

ANNUAL ACTION PLAN: 2019

Substantial Amendment for COVID-19 Response: ESG, HOPWA, HOME, and CDBG

Submitted June 1, 2020

All changes to the plan (substantial amendment) are highlighted in yellow.

Executive Summary

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

1. Introduction

The State of Iowa is a HUD Participating Jurisdiction. The Annual Action Plan updates the State of Iowa's Consolidated Plan for Housing and Community Development. The Consolidated Plan is a 5-year plan to address housing and community development needs. It was submitted in 2015 and addresses the goals from 2015 to 2019. The State submits the Plan to the U.S. Department of Housing and Urban Development (HUD) to apply for funds under the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Housing Trust Fund (HTF), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs. This Annual Action Plan is for the program year beginning January 1, 2019.

In April 2020 as part of the CARES Act, Iowa was granted additional CDBG, ESG, and HOPWA funding. In order to utilize the funds this plan needs to be amended in what is known as a substantial amendment to HUD. The areas of the plan that have been amendment will be highlighted in Yellow.

COVID 19 Amendment Narrative - CDBG-CV

IEDA has received two allocations of CDBG-CV funding. The first allocation of \$14,617,483 will be used to respond to, prepare for, or prevent the spread of the COVID-19 virus in the state of Iowa's non-entitlement communities. For the second allocation of \$9,506,040 and can be utilized in the entitlement areas, the state will work with the entitlement cities to determine the amount and distribution method of these additional funds to their Cities. The entire allocation or a portion will be utilized in the entitlement areas. All funds distributed will be to prevent, prepare for, and respond to the Coronavirus with an emphasis on targeting at low-income elderly and needy children, housing market disruptions, and reducing virus transmission. IEDA will work closely with communities, stakeholders, and other state agencies to determine the best use of these funds. Understanding that there will be other state and federal dollars for COVID 19 response, it will be important to not duplicate funding, but instead discover the unmet need and fill it with these CDBG-CV funds. To that end, IEDA will develop a robust duplication of benefit process to guard against overly enriching activities. IEDA will be primarily funding public service activities with the additional CDBG-CV funds. The activities may include, but are not limited to: childcare payments, assistance to make education for children more accessible, training, meal service costs, food bank supplies, equipment for telemedicine, other medical response needs, planning, and

emergency support payments for eviction and foreclosure prevention and possibly small business assistance. The application process, eligible activities, and scoring criteria will be found on the IEDA's COVID 19 webpage for CDBG-CV funds. If additional activities are planned that are not public service related, IEDA will modify the webpage for its CDBG-CV funds that describes the eligible activities. A substantial amendment with public comment will not be completed unless over 40% of the funds or \$5,846,993 are reallocated to non-public service activities which could include construction. Seventy percent (70%) of the funds must be spent to support low to moderate income households. The public service cap of 15% has been waived for these funds as well as the 2019 and 2020 annual allocation of CDBG funds. Other waivers will be granted by HUD via a federal register notice. IEDA will follow HUD guidance and apply for waivers as appropriate and in the manner described by HUD. A portion of the Regular CDBG Annual Allocation for 2019 and 2020 will also be spent on COVID-19 response. Iowa has within its existing method of distribution a threats funds. Funds are reserved for communities facing an imminent threat to the public requiring immediate assistance. A portion of unobligated 2019 funds from the method of distribution in other set-asides can be transferred to be used to respond to COVID 19. Eligibility is for health and safety threat projects. They must meet the following criteria: An immediate threat must exist to health, safety or community welfare that requires immediate action, The threat must result from unforeseeable and unavoidable circumstances or events, Must meet one of the three national objectives of the CDBG program, No known alternative project or action would be more feasible than the proposed project, Sufficient other local, state or federal funds (including the competitive CDBG program) either are not available or cannot be obtained within the time frame necessary to address the problem. Most of these funds will be used for public service. Therefore, for the funds expended from 2019 and 2020 for public service there is an added criterion that the service must be new or expanded and not already supported by other state or local funding resources.

COVID 19 Amendment Narrative - HOME

HOME Response:

IFA, will first address the HOME TBRA MEMORADUM of April 10, 2020. IFA appreciates the opportunity to provide assistance to residents of the State of Iowa that have been affected by the COVID-19 pandemic. Current TBRA subrecipients will be able to serve households, new and existing, to get relieve from COVID-19 buy securing safe, decent, and sanitary housing during this time. In order to eliminate burdensome administration for the subrecipients rent reasonable will not be required, subrecipients current contracts will be able to pay households with full rent, security and utilities monthly bills until December 31, 2020. Tenant's contract will not have to begin at the beginning at the start of TBRA and may contain one or more of the tenant protection prohibited items. The HQS inspection can be done virtually, but the building construction date will be checked to include Lead Based Paint inspections, if needed. Re-inspections will be delayed until after the December 31, 2020 and completed within 120 days from then. IFA will allow self-certification on income. These waivers will be to serve households affected by the COVID-19 pandemic, by loss of jobs or reduction in pay, which will be documented in files.

IFA will next discuss, the HOME MEMORANDUM of April 20, 2020. IFA may see the need to utilize up to 25% of general administration cost for FY2019 and FY2020 HOME to be able to serve lowans affected by the CORVID-19. IFA may also see the need to suspend the 15% CHDO set-aside funds for 2017, 2018, 2019 and 2020. The need for assisting households across Iowa may be greater than the need for CHDO projects serving an area of the State. To assist with CHDO survival, being small non-profit organizations, IFA may provide operating funds to see the organizations through this turmoil time. Matching funds will continue to be tracked, but not required. Eligible tenants or homebuyers will be allowed to use self-certification to determine eligibility for HOME program. Inspections will be done virtually, where able. Annual re-inspections will be delayed until after December 31, 2020, but with 120 days after that date. Project that are underway and are experiencing a delay will be allowed to continue their projects without any ramification from IFA or HUD with this waiver. All the tenant files or homebuyer files will have documentation if they have been affected by the COVID-19 pandemic.

COVID 19 Amendment Narrative - HOPWA

IFA will use its Housing Opportunities for Persons with AIDS (HOPWA)-CV funding in the amount of \$104,064 to respond to, prepare for, or prevent the spread of the COVID-19 virus in the State of Iowa. IFA will distribute funds on a regional basis to its existing network of five HOPWA sponsors that together cover all 99 counties in Iowa. Annual HOPWA allocations to sponsors are made on a formula basis according to total numbers of lowans living with HIV or AIDS in each county; this data comes from the Iowa Department of Public Health each year. The additional HOPWA-CV funding will be distributed according to the same formula; each sponsor will be offered an increase in their contract according to the same percentage basis.

HUD has offered some regulatory flexibility for HOPWA-CV to respond to the COVID-19 pandemic. IFA has requested to use the waivers that have been made available so far and will continue to pursue regulatory flexibility as it is made available and as it is needed by sponsors.

COVID-19 Amendment Narrative - ESG

IFA will use its Emergency Solutions Grant (ESG)-CV funding in the amount of \$9,574,948 to respond to, prepare for, or prevent the spread of the COVID-19 virus in the State of Iowa. Funds will support a combination of all activities normally eligible under ESG, including Street Outreach, Shelter, Homelessness Prevention, and Rapid Rehousing.

Eligible nonprofit agencies and units of local government may apply for funds through one or a combination of three options, as follows:

Option 1, Formula Option for Current Grantees: This option is for agencies that are current calendar year 2020 grantees of the Iowa Shelter Assistance Fund (SAF) and/or Iowa Statewide ESG. Agencies may

request ESG-CV funding in an amount equal to 50% of their current 2020 total SAF and Iowa Statewide ESG grants. For example, an agency that received a CY2020 SAF grant for \$40,000 to provide Shelter, and a CY2020 ESG grant for \$70,000 to provide Rapid Rehousing, for a total of \$110,000, would be eligible to apply for \$55,000 in Iowa ESG-CV funding. In general, agencies must have remained open and serving participants during the COVID-19 pandemic to be eligible. Funds awarded may be used for any eligible ESG expenses in any category. Agencies must be prepared to know and follow ESG program rules, which will be especially important for agencies currently funded only with SAF. Option 1 grants are not competitive, and will not be scored. In general, they will be awarded to any eligible agency, in good standing with IFA, that submits a request. Up to approximately \$1.8 million may be used to fund Option 1 amounts.

Option 2, Regional Homelessness Prevention and/or Rapid Rehousing: This option is for agencies to apply to provide Homelessness Prevention and/or Rapid Rehousing assistance to serve a designated region. Designated regions are Iowa Coordinated Services Regions (Coordinated Entry Regions). Polk County, Woodbury County, and Pottawattamie County each normally participate in separate Coordinated Entry Regions according to their separate HUD-designated Continua of Care, but will be considered regions for this purpose. Each region will be designated a total eligible amount of both Homelessness Prevention and Rapid Rehousing dollars, and may apply for up to this amount, with some flexibility allowed between the categories to meet regional needs as they arise. Approximately \$7 million is anticipated to be used to fund Option 2 amounts.

Option 3, Special Consideration: This option is for agencies that don't fit the above categories or otherwise present justification that merits special funding consideration.

Period of Use: In any category above, funds may be used to reimburse allowable costs incurred by an agency before the award of funding (including prior to the signing of the CARES Act) to prevent, prepare for, and respond to COVID-19, as allowed by HUD. The anticipated deadline to spend ESG-CV funds will be December 31, 2021. Awarded agencies will be required to demonstrate a minimum rate of expenditure at periodic intervals in order to retain the grant. Agencies not meeting thresholds may have funds reduced and reallocated to another agency.

HUD has offered some regulatory flexibility for ESG-CV to respond to the COVID-19 pandemic. IFA has requested to use the waivers that have been made available so far and will continue to pursue regulatory flexibility as it is made available and as it is needed by subrecipients.

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.

This year for CDBG, HOME, HTF, ESG, and HOPWA our objectives and outcomes are to create decent housing, suitable living environments, and economic opportunities that address availability, accessibility, affordability, and sustainability for the following specific performance indicators:

- Homeless – 6,700 persons served (ESG & HOPWA)
- Owner-Occupied houses – 133 houses rehabilitated (CDBG)
- Housing – 0 homebuyers assisted to purchase (HOME)
- Rental – 6 units developed or rehabilitated (Home Rental - 24 units developed or rehabilitated (HTF)
- Rental – 477 households given rental assistance (HOME)
- Rental – 578 households given rental assistance (ESG & HOPWA)
- Community Facilities – 3 facilities improved or constructed (CDBG)
- Infrastructure – 20 water, sewer, or storm water upgrade projects (CDBG)
- Business – 160 jobs retained or created (CDBG)
- Downtown Business Façade Improvement – 80 business (CDBG)
- Job training and supportive services – 100 households served (CDBG)

3. Evaluation of past performance

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

Over the years the State of Iowa's CDBG, HOME, and ESG programs have all experienced great demand. The number of applications for funding far exceeds the allocation received by HUD. The 5 year consolidated planning efforts in 2015 helped the State fine tune the allocation for funding programs. The state feels confident that our targets are in line with the State needs for HUD programming.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Substantial Amendment May 2020: IEDA and IFA published in the paper and posted on its website the ability for the public to comment on the Substantial Amendment to the 2019 Action Plan. Public comment was for 5 days (May 16 -May 22) with a public hearing on day 3 (May 20 at 3:30). A total of 33 people attended the virtual public hearing which was advertised in the Des Moines Register, IEDA/IFA website, and email invitation. The Amendment to the Citizen Participation Plan incorporates the CDBG-

CV fund into the document, provides a five-day comment period, and the ability to hold virtual public hearings.

IFA and IEDA solicited public input in developing the Action Plan. The Department is committed to citizen participation both because it is a HUD requirement and because it is a valuable means for program evaluation and improvement.

