Action Plan 74  
2024

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

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

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

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

See Unique Appendices AP-30

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

Beginning on the IDIS Completion date (the date entered in HUD's Integrated Disbursement Information System (IDIS)), a HOME/HTF-assisted activity is required to remain affordable for a specified period of affordability (POA) as determined by HUD, based the amount of HOME/HTF funds invested on a per unit basis. IHFA does not exceed the regulatory minimum POA [§92.254(a)(4) & §93.302 (d)(1)]. During the POA, IHFA monitors the homebuyer annually to verify they continue to reside in the unit as a primary residence. IHFA allows two primary residence exceptions: Active military transfer or deployment or full-time post-secondary education at an institution 50+ miles from the assisted unit. Requirements are fully defined in the current Annual Administrative Plan.

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

See Unique Appendices

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

N/A

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

N/A

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

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

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

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

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

The Idaho BoS CoC has developed the attached Written Standards which provide guidance for CoC, ESG funded programs. These Written Standards have been established to ensure that persons experiencing homelessness, or who are at risk of homelessness, will be given consistent support and services. The majority of the standards within the Written Standards are based on the COC, ESG, and/or the HEARTH Interim Rules. The Written Standards are not intended to be used in lieu of the interim regulations for the HEARTH Act; rather, they are intended to establish and clarify local decisions regarding program administration.

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

Coordinated Entry Access Points in each of the six CoC regions assist clients with their housing and homelessness prevention needs through a consistent and uniform assessment and referral process. Housing prioritization is based on a variety of factors, including:

- Length of Time Homeless
- Whether a client is fleeing DV;

- Age: Have young children in the home OR pregnant; OR have a teen in the home.
- Accessing Emergency Services in the last six months
- How many times arrested, incarcerated or had run-ins with the police in the last six months
- And the World Health Organization’s “Quality of Life” survey.

Clients in need of housing are placed on a centralized, regional queue to ensure those who are most vulnerable receive assistance first. The CoC works in collaboration with the statewide 211 system, service providers, and other community stakeholders to facilitate client access to the Coordinated Entry system. Client data and system reporting is administered through HMIS.

The CE process includes multiple assessment tools to evaluate and identify client needs. The process for all clients begins with a Crisis Needs Assessment to determine a client's housing status and determine the appropriate path through the system. This step also includes diversion tactics to assist households in remaining housed without the use of homelessness assistance resources. The next step is the Housing Assistance Assessment. Clients who are at risk of homelessness leave the Housing Assistance Assessment and continue through the process with a Homelessness Prevention Assessment.

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).

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

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

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 the recipient, adhering to the requirement to place a homeless or formerly homeless individual on the recipient’s Board is not feasible. However, the recipient supports the HIC structure, which reserves a seat on the Board for an individual who is currently experiencing homelessness or has experienced homelessness in the past. Additionally, all ESG and CoC subrecipients are required to include an individual with this experience on their Board, or in another policy-making capacity.

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 House Idaho Collaborative (HIC) is 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".

N/A

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

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

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

#### MINIMUM APPLICATION THRESHOLD CRITERIA

- CPA audited financial statements for prior year-end is not required if the entity is newly formed. The HOME Department will use the financial statement to help determine if the recipient has adequate financial management systems and practices in place, and sufficient financial resources to carry out the project to completion, including positive net income for the most recent year end.
- Capital Needs Assessment for all acquisition and/or rehabilitation activities
- Exhibit S- Site Selection and Environmental Checklist. Previously, submission of this form was recommended, but is now required as part of the application.
- Language Access Plan for Limited English Proficient (LEP) Persons. See chapter 6 for LEP requirements.
- Section 3 and MBE/WBE Developer Plan
- Independent third Party Capital Needs Assessment- Required for all projects
- Operating Costs – Minimum operating costs per unit per year benchmarks
- Market Study. see Exhibit M for requirements
- Affirmatively Furthering Fair Housing (AFFH) Resolution adopted by the proposed project’s unit of local government (City or County) depending on the location of the project) Resolution should be no more than 5 years old. Refer to Chapter 6 and Exhibit F for requirements that should be included in resolution. If the unit of local government has not adopted an AFFH Resolution, the application does not meet minimum threshold and will not be scored.
- Fair Housing Requirements: If the proposed activity will be located in a CDBG Non-Entitlement area, then submit the local jurisdiction's most recent Fair Housing Assessment Plan reviewed by the State of Idaho's CDBG Program (Idaho Department of Commerce); or If the proposed activity will be located in a CDBG Entitlement Area (Boise, Nampa, Meridian, Lewiston, Coeur d'Alene, Idaho Falls, Caldwell, and Pocatello, and Twin Falls), submit that city's most recent

Analysis of Impediments To Affirmatively Further Fair Housing.