Citizen participation was also solicited and comment opportunity was available on the website, www.iowaeconomicdevelopment.com as well as the IFA website, www.iowafinanceauthority.gov.

The Department solicited input during a 30-day draft review and comment period, accepting comments by mail, facsimile, electronic mail and telephone. IFA and IEDA also invited citizen participation on the Action Plan through a public hearing on October 23, 2018 from 2:30 p.m. to 4:30 p.m. at the IEDA offices located at 200 East Grand, Des Moines, Iowa.

IFA announced the start of the comment period on Twitter and Facebook with a link to the website.

IFA also sent out notification of the public comment period through their newsletter called IFAYi. It is sent to an extensive database of contacts. They also included the public comment in their newsletter sent to the organizations that assist the homeless community.

The plan was distributed and discussed at the Iowa Association of Regional Councils (IARC). Iowa's Councils of Governments (COGs) provide professional planning, programming, and technical assistance to Iowa's cities, counties, businesses, community organizations and Iowans of all ages. COGs are indigenous organizations formed by counties, cities and towns to serve local governments and their regional citizenry. The Iowa Association of Regional Councils (IARC) is the statewide professional organization for Iowa's 17 COGs. The Directors took the plans back to their regions to discuss it with their members.

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.

All public comment was in response to the ESG COVID-19 response. Here are the comments and the summary of the comments:

Comments Received with IFA Responses

1) Heather Harney, HACAP:

I have two questions about the ESG Cares funds as HACAP is thinking about how best to serve communities with assistance.

- a) Question 1: One is the HACAP's traditional ESG service area (11 counties) is split into 7 different coordinated services regions. 4 main urban regions and then 3 rural regions. The coordinated service region system works really well for providers in that are only in one region, but for the larger agencies this is difficult. Due to the large geographic coverage of our agency I was curious about the Option 3 criteria or any guidance on how that could work? Or if HACAP does do services in multiple regions thinking about how best to administer that separately. Like one contract but have funds separated and tracked per region (that is what happened in HPRP). Just trying to think down the road a little on how to do this but not be administratively burdened (I know IFA is thinking through the same).
- b) Question 2: Have you heard anything about waiving the rule that ESG providers cannot pay themselves the funds for assistance if they own permanent housing properties? I know of multiple providers (Willis Dady, HACAP, Shelter House, etc) that own permanent housing units for a high risk population. Unfortunately these providers cannot assist individuals in their own units, making at risk clients not eligible for some services. Previously when multiple providers are doing the same programming in an area and we can collaborate with one another and enroll them with a different provider and can overcome this barrier. As we are planning for these funds regionally it is just something agencies need to discuss and any guidance would be appreciated.

RESPONSE:

- a) IFA intends to accept applications per region. If an agency wishes to serve more than one region, they may indicate this in their application. Option 2 is still the best option for this.
- b) We have not heard anything recently from HUD on this issue. We would advise submitting the question directly to HUD's Ask-A-Question help desk at <https://www.hudexchange.info/program-support/my-question/>.

2) Jaymes Sime, Micah House:

I'd like to submit the following comments for consideration for the ESG. Let me know if there is a specific portal or process.

The ESG program typically provides funding to:

1. Engage homeless individuals and families living on the street;
2. Improve the number and quality of emergency shelters for homeless individuals and families;
3. Help operate these shelters;
4. Provide essential services to shelter residents;
5. Rapidly re-house homeless individuals and families; and
6. Prevent families and individuals from becoming homeless.

Emergency Shelters are responsible for items 2,3, and 4 of the above-listed funding priorities. Per the ESG-CV notice from HUD, ***The funds are not subject to the spending cap on emergency shelter and outreach under 24 CFR 576.100(b)(1)***. Why is the Iowa Finance Authority proposing to limit the funding to support shelter services to a pool of funding that is 19% of the total

award? That 19% will be split amongst Shelter and Street Outreach, so potentially 10% of the total allocation will go to support shelter services. In conversations with shelter providers, they've been one of the few providers who've incurred additional costs and risks associated with the response to coronavirus. Within HUD guidelines for funding, shelters are one of the hardest programs to fund, yet most critical, and most at risk due to the nature of a health pandemic. I agree that housing and prevention have to be a part of the conversation, but shelters have to have the staffing and operational capacity for Rapid Rehousing to work in most communities.

RESPONSE:

We recognize the critical role and the increased needs of shelters at this time. This is why shelters currently funded through either ESG or SAF and that have remained open and serving clients are automatically eligible for a 50% increase in their current funding, without needing to apply competitively. In some communities, seeking FEMA non-congregate sheltering and other sources of funding are also helping meet additional needs.

We are interested in hearing more from shelters across the state about continuing needs that are not currently being met. HUD will be issuing a second round of ESG-CV funding by the end of June, and the State of Iowa may be eligible for additional funds through this. If so, additional input will be especially important in determining how those funds may best be directed.

No change at this time.

3) Tim Wilson, Home Forward Iowa:

The following comments are submitted in response to the proposed use of Emergency Solutions Grant (ESG)-CV funding you shared on May 11, 2020.

Option 1

This plan as described seems straightforward and a fair way to acknowledge programs already working. Recipients of ESG project funding should use these additional funds as broadly as possible to address needs in their Coordinated Entry Regions (CSRs). This includes participating in required weekly/biweekly "pull meetings" and applying these additional funds to the highest-need households first. In some CSRs, this may mean that an agency which normally focuses on serving a particular sub-population and/or narrow geographic area uses the new funding to serve other households because they have the highest need despite not meeting that agency's normal profile. In general, these new CARES Act funds should be used to broadly serve those with the highest needs created by the COVID-19 pandemic. This may require ESG grantee agencies to collaborate with new partners in order to serve those most in need.

Option 2

Basing allocations of these funds utilizing the Balance of State's Coordinated Entry Region system is a sound idea. The formula should incorporate population as the major component of the allocation plan. There is currently wide geographic unevenness in the allocation of ESG (and other HUD homeless) funds. However, no struggling Iowa household should suffer because housing services that meet their needs are not offered where they happen to be experiencing

homelessness. It is our hope that this regionally-based model – while also incorporating both need and performance as variables – becomes the standard for future ESG and SAF allocations. The CARES Act provides an opportunity to begin to address gaps in terms of geography and types of household, especially for the general homeless population. Competent and willing service providers throughout the state have recently been identified by HFI. A list of these agencies and contacts was shared with you in an April 22 email. This list includes agencies in what is currently considered the Balance of Counties. For funding allocation, the area including the western ten counties and the area including fifteen counties to the south and east of Polk should be considered separately in the allocation of eligible funding. Finally, the fact that two non-Balance of State Continuums of Care included in the proposed plan were allocated separate CARES Act funds should be acknowledged and reflected in the allocation amounts. These areas are not at the same starting line as the CSRs or Pottawattamie County and this fact should be reflected in some way in the funding allocation formula.

Option 3

It seems prudent to allow for circumstances and service needs not foreseeable based on the past. It is also wise to limit the funding available in this category.

General

We assume there will be additional ESG support allocated to Iowa in a second funding opportunity via the CARES Act. Anticipating this, it would be advisable for IFA keep in mind all relevant guidelines and goals issued by HUD specific to the CARES Act in closely monitoring the use of this initial wave of funding. It is also wise to look for any gaps in services that persist after the allocation of these funds and to structure the allocation of any additional funds to effectively address those gaps.

Thank you for this opportunity to provide a response to the draft plan.

RESPONSE: Thank you for these comments. No changes made.

Additional comments from Tim Wilson submitted later:

Please add these comments to those I previously submitted. They relate to the more detailed plans for ESG allocation under Option 2:

"During the public hearing earlier this week, it was indicated that IFA and IEDA would prefer that a single agency apply for all the funds to conduct rapid re-housing and prevention in a region and if I heard correctly, that a grantee agency not engage partner agencies. Though I understand a desire to not be overwhelmed with applications and program monitoring, I think this approach contradicts the very collaborative approach that the CSR member agencies have been building over the past two-and-a-half years. I also think it is not particularly client-centered, since this approach would inevitably lead in some regions to agencies serving populations with whom they have little or no experience or agencies providing services with which they have no experience or both. I urge that the process be open to multiple applications to serve the same region and to funding more than one provider, especially if it is clear that collaboration is to take place between/among submitting agencies which will address both stated targets for prevention and rapid re-housing services."

Knowing that more applications and grantees adds to the administrative burden of administering the program, I can at least offer assistance with the former. If desired, I am more than happy to help with recruiting volunteers to serve as reviewers of ESG project applications. Let me know how many and any particular criteria you are looking for and I will use my extensive contact network to find as many qualified and willing people as possible.

Thanks again for the opportunity offered for response and comment on the plan.

RESPONSE:

IFA's preference is still that a single agency serve as applicant and lead agency for a region; however, in response to multiple comments, we will allow subcontracts within a region.

4) Bob Sheehan, New Visions:

We are grateful for the allocation we hopefully receive as part of Option 1 that you forwarded to us earlier this week. I do not want my comments to sound like sour milk, as I agree that Options 2 and 3 are important to our continuum but would like IFA to reconsider the level of funding in all three options and distribute the dollars using a different formula.

First, I think it important for you to know that MACCH has initiated a Housing Problem Solving (HPS) grant to help prevent the escalation of homelessness. NVHS is an Access Center for those services and collectively (Six Agencies in the Metro area) in 6 short weeks, we have allocated over \$200,000 to prevent further homelessness to those who are close to losing their home. MACCH offers these funds through Access points, which are all homeless provider agencies that are able to prevent homelessness by meeting needs like utility, transportation, rent help, or any other need requiring dollars. We are attempting to use this fund after public resources are not available.

I also would add that our housing stock was not adequate before the crisis and housing availability has not increased as a result of this crisis. In my judgement the dollars allocated to Option 2 are inflated and may not be practical.

If I suspend judgement on all the possibilities for those dollars, the work we do starts with deferring as many as we can from shelter, which often leaves clients with multi occurring issues for those who cannot be deferred. The further complicated fact is that our shelter, like many shelters, is able to function during regular times because of partnerships with other agencies. (19 agencies at a variety of levels for our agency alone).

When this pandemic began our partners left our shelters. We had to assume as many roles as we could. A few weeks later a few have come back into our shelter, while most are now working virtually which works fine for their organizations but does not work for us. It also adds work and burden to our staff who remains and is asked to make sure all things technological work correctly for or virtual partners. In other words, we find ourselves alone and having to meet more needs for other organizations while providing safety for the men and each other at New Visions.

The most difficult issue for us exists for everyone. When does this end? We have done the PPP, we have foundations that have helped us, (I am sure other shelters do not have the resources we have as part of the MACCH CoC), so we have been able to absorb the extra expenses since March. All those resources will be used up by mid-June.

The formula you have laid out would financially take us through the summer. Like most COVID-19 Resources, there is a full stop at Public and Private Dollars at this time.

Our only thought at this time, while I am appreciative we are included in Option 1, I would suggest the distribution formula be evaluated so that Option 1 is given a greater proportion than it currently is allocated in the current proposed.

I appreciate all you do and look forward to 2021 !!

RESPONSE:

Please see response to Comment #2.

5) Linda Munden, Emergency Residence Project:

Is there available an individual county breakdown for the Two Rivers 70/30 HP/RRH split in Table 2? For planning purposes in meeting the needs in each of our 5 counties, I want to be able to focus resources where they will benefit people most, even this early in the process. If Marshall has been hit the hardest, for example, that would be good to know.

As far as one agency being able to do all of the Option 2 work, I have serious reservations. I know the challenges of being the only general population homeless provider and leading Two Rivers as a very small agency. I'm going to meet with our ED tomorrow and perhaps have more comments.

RESPONSE:

As for calculations, amounts were calculated after first pulling all the counties together into regions, so this is all that is available.
Please see response to Comment #3.

6) Jess Bleile, Institute for Community Alliances:

I was on the call this afternoon but didn't have a microphone to ask my question, so I wanted to send you a quick email. If a region is applying for funding for RRH and HP, would one agency apply as the fiscal agent for the region, or if the thought that one agency would apply and provide services to the entire region?

RESPONSE: Please see response to Comment #3.

7) Angie Arthur, Polk County Continuum of Care

- a) Funding that is received through the entitlement areas bring great value to Polk County. The funding provides support to West Des Moines and Des Moines residents. However, we have over 200,000 (42.4%) of our Polk County residents that do not receive ESG or CDBG funds from entitlement allocations. The funds received through the proposed allocation of Iowa ESG funds to Polk County is appreciated and necessary to provide the opportunity of support to all our citizens. When non-entitlement funding from Iowa isn't allocated to Polk County, there is a significant gap in services for a large portion of our population.
- b) As a Continuum of Care (CoC) and a region for the ESG Option 2 funds, we recommend that individual applications must be coordinated with the local CoC based on priorities established by the local CoC.

I appreciate the ability to provide input on the Action Plan and allocation.

RESPONSE:

- a) The plan as proposed provides additional funding to the ESG entitlement cities.
- b) We agree that support from the applicable local CoCs is important. This is more difficult over the large 96-county Balance of State. For the smaller CoCs, we will recommend a letter of support as part of the application.

8) Tess Cody, ACCESS

I hope this email finds you well. Writing to add public comment for the plan to administer CARES ACT funds through ESG. I believe my colleagues at the Two Rivers Region will be jointly submitting some notes, but also wanted to make sure to include some specific to our agency:

As a region we have set up referral systems that work well and are based on the unique populations we serve. Under the current proposal for option 2 Homelessness Prevention and Rapid Rehousing funds, there would be one regional entity receiving the funds. Putting all of the option 2 CARES Act funds into one agency makes identifying roles more complicated. It will create systems where clients who are receiving shelter, case management and other services from one agency will need to go to a second agency in order to access the financial assistance through homelessness prevention and rapid rehousing. This increases the burden on low income Iowans to navigate multiple systems rather than meeting their needs in one place.

In addition, this set up would put all of the dollars outside of victim service providers in most regions. At times the housing needs of domestic violence victims are different than that of what a homelessness service provider can provide. This includes eligibility by being "fleeing domestic abuse." The proposed structure would mean in some cases requiring a person experiencing homelessness to disclose victimization to non-confidential, non-victim service providers in order to access or be eligible for the CARES funds. This is counterproductive to the DVIMS and other protections we have created as a state.

It seems like utilizing the structure described in option 1 for a larger share of the funds could help alleviate this. Allowing joint applications per region or allowing multiple agencies per region would also be options.

RESPONSE:

Please see response to Comment #3.

9) Hope Metheny, YSS

- a) We would like to see special populations being served in Option 2 of the Regional Homelessness Prevention and/or Rapid Rehousing dollars. Doing this will allow special populations to be served quickly with experts in the field. This would mean that more than one provider per region could apply for these dollars.
- b) For Two Rivers region we would like to see the split of prevention/rapid rehousing dollars to be closer to a 60/40 or even a 50/50 split. The reasoning for this is that City of Ames is also getting an allotment of CARES act money (around 354k), and they are proposing that all of this money would be used in prevention area at this time. This would allow more of the prevention dollars to be used throughout the rest of the region and not as many dollars to be used in Ames (the largest city in the region). Due to that we feel that the rapid rehousing in the region could be raised higher to ensure all of the funds are used quickly and efficiently without running into barriers of duplication of benefits in the region.
Thank you for your consideration.

RESPONSE:

- a) Please see response to Comment #3.
- b) The plan recommends amounts per region for HP and RRH, but there will be flexibility between these categories once awarded.

10) Ryan Bobst, Humility Homes & Services

Thanks for all of your work related to gathering input and sharing this out! I appreciate it!

I like the three options. I think it would be good for option 2 to allow partnerships to emerge - for instance, one entity apply for homeless prevention and another entity apply for rapid rehousing (what our region plans to do) in order to allow entities to play to their strengths and to have the most effective and efficient use of the funds.

I'm hard pressed to think any one agency can administer all of these funds on their own and thus encouraging collaboration I think sets communities up for success.

RESPONSE:

Please see response to Comment #3.

11) Linda Munden, Emergency Residence Project

Is there available an individual county breakdown for the Two Rivers 70/30 HP/RRH split in Table 2? For planning purposes in meeting the needs in each of our 5 counties, I want to be able to focus resources where they will benefit people most, even this early in the process. If Marshall has been hit the hardest, for example, that would be good to know.

As far as one agency being able to do all of the Option 2 work, I have serious reservations. I know the challenges of being the only general population homeless provider and leading Two Rivers as a very small agency. I'm going to meet with our ED tomorrow and perhaps have more comments.

RESPONSE:

Please see response to Comment #3. As for calculations, amounts were calculated after first pulling all the counties together into regions, so this is all that is available.

12) Craig Fenton, Transitions DMC

I am confused by the plans. Does Transitions DMC fall into Category 2 or Category 3, since we are not under a State of Iowa or HUD Contract? In many ways category 3 seems like it makes sense. Working with the others in the region we are assigned seems competitive to the point that if left to those currently getting funds we will not get anything for the needs of our area?

RESPONSE:

Option 1 is only for current grantees. Options 2 and 3 are open to any agency that qualifies. Option 2 is best for agencies with experiencing administering Homelessness Prevention and/or Rapid Rehousing assistance. Option 3 is intended to be the best fit for an agency providing shelter that isn't currently funded through ESG or SAF as such.

13) Ben Brustkern, Friends of the Family

Consider allowing multiple contracts for service within the Coordinated Services Region to ensure that the needs of special populations are met and services are provided in a way that best leads to success.

As an agency that provides different levels of service across 5 Coordinated Services Regions we hope to have the opportunity to provide further ESG services in multiple regions. We also know that not all regions have agencies that have capacity to administer these dollars and meet ESG regulations. However, multiple partners in a region could help build capacity for future projects that can lead to ending homelessness in Iowa.

With several agencies receiving increased funds under option 1 you could allow those agencies to apply within option 2 and receive larger allocations based on quality applications and also allow for 1-2 new programs to be funded in option 2. This would lead to potential new contracts in CSR but also allow you as the funder to limit overall contracts.

RESPONSE:

Please see response to Comment #3.

14) Tess Cody, ACCESS; Jodi Stumbo, Emergency Residence Project; Linda Munden, Emergency Residence Project (submitted by Linda Munden as joint comments)

The following comments and concerns were identified through conversations between the leadership of Shelter Housing Corporation (ERP) and Assault Care Center (ACCESS). Thank you in advance for your time and thoughtful consideration.

- a) In whatever form the application process moves forward, either as a regional process or through individual agencies applying, we understand that it must be a collaborative effort. For example, in the event that a regional application process were to be implemented, no one agency is capable of anticipating the needs of a population it has not historically served and cross-agency discussions must be held prior to completing the application.

On the other hand, if individual agencies are invited to apply, the tentative regional funding amount should be considered and the combined totals for agencies approach but not exceed that regional amount. In the case of Two Rivers, that number is \$295,913, and the split between Homeless Prevention and Rapid Rehousing should be 70.5% (\$208,619) and 29.5% (\$87,294) respectively.

Requirements, Restrictions, and Eligible Costs

- b) We understand that previously eligible costs for ESG and SAF under current contracts would be the same for this funding, with none eliminated.
- c) It has been our understanding that there would be no match requirement and believe that should be the case.
- d) Costs that have not been eligible should be considered, including staff activities for things like staff meetings time and other aspects of being employees of the agencies funded.

Coordinated Entry

- e) There is no funding for coordinated entry at this time. Given the likely increased coordination required in order to successfully administer the CARES Act assistance, we would like this to be an allowable cost.

Data and Administration Costs

- f) If current ESG 2% administration and 5% data entry maximums carry through to the Option 2 funding, for Two Rivers the amounts follow.

\$295,913.63 Total potential award

2% Admin = \$5,918.27

5% Data = \$14,795.68

For a region-only application, the administration staff time would be inadequate as it involves managing many agencies and much documentation across several counties.

- g) As a region, we have set up referral systems that work well and are based on the unique populations we serve. Under the current proposal for Option 2 HP and RRH funds, there would be one regional entity receiving the funds. Putting all of the CARES Act funds into one agency would make identifying roles more complicated. It would create systems where clients who are receiving shelter, case management, and other services from one agency need to go to a second agency in order to access the financial assistance through HP and RRH. This would increase the burden on low-income lowans to navigate multiple systems rather than meet their needs in one place.

In addition, this set up would put all of the dollars outside of victim service providers in most regions. At times, the housing needs of domestic violence victims are different from that of what a homelessness service provider can provide. This includes the eligibility of "fleeing domestic abuse." This structure would mean, in some cases, requiring a person

experiencing homelessness to disclose victimization to non-confidential, non-victim service providers in order to access or be eligible for the CARES Act funds. This is counterproductive to the DVIMS and other protections we have created as a state.

RESPONSE:

- a) See response for Comment #3.
- b) Eligible costs will follow the usual rules for the ESG program, with any applicable adjustments, flexibilities, or waivers from HUD related to the CARES Act.
- c) Correct.
- d) Eligible costs follow the federal ESG Interim Rule, with any modifications from the CARES Act for these funds, as well as federal cross-cutting regulations at 2 CFR 200. If an agency has questions about eligible staff costs, it is recommended they consult with these resources, and follow up with IFA staff as needed. Employee costs for things like staff meetings are often eligible, depending on the meeting topic and if it's necessary to carry out the ESG assistance.
- e) The costs required for agencies to participate in Coordinated Entry are allowable under ESG rules.
- f) The intention is not that one agency serves as administrator for a region, managing multiple sub-contracts, but rather that one agency provides assistance throughout a region. Amounts allowed for Administration will be higher than 2%, as the CARES Act provided for additional Administration funding.
- g) See response for Comment #3.

Comments below are verbal comments from the public hearing on May 20, 2020; comments summarized and/or edited for brevity:

15) Craig Fenton, Transitions:

- a) Will the funding be allowed to cover expenses already incurred since the start of the pandemic?
- b) Is there a specific amount set aside for the Option 3 described in the plan?

RESPONSE:

- a) Yes. The CARES Act allows this. We would anticipate that expenses could begin in March.
- b) No. We anticipate funding this through any amount remaining that is not used through Option 1. But this is flexible.

16) Tim Wilson, Home Forward Iowa:

- a) How were the regional allocations developed?
- b) What will the application process look like? Online?
- c) Will there be just one application accepted per region? Or will subcontracts be allowed?
- d) Recommendation: An agency serving a whole region should serve all subpopulations of people needing assistance.

RESPONSE:

- a) The Institute for Community Alliances, our HMIS data partner for Iowa, used data to develop recommendations for regional amounts. The process and data used for this is explained in the attachment that was distributed on May 19, 2020, with the ESG Notice that went out to stakeholders.
- b) The application process will likely use the same online portal that is usually used by IFA for ESG and SAF applications each year.
- c) The preference is to have one agency per region administering Prevention and Rapid Rehousing. There may be some flexibility for this, as we understand regions are all different.
- d) See response to Comment #3.

17) Hope Metheny, YSS

- a) Can you explain how the allocation was made to Polk County, since they receive additional funds from HUD for Des Moines?
- b) How about an agency that works in multiple regions; how will this work?