- Evidence the recipient has the experience and capacity to begin construction within 12 months and complete the project within a reasonable time period. A narrative should be included in the application detailing the experience and not just a list of past projects and resumé.
- Evidence of site control that complies with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and Environmental Review Procedure 24 CFR §58.22
- Must meet one of four Green Building Design Standards or certifications: Energy Star, LEED, Enterprise Green Communities, and/or IHFA Green Building Standards. Once the standard is selected the proposed project may not change the standard.
- Request for Release of Information. To all/any outside agencies the recipient has an active project(s)
- Pro forma- All operating costs and revenues must be in sufficient detail to compare line items against properties that are similar in physical type and size, so that the HOME Department may determine whether the planned expenditures are sufficient and reasonable.
- Minimum Match Requirement of 10% requested loan amount-HOME Only
- Subsidy Layering sheet
- Funding Commitments: To receive the points, the application must include a written commitment from **all** proposed funding sources (excluding HOME, HTF, and LIHTC). An application that does not include evidence of commitments will not be underwritten and be deemed incomplete.
- Project Narrative Description

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

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



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

Geographic Diversity 3Pts if Project is located in an Opportunity Incentive Area

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

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

Minimum Threshold requirement described in 3b above.

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

Project Based Rental Assistance 3 pts

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

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

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

applicants proforma.

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

Project will provide a housing preference (minimum 3 units) for 2 of the 3 Priority Housing Needs categories below, as identified in the Consolidated Plan. 3 pts. • ≤30% AMI (families or individuals) • Elderly (at least one member of the household is age 62+ • Disabled. 2 pts per identified preference.

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

To be considered, the application must document all sources of funding committed at the time the application is submitted. For scoring purposes, "commitment" is defined as a letter from the issuing entity and outlines the source of funding and the purpose of the funding (permanent loan, construction loan, interim financing, etc.). Minimum Threshold requirement described in 3b above.

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

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.

Idaho's HOME Maximum Per-unit Subsidy Limits are 240% of the base limit for the Section 234 Mortgage Insurance Program. Idaho is defined as a high cost percentage exception area under 212(e)(1) of NAHA by HUD's Office of Multifamily Housing. In determining the most appropriate maximum per-unit subsidy limits for the HTF program, IHFA reviewed the amount of HOME funds invested on a per-unit basis throughout Idaho over three program years (2013-2015). HOME-assisted units were located throughout Idaho, including high cost and resort areas. In most instances, the HOME per-unit maximum subsidy limits were more than sufficient to meet the financing needs of the project. Accordingly, IHFA has determined the HOME Per-Unit Maximum Subsidy limits are an appropriate per-unit subsidy limit for the Housing Trust Fund Program.

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

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

The HTF Rehabilitation Standards are available online in the 2024 Annual Administrative Plan Exhibit C-2 at <https://www.idahohousing.com/federal-programs/home-program/>

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

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

**10. HTF Affordable Homeownership Limits.** If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 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”.

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

Tenant Selection Criteria & Preference Populations (1) Limit the housing to income eligible families;(2) Are reasonably related to the applicants’ ability to perform the obligations of the lease (i.e., to pay the rent, not to damage the housing; not to interfere with the rights and quiet enjoyment of other tenants); (3) Limit eligibility or give a preference to a particular segment of the population if permitted in its written agreement with the grantee (and only if the limitation or preference is described in the grantee’s consolidated plan). (i) Any limitation or preference must not violate nondiscrimination requirements in § 93.350. A limitation or preference does not violate nondiscrimination requirements if the housing also receives funding from a Federal program that limits eligibility to a particular segment of the population (e.g., the Housing Opportunity for Persons With AIDS program under 24 CFR part 574),

and the limit or preference is tailored to serve that segment of the population.(ii) If a project does not receive funding from a Federal program that limits eligibility to a particular segment of the population, the project may have a limitation or preference for persons with disabilities who need services offered at a project only if: (A) The limitation or preference is limited to the population of families (including individuals) with disabilities that significantly interfere with their ability to obtain and maintain housing; (B) Such families will not be able to obtain or maintain themselves in housing without appropriate

supportive services; and (C) Such services cannot be provided in a non segregated setting. The families must not be required to accept the services offered at the project. In advertising the project, the owner may advertise the project as offering services for a particular type of disability; however, the project must be open to all otherwise eligible persons with disabilities who may benefit from the services provided in the project. (4) Do not exclude an applicant with a voucher under the Section 8 Tenant-Based Assistance: Housing Choice Voucher program (24 CFR part 982) or an applicant participating in a HOME tenant-based rental assistance program (24 CFR part 92) because of the status of the prospective tenant as a holder of such voucher or comparable HOME tenant-based assistance document. (5) Provide for the selection of tenants from a written waiting list in the chronological order of their application, in so far as is practicable; and (6) Give prompt written notification to any rejected applicant of the grounds for any rejection. Idaho's current Five-Year (2020-2024) Consolidated Plan has identified three (3) Priority Housing Needs (PHN) Populations: Elderly, Disabled, and  $\leq 30\%$  AMI households. Permanent rental housing owners may choose to provide a tenant preference for any one or more of these PHN populations. If approved by IHFA, the priority Housing needs Population(s) will be identified as a tenant preference(s) in the HTF written agreement.

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

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

**Discussion:**

See Unique Appendices AP-90 Sales Price