RESPONSE:

- a) The Institute for Community Alliances, our HMIS data partner for Iowa, used data to develop recommendations for regional amounts. The process and data used for this is explained in the attachment that was distributed on May 19, 2020, with the ESG Notice that went out to stakeholders. This includes Polk County.
- b) IFA intends to accept applications per region. If an agency wishes to serve more than one region, that will likely mean submitting more than one application. We will attempt to clarify this when the application is released. After reviewing and selecting awardees, if there is an agency selected to provide assistance in more than one region, we will determine at that time if one or multiple contracts will be issued.

18) Jaymes Sime, Heartland Family Service:

Has there been consideration of capacity for the Option 2? Such as having enough landlords willing to work with the program to actually be able to make use of all this funding? The needs of shelters are also very high right now. Would like consideration of additional dollars for shelter at this time.

RESPONSE:

See response to Comment #2.

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
CDBG Administrator	IOWA	Economic Development Authority
HOPWA Administrator	IOWA	Iowa Finance Authority
HOME Administrator	IOWA	Iowa Finance Authority
ESG Administrator	IOWA	Iowa Finance Authority
	IOWA	Iowa Finance Authority

Table 1 – Responsible Agencies

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

1. Introduction

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

The state reached out to the Olmstead Commission to review CDBG programming. This organization has reached out to IEDA and IFA in the past to discuss providing supportive services. A portion of CDBG funds are allocated to providing jobs funding for LMI individuals along with an employment related transportation program. In the past non-profit agencies have also sought funding for mental health infrastructure projects through CDBG. Workshops relating to funding opportunities are offered by both IFA and IEDA.

IFA reached out to current and former HOME recipients as well as ESG and HOPWA recipients to get their input regarding the action plan. IFA utilizes a Constant Contact strategy that involves thousands of email addresses of people and entities that have an interest in affordable housing and homeless services. IFA also communicates with these same entities through a monthly newsletter entitled IFAfyi.

IFA meets regularly with ESG and HOPWA recipients on a quarterly basis to discuss priorities and issues that arise when implementing the programs.

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

IFA is the Iowa Balance of State Continuum of Care (CoC) Collaborative Applicant and also charged by statute to provide administrative support to the Iowa Council on Homelessness, which is the decision-making body for that same CoC. This close partnership fosters frequent collaboration. As Collaborative Applicant, IFA has also begun receiving HUD CoC Planning Grants since 2016, and is using these grants to develop a system of homelessness Coordinated Services Regions throughout the CoC. The regions are working toward six common goals to address the needs of persons experiencing homelessness in the CoC, including 1) Regional Coordination (inclusive process to engage stakeholders); 2) Coordinated Entry Participation (supporting and expanding); 3) Data Coordination (HMIS participation, bed coverage, and the unsheltered PIT Count); 4) Common Standards (for operations and services); 5) Baseline Services Planning (ensuring availability of at least emergency shelter and RRH); and 6) Balance of State CoC Participation. IFA also provides administrative support to the CoC Committee and Iowa Council on Homelessness in annually reviewing and monitoring the performance of CoC-funded projects, including

progress toward identified system and program outcomes that address the needs of persons experiencing homelessness.

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

IFA made minor updates to its 2019 calendar year ESG allocation procedures this year, after much more significant changes last year. Some of the significant changes last year included: combining the ESG competition with the state Shelter Assistance Fund competition; changing the formula for eligible budget requests, according to beds available, bed utilization rate history, population served, counties served, and other factors; updating the funding recommendation process to a more objective and uniform calculation based on score received and available funds; and shifting the competitive application format from narrative-based to more objective performance-based criteria. This year, the most significant shift was allowing some applicant agencies to receive funding from both the ESG program and the Iowa Shelter Assistance Fund (SAF) program at the same time in 2019; this was done to make better use of additional SAF funds available this year.

IFA strives to meaningfully engage various stakeholders to provide input regarding all significant changes to the ESG program. IFA consults with the Iowa Council on Homelessness, the Iowa Balance of State CoC, Polk County CoC representatives, ESG applicants, and other interested stakeholders. The Iowa Council on Homelessness's Policy & Planning Committee reviews and provides recommendations regarding initial plans. IFA then develops draft application materials based on feedback received, and then releases the materials for public comment for a specified time period. IFA drafts written responses to all comments and posts all comments and responses online. Comments are significant in helping IFA shape the final ESG application materials and policies, including how funds will be allocated, how performance outcomes will factor in to scoring, and how other priorities will factor in to program planning.

Regarding the operation of the HMIS and the comparable DVIMS system for domestic violence victim service providers, IFA continues to collaborate closely with the HMIS Lead Agency for Iowa, the Institute for Community Alliances.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	IOWA COMMUNITY ACTION ASSOC
	Agency/Group/Organization Type	Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	IEDA interacts with CAP agencies through work on our CDBG owner-occupied housing program. They were also sent a copy of the Draft Plan. The association is also a HOME recipient that has two contracts to provide TBRA to eligible individuals.
2	Agency/Group/Organization	SOUTHERN IOWA REGIONAL COUNCIL OF GOVERNMENTS
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Council of Governments (COG) provide CDBG local administration assistance to funded Cities and Counties. IEDA regularly engages each COG and requests feedback on programming. They were also sent a copy of the draft plan.
3	Agency/Group/Organization	Iowa Association of Regional Councils
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Council of Governments (COG) provide CDBG local administration assistance to funded Cities and Counties. IEDA regularly engages each COG and requests feedback on programming. They were also sent a copy of the draft plan.
4	Agency/Group/Organization	IOWA LEAGUE OF CITIES
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The state regularly sends announcements for funding opportunities to the League of Cities so that they can share with their members as well as other opportunities to comment on programming. They were also sent a copy of the draft plan.
5	Agency/Group/Organization	IOWA STATE ASSOCIATION OF COUNTIES
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The state regularly sends announcements for funding opportunities to the Association of counties so that they can share with their members as well as other opportunities to comment on programming. They were also sent a copy of the draft plan.
6	Agency/Group/Organization	Olmstead Consumer Task Force
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Economic Development

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The state has reached out to the Olmsted Commission to discuss programs that their clientele could benefit from. They have also provided comment on the Action Plan and the CAPER in the past. They were also sent a draft of the Action Plan.
7	Agency/Group/Organization	Iowa Main Street Program
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Main Street Iowa Program is an economic development and historic preservation program administered by the State. The communities they serve are eligible CDBG recipients. Through annual meetings and as recipients the main street communities have given IEDA comments on programs. They also received a copy of the draft plan.
8	Agency/Group/Organization	IOWA CIVIL RIGHTS COMMISSION
	Agency/Group/Organization Type	Housing Service-Fair Housing Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Iowa Civil Rights Commission has conducted fair housing workshops and testing for the State. They have also been a resource for IFA, IEDA, and our recipients about fair housing. They also received a copy of the draft plan.
9	Agency/Group/Organization	Iowa Department of Natural Resources
	Agency/Group/Organization Type	Other government - State

	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	IDNR administers the SRF program and is a co-funder on most of our water and sewer infrastructure projects. They offer us helpful timing advice to make certain that the structure of our programming meets the needs of Iowa Communities as it relates to infrastructure projects. They also received a copy of the draft plan.
10	Agency/Group/Organization	Iowa Public Transit Association
	Agency/Group/Organization Type	Services-Persons with Disabilities Services-Employment
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	IEDA worked with the Iowa Public Transit Association to create a program for employment transportation services. They also received a copy of the draft plan.
11	Agency/Group/Organization	USDA RURAL DEVELOPMENT
	Agency/Group/Organization Type	Public Infrastructure
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	USDA-RD is a co-funder on most of our water and sewer infrastructure projects. They offer us helpful timing advice to make certain that the structure of our programming meets the needs of Iowa Communities as it relates to infrastructure projects. They also received a copy of the draft plan.
12	Agency/Group/Organization	Iowa Association of Engineers
	Agency/Group/Organization Type	Infrastructure

	What section of the Plan was addressed by Consultation?	Infrastructure
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The IAOE is invited to our application workshops and other events. IEDA looks to them to provide feedback on our infrastructure programs. They have received a copy of the draft plan.
13	Agency/Group/Organization	COMMUNITY HOUSING INITIATIVES
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	CHI is Iowa's largest CHDO and has seven active HOME rental contracts. CHI covers 98 of the 99 counties in Iowa.
14	Agency/Group/Organization	AFFORDABLE HOUSING NETWORK, INC.
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	AHNI is a CHDO operating in one of Iowa's largest metropolitan areas. AHNI currently has four HOME contracts including rental and TBRA.
15	Agency/Group/Organization	CENTRAL IOWA SHELTER & SERVICES
	Agency/Group/Organization Type	Services-homeless

	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Central Iowa Shelter & Services is the largest shelter in Iowa. It is in a unique position to provide assistance since it also is located with the City of Des Moines. CISS can provide a different perspective by providing us feedback concerning how are priorities overlap with the City of Des Moines' priorities.
16	Agency/Group/Organization	CAPAX INFINITI HOUSING
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Capax provides TBRA to low-income individuals in the Des Moines area they have also have started to develop rental property. The organization provides a unique perspective on what type of affordable rental is needed and the great need for affordable housing.
17	Agency/Group/Organization	University of Iowa
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS Other government - State
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The University of Iowa is one of our HOPWA agencies that provide services. They provided input on the implementation of the program since they are a relatively new recipient.

18	Agency/Group/Organization	PRIMARY HEALTH CARE, INC
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Landlord association are the boots on the ground and know the needs in the communities.
19	Agency/Group/Organization	Des Moines Area Metro Planning Organization
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Des Moines MPO is the regional planning organization for Polk and surrounding counties

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	Iowa Finance Authority	Goals of the Iowa Balance of State Continuum of Care include continuing to expand the system of Coordinated Services Regions, including the six goals of these regions as described earlier (in the section that describes Coordination with Continuum of Care), further developing Coordinated Entry, and improving system performance across a range of measures. These goals overlap closely with goals that have been otherwise noted in the Action Plan to address homelessness in the State of Iowa.

Table 3 - Other local / regional / federal planning efforts

Narrative

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

IEDA and IFA solicited public input in developing the Action Plan. The state is committed to citizen participation both because it is a HUD requirement and because it is a valuable means for program evaluation and improvement.

Public comment opportunity was available on the IEDA and IFA websites

(www.iowaeconomicdevelopment.com and www.iowafinanceauthority.gov). IFA announced the start of the comment period on social media, including Twitter and Facebook, with a link to the agency's website. IFA provided notification of the public comment period through their electronic newsletter, IFA fyi, which is sent out through a large listserv of housing and development contacts across Iowa. IFA also included information on the public comment opportunity in their newsletter sent to the organizations that assist the homeless community.

The state solicited input during a 30-day draft review and comment period, accepting comments by email, mail, fax and telephone. IEDA and IFA hosted a public hearing on the Action Plan on October 23, 2018 from 2:30 p.m. to 4:30 PM.

The draft Annual Action plan was shared with the Iowa Association of Regional Councils (IARC). The Iowa Association of Regional Councils (IARC) is the statewide professional organization for Iowa's 17 Councils of Governments (COGs). COGs provide professional planning, programming, and technical assistance to Iowa's cities, counties, and community organizations. Iowa's COGs work closely with the HUD programs included in the Annual Action Plan.

Throughout the year IEDA and IFA reach out to affected populations to understand their needs. IEDA has a number of workshops and events open to communities and those that serve them like the Council of Governments to learn about programs, but to also express how programs can change to be more impactful.

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	Environmental Review Training	CDBG Administrators	40 - Council of Government Staff	A portion of the day was spent discussing programming and if any changes were necessary. There were just general comments.	All comments were accepted	
2	Davis Bacon Training	CDBG Grant Administrator	40 - Council of Government Staff	A portion of the day was spent discussing programming and if any changes were necessary. There were just general comments.	All comments were accepted	
4	2019 Application Workshop	Non-targeted/broad community	125 - council of government staff, county staff, and community staff, engineering staff, and partner agencies	A portion of the day was spent discussing programming and if any changes were necessary. There were just general comments.	All comments were accepted	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Public Hearing	Non-targeted/broad community		none	none	
6	Main Street Iowa Conference	Non-targeted/broad community	200 - County and Cities	session on the downtown revitalization program. Comments were positive.	all comments were accepted	
7	Public Meeting	Non-targeted/broad community	Over 800 attendees were at the HousingIowa Conference. IFA annual holds this conference to provide education and interaction with our stakeholders	There were only general comments	all comments were accepted	
8	Public Meeting	Non-targeted/broad community	IFA staff provided informational items detailing the services we offer for people interested in affordable housing.	There were only general comments	all comments were accepted	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
9	Public Meeting	Homeless Service Providers	IFA discussed several programs including the State Housing Trust Fund, ESG, CoC, and HOPWA.	There were only general comments	all comments were accepted	
10	Public Meeting	Non-targeted/broad community	IFA staff provided informational items detailing the services we offer for people interested in affordable housing.	There were only general comments	all comments were accepted	
11	Fair Housing Training	CDBG Administrators	40- Council of Government Staff	CDBG program and possible changes were discussed. There were only general comments.	all comments were accepted	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

All the proposed budgets will be proportionally increased or decreased from the anticipated resources to match actual allocation amounts. In the draft Plan document these will be estimates. In the final Plan document these will be actual allocation amounts. The amounts listed in AP-20 will also be proportionally increased or decreased from the anticipated resources to match actual allocation amounts. In the draft Plan document these will be estimates. In the final Plan document these will be actual allocation amounts.

Additional CARES Act funds to prepare for, or prevent the spread of the COVID-19 virus in the state of Iowa are highlighted below and characterized as CDBG-CV, ESG-CV, and HOPWA-CV. No additional funds were received as part of the HOME program. However, they are adding additional funds to the existing TBRA program.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	23,967,798	57,776	0	24,025,574	0	Program Income transferred from NSP 3 program.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	7,088,101	800,000	0	7,888,101	0	

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: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	634,838	0	0	634,838	0	Use of funds should not include "Permanent housing in facilities" or "Short term or transitional housing facilities"
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	2,655,662	0	0	2,655,662	0	Use of funds should not include "Conversion and rehab for transitional housing"

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	Use of funds should only be Admin and Planning, Multifamily rental new construction and Multifamily rental rehab
ESG-CV	public - federal	Admin and Planning Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing Other	9,574,948	0	0	9,574,948	0	Additional ESG funds allocated to Iowa to prevent, prepare for, and respond to the coronavirus (COVID-19).

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: \$		
HOPWA-CV	public - federal	Admin and Planning Permanent housing placement STRMU Supportive services TBRA Other	104,064	0	0	104,064	0	Additional HOPWA funds allocated to Iowa to prevent, prepare for, and respond to the coronavirus (COVID-19).
CDBG-CV	public - federal	Admin and Planning Public Services Other	24,123,523	0	0	24,123,523	0	Additional CDBG funds allocated to Iowa to prevent, prepare for, and respond to the coronavirus (COVID-19).
CDBG-DR	public - federal	Housing Multifamily rental new construction Other	0	0	0	0	0	Reallocation of remaining CDBG-DR funds.

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied The State of Iowa makes every effort to leverage CDBG, HOME, HTF, ESG and HOPWA funds with non-federal funding resources, including many of the programs identified below. In the past, HOME funds have been leveraged by significant amounts and varying types of private and non-federal public funds. Rental projects typically tend to be better leveraged than owner-occupied rehabilitation or homeownership assistance projects. IFA will utilize a portion of SAF to offset the match requirement at the grant (IFA)-level as well. The non-housing community development program also generates considerable leveraging by local and private funds through local effort requirements built into the state’s funding strategy.

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

While the state does not have available state-owned land to meet the needs of this Consolidated Plan, it encourages applicants and municipalities to use underutilized locally owned land or property to leverage the federal funds devoted to those projects.

Discussion

Iowa also has a many federal and state programs that support community development, housing, and infrastructure. For a complete description of these programs, please access the 2019 Action Plan on IEDA's website: <https://www.iowaeconomicdevelopment.com/our-agency-detail-resources/6501>

Annual Goals and Objectives

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

Introduction:

Although the HOME program did not receive any additional funding in the CARES Act, they did re-program some funds into the existing TBRA program. Therefore, the goal for that outcome indicator has changed and increased to potentially 477.

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Creation & preservation of affordable rental hsg	2015	2019	Affordable Housing Public Housing		Limited Housing Opportunities	HOME: \$3,850,657 HTF: \$2,700,000	Rental units constructed: 30 Household Housing Unit Rental units rehabilitated: 0 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 477 Households Assisted
2	Creation-Preservation of Affordable Homeownership	2015	2019	Affordable Housing		Limited Housing Opportunities	CDBG: \$5,272,783	Homeowner Housing Rehabilitated: 133 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Preserve Short & Long-term Homeless Facilities&HSG	2015	2019	Affordable Housing Homeless		Limited Housing Opportunities Limited Non-Housing Supportive Services	ESG: \$9,604,948	Public service activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 3000 Households Assisted Homeless Person Overnight Shelter: 6000 Persons Assisted Homelessness Prevention: 25000 Persons Assisted
4	Preserve Short & Long-term Spc Need Facilities&HSG	2015	2019	Affordable Housing Non-Homeless Special Needs		Limited Housing Opportunities	HOPWA: \$104,064 ESG: \$2,350,000	Tenant-based rental assistance / Rapid Rehousing: 1061 Households Assisted Homeless Person Overnight Shelter: 4300 Persons Assisted Homelessness Prevention: 1160 Persons Assisted
5	Continue Supportive Srvs-Persons with HIV/AIDS	2015	2019	Non-Homeless Special Needs		Limited Non-Housing Supportive Services	HOPWA: \$40,000	Public service activities other than Low/Moderate Income Housing Benefit: 150 Persons Assisted
6	Continue Support Srvcs-Homeless Persons	2015	2019	Homeless		Limited Non-Housing Supportive Services	HOPWA: \$40,000	Public service activities other than Low/Moderate Income Housing Benefit: 150 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Expand/Continue Non-housing Community Dev Sup Srvc	2015	2019	Non-Homeless Special Needs Non-Housing Community Development		Aging Infrastructure and Divestment in Communities	CDBG: \$1,198,360	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
8	Improve & Maintain Water & Sewer Systems	2015	2019	Non-Housing Community Development		Aging Infrastructure and Divestment in Communities	CDBG: \$7,809,175	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 40000 Persons Assisted
9	Foster Economic Development	2015	2019	Non-Housing Community Development		Aging Infrastructure and Divestment in Communities	CDBG: \$3,595,080	Jobs created/retained: 160 Jobs
10	Revitalize Divested Downtown Districts	2015	2019	Non-Housing Community Development		Aging Infrastructure and Divestment in Communities	CDBG: \$3,595,080	Facade treatment/business building rehabilitation: 80 Business
11	Improve and Maintain Community Facilities	2015	2019	Non-Housing Community Development		Aging Infrastructure and Divestment in Communities	CDBG: \$1,677,703	Public service activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted
12	Creation & preservation of aff rental hsg-CDBG DR	2015	2019	Affordable Housing		Limited Housing Opportunities	HOPWA: \$340,000	Tenant-based rental assistance / Rapid Rehousing: 48 Households Assisted Homelessness Prevention: 100 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Creation & preservation of affordable rental hsg
	Goal Description	HOME program plans to reallocate funds within this category to provide for more TBRA assistance. New goal could go from 477 to 700.
2	Goal Name	Creation-Preservation of Affordable Homeownership
	Goal Description	
3	Goal Name	Preserve Short & Long-term Homeless Facilities&HSG
	Goal Description	
4	Goal Name	Preserve Short & Long-term Spc Need Facilities&HSG
	Goal Description	
5	Goal Name	Continue Supportive Srvs-Persons with HIV/AIDS
	Goal Description	
6	Goal Name	Continue Support Srvcs-Homeless Persons
	Goal Description	
7	Goal Name	Expand/Continue Non-housing Community Dev Sup Srvc
	Goal Description	

8	Goal Name	Improve & Maintain Water & Sewer Systems
	Goal Description	
9	Goal Name	Foster Economic Development
	Goal Description	
10	Goal Name	Revitalize Divested Downtown Districts
	Goal Description	
11	Goal Name	Improve and Maintain Community Facilities
	Goal Description	
12	Goal Name	Creation & preservation of aff rental hsg-CDBG DR
	Goal Description	

AP-25 Allocation Priorities – 91.320(d)

Introduction:

The following are the allocation priorities for the State of Iowa by federal funding category.

The actual allocation amount will follow these percentage of funds.

Funding Allocation Priorities

	Creation & preservation of affordable rental hsg (%)	Creation-Preservation of Affordable Homeownership (%)	Preserve Short & Long-term Homeless Facilities&HSG (%)	Preserve Short & Long-term Spc Need Facilities&HSG (%)	Continue Supportive Srvs-Persons with HIV/AIDS (%)	Continue Support Srvcs-Homeless Persons (%)	Expand/Continue Non-housing Community Dev Sup Srvs (%)	Improve & Maintain Water & Sewer Systems (%)	Foster Economic Development (%)	Revitalize Divested Downtown Districts (%)	Improve...
CDBG	0	22	0	0	0	0	1	40	15	15	
HOME	82	18	0	0	0	0	0	0	0	0	
HOPWA	0	0	89	0	11	0	0	0	0	0	
ESG	0	0	0	60	0	40	0	0	0	0	
HTF	100	0	0	0	0	0	0	0	0	0	
Other CDBG-DR	0	0	0	0	0	0	0	0	0	0	

Table 7 – Funding Allocation Priorities

Reason for Allocation Priorities

The State of Iowa’s funding allocation priorities were developed in response to the State’s priority needs, CDBG, HOME, HOPWA, HTF and ESG

past performances and anticipated allocations. Note: These allocation priorities outlined above do not include allocations for program administration for each CPD program.

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

The State, informed by stakeholders input, has identified three overarching priority needs the population will face over the next five years and has developed eleven goals to address those needs. The priority needs are: limited housing opportunities; limited supportive services; limited non-housing supportive services; and aging infrastructure and divestment in communities. Approximately 22% of CDBG funds, 100% of HOME funds, 89% of HOPWA funds, 100% of HTF, and 60% of ESG funds have been allocated to meet the limited housing opportunities priority need by addressing the following goals: creation and preservation of affordable rental housing; preservation of affordable homeownership housing; preservation of short- and long-term homeless facilities and housing; preservation of short- and long-term special needs facilities and housing. Approximately 1% of CDBG funds and 11% of HOPWA funds have been allocated to meet the limited supportive services priority need by addressing the following goals: continue supportive services for persons with HIV/AIDS and expand and continue non-housing community development supportive services. Approximately 40% of ESG funds have been allocated to meet limited supportive services needs by addressing the goal to continue supportive services for homeless persons. The majority of CDBG, 77%, has been allocated to meet the aging infrastructure and divestment in community need which will be addressed through the following goals: improve and maintain water and sewer systems; foster economic development; revitalize downtown districts; and improve and maintain community facilities. The State has identified priority needs, developed goals and allocated funding to ensure the goals are met and the needs are addressed.

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

Introduction:

A method of Distribution has been added by substantial amendment in May 2020 for the programming of CDBG-CV funds.

Distribution Methods

Table 8 - Distribution Methods by State Program

1	State Program Name:	CDBG Community Facilities and Services Fund
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	The Community Facilities Fund offers grants to assist communities for a variety of projects including daycare facilities, senior centers and other projects such as storm water.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Applicants for CDBG funds must meet the following threshold criteria: Show the project addresses at least one of the three national objectives (primarily benefit low- and moderate-income persons, prevent or eliminates slum and blight or alleviate conditions which pose a serious and immediate threat to the health or welfare of a community's residents); Show project funds will be used only for eligible activities; Provide evidence of local capacity to administer grant (past experience with state or federal grants, staff qualifications or plans to contract for grant administration); Show acceptable past performance in administering a CDBG project; Show it is feasible to complete the project with the funds requested; To the greatest extent feasible, CDBG funds are to be used as gap financing. Applications are to identify and describe any other sources of funding for proposed activities; Identify community development and housing needs; Satisfy the Iowa Citizen Participation Plan requirements; and Present signed certifications as required.

<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Applications for CDBG programs can be found on the State’s online grant application platform at https://www.iowagrants.gov/index.do. A tremendous amount of information on applying for and implementing a CDBG funded program, including management guides, presentations and templates, is available at the Iowa Economic Development Authority’s (IEDA’s) website: https://www.iowaeconomicdevelopment.com/Community/downloads.</p> <p>Beginning in 2017 and subsequent applications, the applicants will be required to have: Environmental complete; Site Control demonstrated by either an option on the parcel secured with money (if necessary) or ownership as long as it is purchased prior to the application submittal date; Final architectural plans completed or at least underway (this cost is ineligible for CDBG reimbursement.</p> <p>More competitive storm water applications will have Environmental complete); Final engineering complete or underway (this cost is ineligible for CDBG reimbursement); Working with DNR of IDALS on sustainability storm water project.</p> <p>Effective 2017 traditional storm water projects will be accepted through the Community Facilities Fund. Applications will be accepted once a year.</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>N/A</p>

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>N/A</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>Community facility program applications are selected through a competitive process on an annual basis. The State estimates up to 7% of the annual CDBG allocation will be awarded to community facility projects.</p>

	Describe threshold factors and grant size limits.	The maximum grant award is capped at \$800,000. Communities with population less than 1,000 can receive up to \$300,000; Communities with populations between 1,000 and 2,500 can receive up to \$500,000; Communities with populations between 2,500 and 15,000 can receive up to \$600,000; and Communities with populations greater than 15,000 can receive up to \$800,000.
	What are the outcome measures expected as a result of the method of distribution?	The State anticipates approximately 3 public facility non-housing infrastructure will be funded annually.
2	State Program Name:	CDBG Downtown Revitalization Fund
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	The Downtown Revitalization Fund assists communities in demonstrating innovative, cutting edge solutions to make Iowa's communities more environmentally, economically and culturally viable.

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Applicants for CDBG funds must meet the following threshold criteria: Show the project addresses at least one of the three national objectives (primarily benefit low- and moderate-income persons, prevent or eliminates slum and blight or alleviate conditions which pose a serious and immediate threat to the health or welfare of a community’s residents); Show project funds will be used only for eligible activities; Provide evidence of local capacity to administer grant (past experience with state or federal grants, staff qualifications or plans to contract for grant administration); Show acceptable past performance in administering a CDBG project; Show it is feasible to complete the project with the funds requested; To the greatest extent feasible, CDBG funds are to be used as gap financing. Applications are to identify and describe any other sources of funding for proposed activities; Identify community development and housing needs; Satisfy the Iowa Citizen Participation Plan requirements; and Present signed certifications as required.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Applications for CDBG programs can be found on the State’s online grant application platform at https://www.iowagrants.gov/index.do. A tremendous amount of information on applying for and implementing a CDBG funded program, including management guides, presentations and templates, is available at the Iowa Economic Development Authority’s (IEDA’s) website: https://www.iowaeconomicdevelopment.com/Community/downloads.</p> <p>The following changes to application requirements will be effective as of the 2015 grant cycle. More competitive applications will have: Environmental complete and signed agreement with each business with money down in an escrow account (\$1,000-\$5,000). The following criteria are recommended in applications submitted for 2015 & 2016, the criteria will be required in applications submitted for 2017 and subsequent years. Architect procured with experience with secretary of the interior standards; Cost estimates completed by architect; and Minimum building requirements.</p>

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

<p>Describe how resources will be allocated among funding categories.</p>	<p>Downtown Revitalization fund applications are competitive awarded on an annual basis. The State estimates 15% of the annual CDBG allocation will be awarded to downtown revitalization projects.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>Max grant award is \$500,000</p>

	What are the outcome measures expected as a result of the method of distribution?	The State anticipates assisting approximately 80 businesses will be funded through this program annually.
3	State Program Name:	CDBG Housing Fund
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	The Housing Fund supports owner-occupied rehabilitation for single-family homes being used as the principal residence.

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Applicants for CDBG funds must meet the following threshold criteria: Show the project addresses at least one of the three national objectives (primarily benefit low- and moderate-income persons, prevent or eliminates slum and blight or alleviate conditions which pose a serious and immediate threat to the health or welfare of a community's residents); Show project funds will be used only for eligible activities; Provide evidence of local capacity to administer grant (past experience with state or federal grants, staff qualifications or plans to contract for grant administration); Show acceptable past performance in administering a CDBG project; Show it is feasible to complete the project with the funds requested; Identify community development and housing needs; Satisfy the Iowa Citizen Participation Plan requirements; and Present signed certifications as required.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Applications for CDBG programs can be found on the State's online grant application platform at https://www.iowagrants.gov/index.do. A tremendous amount of information on applying for and implementing a CDBG funded program, including management guides, presentations and templates, is available at the Iowa Economic Development Authority's (IEDA's) website: https://www.iowaeconomicdevelopment.com/Community/downloads.</p> <p>The following are required beginning in 2017 and in subsequent years: Program administrative plans will be completed and approved by the City, grant administrator procured, if necessary. More competitive applications will have: Environmental complete (if awarded this cost is eligible for CDBG reimbursement) and housing rehab applications approved, LMI benefit calculate to be re-checked once final completion of CDBG assisted work is completed.</p>

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

<p>Describe how resources will be allocated among funding categories.</p>	<p>Housing Fund applications are selected through a competitive process on an annual basis. The State estimates up to 22% of the annual CDBG allocation will be awarded to housing affordability projects.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>The maximum grant award is capped at \$38,500 per housing unit</p>

	What are the outcome measures expected as a result of the method of distribution?	The State anticipates assisting approximately 133 homeowners through this program annually.
4	State Program Name:	CDBG Job Creation, Retention, and Enhancement Fund (EDSA)
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	The Job Creation, Retention & Enhancement Fund assists businesses that create new jobs through the Economic Development Set-Aside (EDSA) and provides industry driven training assistance to the underemployed and working poor through Career Link. EDSA provides direct and forgivable loans to encourage business start up, expansion, and/or capital investment. Manufacturing businesses are preferred, but other types of businesses are assisted as well. Career Link is designed to provide targeted job training meeting the needs of businesses and workers. In 2019, IEDA will complete a pilot for microenterprise assistance under the state’s Job Creation, Retention and Enhancement Fund.

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Applicants for CDBG funds must meet the following threshold criteria: Show the project addresses at least one of the three national objectives (primarily benefit low- and moderate-income persons, prevent or eliminates slum and blight or alleviate conditions which pose a serious and immediate threat to the health or welfare of a community’s residents); Show project funds will be used only for eligible activities; Provide evidence of local capacity to administer grant (past experience with state or federal grants, staff qualifications or plans to contract for grant administration); Show acceptable past performance in administering a CDBG project; Show it is feasible to complete the project with the funds requested; To the greatest extent feasible, CDBG funds are to be used as gap financing. Applications are to identify and describe any other sources of funding for proposed activities; Identify community development and housing needs; Satisfy the Iowa Citizen Participation Plan requirements; and Present signed certifications as required.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Applications for CDBG programs can be found on the State’s online grant application platform at https://www.iowagrants.gov/index.do. A tremendous amount of information on applying for and implementing a CDBG funded program, including management guides, presentations and templates, is available at the Iowa Economic Development Authority’s (IEDA’s) website: https://www.iowaeconomicdevelopment.com/Community/downloads.</p>

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

<p>Describe how resources will be allocated among funding categories.</p>	<p>EDSA accepts rolling applications and the award process is competitive. The State estimates that up to 15% of the CDBG allocation will be awarded to job creation and/or retention projects. Only cities and towns are eligible to apply for Career Link funds.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>There is a ceiling of \$1,000,000 per project. There are no thresholds for Career Link applications for job training projects. Supportive services/employment transportation projects have a cap of \$150,000 per project.</p>

	What are the outcome measures expected as a result of the method of distribution?	The State anticipates creating and/or retaining approximately 160 jobs annually.
5	State Program Name:	CDBG Opportunities, Threats, & Sustainability Fund
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	<p>The Opportunities, Threats & Sustainability Fund assists communities that are facing an imminent threat to public health, safety or welfare that requires immediate assistance and to cities and communities that see an opportunity to demonstrate sustainable community activities.</p> <p>Like in 2018, in 2019 IEDA will consider pilot projects under the Opportunities and Threats fund: upper story housing redevelopment, housing acquisition & rehabilitation/ reconstruction, and greenway development to assist with stormwater management.</p>

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Applicants for CDBG funds must meet the following threshold criteria: Show the project addresses at least one of the three national objectives (primarily benefit low- and moderate-income persons, prevent or eliminates slum and blight or alleviate conditions which pose a serious and immediate threat to the health or welfare of a community's residents); Show project funds will be used only for eligible activities; Provide evidence of local capacity to administer grant (past experience with state or federal grants, staff qualifications or plans to contract for grant administration); Show acceptable past performance in administering a CDBG project; Show it is feasible to complete the project with the funds requested; To the greatest extent feasible, CDBG funds are to be used as gap financing. Applications are to identify and describe any other sources of funding for proposed activities; Identify community development and housing needs; Satisfy the Iowa Citizen Participation Plan requirements; and Present signed certifications as required.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Applications for CDBG programs can be found on the State's online grant application platform at https://www.iowagrants.gov/index.do. A tremendous amount of information on applying for and implementing a CDBG funded program, including management guides, presentations and templates, is available at the Iowa Economic Development Authority's (IEDA's) website: https://www.iowaeconomicdevelopment.com/Community/downloads.</p> <p>The following changes to application requirements will be effective as of the 2017 grant cycle. Sustainable storm water project will only be funded if co-sponsored by DNR or with IDALS involvement. These will have an open application cycle.</p>

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

<p>Describe how resources will be allocated among funding categories.</p>	<p>The State estimates up to 5% of the annual CDBG allocation will be awarded to projects, which respond to opportunities, threats or sustainability.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>Determined on a per project basis.</p>

	What are the outcome measures expected as a result of the method of distribution?	The State anticipates funding approximately 100 persons served.
6	State Program Name:	CDBG Water & Sewer Fund
	Funding Sources:	CDBG
	Describe the state program addressed by the Method of Distribution.	The Water/Sewer Fund assist cities and counties with sanitary and water system improvements, water and wastewater treatment facilities, and storm sewer projects related to sanitary improvements and rural water connections

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Applicants for CDBG funds must meet the following threshold criteria: Show the project addresses at least one of the three national objectives (primarily benefit low- and moderate-income persons, prevent or eliminates slum and blight or alleviate conditions which pose a serious and immediate threat to the health or welfare of a community’s residents); Show project funds will be used only for eligible activities; Provide evidence of local capacity to administer grant (past experience with state or federal grants, staff qualifications or plans to contract for grant administration); Show acceptable past performance in administering a CDBG project; Show it is feasible to complete the project with the funds requested; To the greatest extent feasible, CDBG funds are to be used as gap financing. Applications are to identify and describe any other sources of funding for proposed activities; Identify community development and housing needs; Satisfy the Iowa Citizen Participation Plan requirements; and Present signed certifications as required.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Applications for CDBG programs can be found on the State’s online grant application platform at https://www.iowagrants.gov/index.do. A tremendous amount of information on applying for and implementing a CDBG funded program, including management guides, presentations and templates, is available at the Iowa Economic Development Authority’s (IEDA’s) website: https://www.iowaeconomicdevelopment.com/Community/downloads.</p> <p>The following changes to application requirements will be effective in 2017 and in subsequent years: Project must have an approved facility plan from the Iowa DNR or approved preliminary engineering plan, if applicable; application must include documentation of local match including USDA-RD letter of conditions or documentation that project is on the state’s Intended Use Plan (IUP).</p> <p>More competitive applications will have completed environmental review; completed final engineering and/ or have been issued construction permits.</p> <p>Applications will be accepted and reviewed on a quarterly basis. Deadlines will be Jan. 1, March 31, July 1, and Oct. 1; A maximum of 25 applications will be accepted each quarter; An equal amount of money will be available each quarter. If money is not spent in one quarter it will roll over to the next. Unsuccessful applicants may resubmit applications in the next quarter.</p>

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

<p>Describe how resources will be allocated among funding categories.</p>	<p>Water/Sewer fund applications are competitive awarded on an annual basis. The State will be transitioning to quarterly awards in program year 2017. The State estimates 38% of the annual CDBG allocation will be awarded to water and sewer projects.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>The maximum grant award is capped at \$800,000. Communities with population less than 30,000 are limited to \$1,000 per capita; Communities with populations between 1,000 and 2,500 can receive up to \$500,000; Communities with populations between 2,500 and 15,000 can receive up to \$600,000; and Communities with populations greater than 15,000 can receive up to \$800,000.</p>

	<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>The State anticipates funding over 20 public facility or non-housing infrastructure projects annually.</p>
7	<p>State Program Name:</p>	<p>CDBG-CV</p>
	<p>Funding Sources:</p>	<p>CARES Act</p>
	<p>Describe the state program addressed by the Method of Distribution.</p>	<p>Program to prevent, prepare for, and respond to the Coronavirus. The state received two funding allocations. One in April of 2020 in the amount of \$14,617,483 that will be primarily used for public service activities. The second allocation in May 2020 in the amount of \$9,506,040 which is targeted at low-income elderly and needy children, housing market disruptions, and reducing virus transmission and can be utilized in entitlement areas.</p>

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p>	<p>Applicants for CDBG funds must meet the following threshold criteria: Show the project addresses is either primarily benefit low- and moderate-income persons or urgent need which pose a serious and immediate threat to the health or welfare of a community's residents; Show project funds will be used only for eligible activities; Provide evidence of local capacity to administer grant (past experience with state or federal grants, staff qualifications or plans to contract for grant administration); Show it is feasible to complete the project with the funds requested; Identify community development and housing needs; Satisfy the Iowa Citizen Participation Plan requirements; and Present signed certifications as required.</p> <p>For the second allocation that can be used in entitlement areas, the state will work with the entitlement cities to determine the amount and distribution method of these additional funds to their Cities. The entire allocation or a portion will be utilized in the entitlement areas. All funds distributed will be to prevent, prepare for, and respond to the Coronavirus with an emphasis on targeting at low-income elderly and needy children, housing market disruptions, and reducing virus transmission.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Application materials and review criteria will be on the IEDA website: https://www.iowaeconomicdevelopment.com/Community</p> <p>Applications for CDBG programs can be found on the State's online grant application platform at https://www.iowagrants.gov/index.do. A tremendous amount of information on applying for and implementing a CDBG funded program, including management guides, presentations and templates, is available at the Iowa Economic Development Authority's (IEDA's) website: https://www.iowaeconomicdevelopment.com/Community/downloads.</p>

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

<p>Describe how resources will be allocated among funding categories.</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p>	<p>Applications will be an open window and awarded on a first come basis until funds are spent as long as they meet threshold criteria, is an eligible activity, meets a national objective, and is a public service or micro enterprise activity.</p> <p>The State estimates 100% of the CDBG-CV allocation will be awarded to public service projects for the first allocation and most of the second allocation.</p> <p>For the second allocation that can be used in entitlement areas, the state will work with the entitlement cities to determine the amount and distribution method of these additional funds to their Cities. The entire allocation or a portion will be utilized in the entitlement areas. All funds distributed will be to prevent, prepare for, and respond to the Coronavirus with an emphasis on targeting at low-income elderly and needy children, housing market disruptions, and reducing virus transmission.</p>
<p>Describe threshold factors and grant size limits.</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p>	<p>Must be a new or expanded service unless HUD grants a waiver to this requirement. Must not be in an entitlement community. Must be to prevent, prepare for, and respond to Coronavirus.</p> <p>Grant size limit will be \$500,000 for non-entitlement cities and entitlement allocations will be based on population.</p> <p>For the second allocation that can be used in entitlement areas, the state will work with the entitlement cities to determine the amount and distribution method of these additional funds to their Cities. The entire allocation or a portion will be utilized in the entitlement areas. All funds distributed will be to prevent, prepare for, and respond to the Coronavirus with an emphasis on targeting at low-income elderly and needy children, housing market disruptions, and reducing virus transmission.</p>

	<p>What are the outcome measures expected as a result of the method of distribution?</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p>	<p>The State anticipates assisting over 250,000 persons including entitlement cities.</p>
8	<p>State Program Name:</p>	<p>Emergency Solutions Grant (ESG) Program</p>
	<p>Funding Sources:</p>	<p>ESG</p>
	<p>Describe the state program addressed by the Method of Distribution.</p>	<p>The ESG program is designed to assist people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.</p>

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>ESG applications are evaluated on a competitive basis, with current criteria as follows: project design, experience and capacity, community partnerships, performance, budget and grants management. IFA evaluates the needs and competition structure each year to ensure the dollars are following the need.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>N/A</p>

<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>IFA is the State ESG grantee. IFA works closely with the Iowa Council on Homelessness, the decision making body for the Balance of State Continuum of Care, to plan ESG allocations. IFA awards ESG funds on a competitive basis. Applications are accepted via an online platform annually. Agencies throughout the State may apply for ESG funds. Eligible applicants include units of general local government and nonprofit service agencies.</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>N/A</p>

<p>Describe how resources will be allocated among funding categories.</p>	<p>Agencies were eligible to apply for assistance in various funding categories, up to a total application amount of \$200,000 each. Within that overall limit, various funding categories also had individual limits. They included: Rapid Rehousing: \$150,000 if serving the general population or \$75,000 if services limited to a specific subpopulation (such as youth, DV, etc.); Homelessness Prevention: \$50,000 for general population or \$25,000 for a specific subpopulation; Street Outreach: \$50,000 for general population or \$25,000 for a specific subpopulation; Shelter: a calculation based on beds available and bed nights provided, up to \$200,000.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>Grant awards for the 2019 calendar year may range from a minimum of \$20,000 to a maximum of \$200,000. IFA regularly evaluates the needs of the program and determines the maximum and minimum awards. For 2019, minimum and maximum awards were based on how many shelter beds an agency offered, its past bed utilization rates, population served (general population or specialized population), number of counties served (for Rapid Rehousing, Homelessness Prevention, and Street Outreach), and other factors.</p>

	What are the outcome measures expected as a result of the method of distribution?	Expected outcomes are to provide assistance to those that are experiencing a housing crisis and/or homelessness, and that to the extent possible, a baseline of at least Shelter and Rapid Rehousing will be available throughout the state, to those that are most in need. We anticipate that approximately 6,700 persons will be served with ESG & HOPWA funds in Iowa.
9	State Program Name:	HOME Homebuyer
	Funding Sources:	HOME
	Describe the state program addressed by the Method of Distribution.	The Homebuyer program funds down payment and rehabilitation assistance programs administered by eligible nonprofits and governmental entities which in turn distribute funds to individual home buyers based on rules or guidelines developed by the administrator.

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>In competitive rounds, HOME Homebuyer Assistance projects are evaluated and awarded points in several categories. Last round, IFA used the following categories: match, Great Places, Home Base Iowa Community, underserved and capacity.</p> <p>Match-The total amount of funding designated as and approved by IFA divided by the total amount of HOME funds requested.</p> <p>Great Places-Points awarded if the project is located entirely in a Great Place and required form is provided to IFA.</p> <p>Home Base Iowa Communities - Points awarded if the application shows that the project is located entirely in a Home Base Iowa Community. Home Base Iowa Communities have committed to rolling out the red carpet and welcoming military members and their families leaving the service to becoming Iowans. Home Base Iowa Communities initiative designates communities as centers of opportunity for military veterans and further highlights Iowa’s statewide commitment to welcoming veterans to the state. Iowa has a great story to share nationwide, regularly ranking high on lists naming Iowa as a great place to live, work, play and raise a family.</p> <p>Underserved – Points awarded if the entire project is not located in cities that had completed HOME Homebuyer units in a designated timeframe.</p> <p>Capacity - Points awarded based on IFA’s review of the organization submitting the application.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>N/A</p>

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

<p>Describe how resources will be allocated among funding categories.</p>	<p>Resources for Homebuyer applications are normally allocated annually on a competitive basis. IFA allocates HOME funds to homebuyer, rental and tenant-based rental assistance projects based on need and availability of funds.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>IFA State administrative rules limits the homebuyer grants to \$600,000 for each contract. The most important threshold criteria is the capacity of the entity to fulfill the requirements of the HOME program. Each funding round rules are established at IFA's website http://www.iowafinanceauthority.gov/.</p>

	What are the outcome measures expected as a result of the method of distribution?	IFA estimates that 0 households will be served.
10	State Program Name:	HOME Rental
	Funding Sources:	HOME
	Describe the state program addressed by the Method of Distribution.	The Rental program makes low-interest loans available to developers of affordable single-family and multifamily housing developments

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>N/A</p>

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

<p>Describe how resources will be allocated among funding categories.</p>	<p>Resources for Rental applications are normally allocated annually on a competitive basis. IFA allocates HOME funds to homebuyer, rental and tenant-based rental assistance projects based on need and availability of funds</p>
<p>Describe threshold factors and grant size limits.</p>	<p>The most important threshold criteria is the capacity of the entity to fulfill the requirements of the HOME program. Each funding round rules are established at IFA's website http://www.iowafinanceauthority.gov/.</p>

	What are the outcome measures expected as a result of the method of distribution?	IFA estimates that 6 rental units will be acquired, developed or rehabilitated.
11	State Program Name:	HOME Tenant-Based Rental Assistance
	Funding Sources:	HOME
	Describe the state program addressed by the Method of Distribution.	The Tenant-Based Rental Assistance program assists individual households to afford market-rate rental units by providing housing costs such as rent, security deposits and/or utility deposits.

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>In competitive rounds, HOME TBRA projects are evaluated and are also awarded points in several categories. Last round, IFA awarded points in the following categories: match, targeted populations, Great Places, Home Base Iowa Community, 85% Rent Subsidy and capacity.</p> <p>Match-The total amount of funding designated as and approved by IFA divided by the total amount of HOME funds requested.</p> <p>Targeted Populations-Points awarded for projects targeting one of the populations below: homeless persons, including homeless individuals, families, youth and/or veterans; persons with HIV/AIDS; persons with disabilities; persons with substance abuse addiction; transitional housing; victims of domestic violence.</p> <p>Great Places-Points awarded if the project is located entirely in a Great Place and required form is provided to IFA.</p> <p>Home Base Iowa Communities - Points awarded if the application shows that the project is located entirely in a Home Base Iowa community. Home Base Iowa Communities who have committed to rolling out the red carpet and welcoming military members and their families leaving the service to becoming Iowans. Home Base Iowa Communities initiative designates communities as centers of opportunity for military veterans and further highlights Iowa’s statewide commitment to welcoming veterans to the state. Iowa has a great story to share nationwide, regularly ranking high on lists naming Iowa as a great place to live, work, play and raise a family.</p> <p>85% HOME Rent Subsidy - Points awarded if 85% or more of the clients served by the project receive ongoing HOME rent subsidies.</p> <p>Capacity-Points awarded based on IFA’s review of the capacity of the organization submitting the application</p>
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<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>N/A</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>N/A</p>

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>N/A</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>Resources for TBRA applications are normally allocated annually on a competitive basis. IFA allocates HOME funds to homebuyer, rental and tenant-based rental assistance projects based on need and availability of funds</p>

	Describe threshold factors and grant size limits.	The most important threshold criteria is the capacity of the entity to fulfill the requirements of the HOME program. Each funding round rules are established at IFA's website http://www.iowafinanceauthority.gov/ .
	What are the outcome measures expected as a result of the method of distribution?	IFA estimates that 477 households will be assisted by TBRA
12	State Program Name:	Housing Opportunities for Persons with AIDS (HOPWA)
	Funding Sources:	HOPWA
	Describe the state program addressed by the Method of Distribution.	The HOPWA program in Iowa assists persons who have been diagnosed with HIV/AIDS and their families who are at risk of homelessness.

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>IFA currently partners with five project sponsors that together cover the entire state. Sponsors are monitored regularly to ensure they meet HOPWA requirements. Occasionally a switch in sponsors is needed, or an additional sponsor may be sought. This is based on community need and in consultation with the existing provider network.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>N/A</p>

<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>N/A</p>
<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>IFA currently works with five project sponsors that together provide services to all areas of the State. In the event that a project sponsor is no longer able or willing to provide HOPWA services, IFA issues a Request for Information from interested new partners. Selection criteria include the following:</p> <ul style="list-style-type: none"> • Experience providing services to persons living with HIV/AIDS and their families, including through Ryan White programs. • Experience providing housing services to low-income persons. • Experience administering federal programs. • Experience with data collection and outcomes reporting. • Financial management history and capability. • Personnel qualifications. • Relevant community partnerships.

<p>Describe how resources will be allocated among funding categories.</p>	<p>Funding categories include Tenant Based Rental Assistance (TBRA), Short-Term Rent/Mortgage/Utilities Assistance (STRMU), Permanent Housing Placement, Supportive Services, Housing Information Services, and Administration. Sponsors submit budget requests in the various categories based on regional needs, including the current number of clients receiving TBRA assistance, the number of clients that received STRMU in the previous year and the amounts spent, and a review of unmet needs from the previous year. Funding is prioritized first to ensure that TBRA subsidies are continued for current clients.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>Funds are allocated based on a formula utilizing the current number of HIV/AIDS diagnoses per county. For example, if one region contains 30% of the HIV/AIDS diagnoses, that region would receive 30% of the available funding. Sponsors are monitored regularly to ensure they continue to meet threshold grant requirements, including compliance with program regulations, financial management, and data reporting.</p>

	What are the outcome measures expected as a result of the method of distribution?	The State anticipates assisting approximately 148 households through this program annually. This includes approximately 48 households assisted through TBRA and 100 households through STRMU, with additional assistance for Permanent Housing Placement and Supportive Services.
13	State Program Name:	Housing Trust Fund
	Funding Sources:	HTF
	Describe the state program addressed by the Method of Distribution.	The Rental program makes conditional grants available to developers of affordable multifamily housing developments

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>Applications will be evaluated and awarded points in several categories, if demand exceeds availability of funds categories include: targeted populations, Great Places, Home Base Iowa community, fully accessible units, utilization of project-based rental subsidy, Opportunity Areas, leverage, and flexible tenant selection plans.</p> <p>Targeted Populations - Points awarded for projects targeting one of the following populations: Homeless persons, including homeless individuals, families, youth and/or veterans; Persons with HIV/AIDS; Persons with disabilities; Persons with Substance Addiction Disorders; Survivors of Domestic Violence</p> <p>Great Places - IFA shall consult with the Department of Cultural Affairs to determine if a Project is within a jurisdiction that has been designated by the Iowa Great Places Board for participation in the program within the last three years, pursuant to Section 303.3C, subsection 4 of the Iowa Code.</p> <p>Home Base Iowa Community - Projects located within the jurisdiction of a current Home Base Iowa Community are eligible for points in this category.</p> <p>Fully Accessible Units - Twenty-five percent (25%) of the HTF-assisted units must be fully accessible (not adaptable) as shown in the plans submitted with the application.</p> <p>Utilization of Project-Based Assistance - Projects that have Federal Project-Based Rental Assistance, HUD-VASH Voucher Assistance or Local Project-Based PHA (Public Housing Authority) Voucher Assistance</p> <p>Opportunity Areas - Projects located in a census tract that is identified as a High or Very High Opportunity area as shown in the Application Package.</p> <p>Leverage - The total amount of local, non-federal funds designated as leverage (as approved by IFA) will be divided by the amount of total HTF funds requested.</p> <p>Flexible Tenant Selection Criteria - IFA will give preference in funding decisions to applicants who intend to create units for individuals or families who face multiple barriers to securing permanent housing. Multiple barriers may include poor credit, prior evictions, past criminal convictions, poor rental history, and multiple shelter placements</p>
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<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>N/A</p>
<p>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</p>	<p>N/A</p>

<p>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</p>	<p>N/A</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>IFA HTF applications will be awarded on a competitive basis. The State estimates 90% of the annual HTF allocation will be awarded to developers of affordable multifamily housing.</p>

<p>Describe threshold factors and grant size limits.</p>	<p>The most important threshold criterion is the capacity of the entity to fulfill the requirements of the HTF program. Each funding round rules are established at IFA's website http://www.iowafinanceauthority.gov/. No grant size limit has been established</p>
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>IFA estimates that 24 HTF units will be acquired, developed or rehabilitated.</p>

Discussion:

AP-35 Projects – (Optional)

Introduction:

IEDA is entering the CDBG-CV funding as one project called CDBG-CV (2020). IFA has entered ESG-CV as one project called ESG20 Iowa. IFA has entered HOPWA-CV as one project called HOPWA20 Iowa.

IEDA is entering our projects with our action plan because they mirror our method of distribution.

HOME & NHTF projects have been entered.

#	Project Name
1	CDBG Opportunity, Threats, and Sustainability
2	CDBG Housing
3	CDBG Water & Sewer
4	CDBG Economic Development
5	CDBG Downtown Revitalization
6	CDBG Community Facilities and Services
7	CDBG Technical Assistance
8	HOME STATE PA 2019
9	HOME STATE ADMIN 2019 (2019)
10	NHTF STATE ADMIN 2018
11	HABITAT FOR HUMANITY OF IOWA'S HOME DOWNPAYMENT ASSISTANCE PROGRAM - HM
12	HFHMCI HOMEBUYER ASSISTANCE - HM
13	REGION XII MANNING - HM
14	SIMPCO 2018 HOE DPA & REHAB - HM
15	REGION XII JEFFERSON - HM
16	HOME, INC. SINGLE FAMILIES RENTAL - HM
17	NORTH STONE APARTMENTS PHASE 2 - HM
18	CLINTON HOUSING AUTHORITY - HM
19	FORT DODGE HOUSING AGENCY SECURITY/UTILITY DEPOSIT ASSISTANCE - HM
20	RADH #3 - HM
21	FAMILY HOUSING ASSISTANCE PROGRAM VI - HM
22	EASTERN IOWA REGIONAL HOUSING CORPORATION - HM
23	TBRA HOMELESS ASSISTANCE PROGRAM - HM
24	IOWA COMMUNITY ACTION CORPORATION - HM
25	UERPC HOMEBUYER ASSISTANCE-CITY OF MONONA - HM
26	SUMMIT CENTER - HM

#	Project Name
27	GRANT FOR THE BENEFIT OF HOMELESS INDIVIDUALS - HM
28	SOUTHWEST IOWA FIRST TIME HMBYR OPPORTUNITY - HM
29	GDM HABITAT AFFORDABLE HOMEOWNERSHIP - HM
30	CENTRAL IOWA SHELTER SERVICES PHASE II - HTF
32	ESG20 Iowa
33	HOPWA20 Iowa
34	CDBG-CV (2020)

Table 9 – Project Information

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

Allocation priorities for CDBG are aligned with our method of distribution. The obstacles to addressing underserved needs are not enough CDBG grant resources to award all qualified applicants.

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG Opportunity, Threats, and Sustainability
	Target Area	
	Goals Supported	Improve & Maintain Water & Sewer Systems Foster Economic Development Revitalize Divested Downtown Districts Improve and Maintain Community Facilities
	Needs Addressed	Aging Infrastructure and Divestment in Communities
	Funding	:
	Description	Financial assistance to communities that are facing an imminent threat to public health, safety or welfare and to cities that see an opportunity to demonstrate a sustainable community activity.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Financial assistance to communities that are facing an imminent threat to public health, safety or welfare and to cities that see an opportunity to demonstrate a sustainable community activity.
2	Project Name	CDBG Housing
	Target Area	
	Goals Supported	Creation-Preservation of Affordable Homeownership
	Needs Addressed	Limited Housing Opportunities
	Funding	:
	Description	CDBG Owner-Occupied Housing Rehabilitation
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Approximately 133 units of owner-occupied housing will be rehabilitated for low-to moderate income families
3	Project Name	CDBG Water & Sewer
	Target Area	
	Goals Supported	Improve & Maintain Water & Sewer Systems
	Needs Addressed	Aging Infrastructure and Divestment in Communities
	Funding	:
	Description	Water & Sewer Infrastructure Projects
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Approximately, 26 Low-to moderate income communities (approximately 40,000) will receive assistance to improve either their water or sewer system infrastructure.
4	Project Name	CDBG Economic Development
	Target Area	
	Goals Supported	Foster Economic Development
	Needs Addressed	Aging Infrastructure and Divestment in Communities
	Funding	:
	Description	Financial assistance to communities to assist businesses create or retain Low to moderate jobs
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Approximately 160 jobs created for low to moderate income persons.
5	Project Name	CDBG Downtown Revitalization
	Target Area	
	Goals Supported	Revitalize Divested Downtown Districts
	Needs Addressed	Aging Infrastructure and Divestment in Communities
	Funding	:
	Description	Provide financial assistance to communities to complete facade restoration in their business districts.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Approximately 8 communities (80 businesses) will be assisted with funds to revitalize downtowns with facade improvements
6	Project Name	CDBG Community Facilities and Services
	Target Area	
	Goals Supported	Improve and Maintain Community Facilities
	Needs Addressed	Aging Infrastructure and Divestment in Communities
	Funding	:
	Description	Rehabilitate or develop public and community facilities that serve low-to moderate residents.
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Approximately 3 communities will receive assistance to develop or rehabilitate public facilities for low-to moderate residents.
7	Project Name	CDBG Technical Assistance
	Target Area	
	Goals Supported	Creation-Preservation of Affordable Homeownership Improve & Maintain Water & Sewer Systems Foster Economic Development Revitalize Divested Downtown Districts Improve and Maintain Community Facilities
	Needs Addressed	Limited Housing Opportunities Aging Infrastructure and Divestment in Communities
	Funding	:
	Description	training to assist communities in completing CDBG applications or build capacity
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	training to assist communities in completing CDBG applications or build capacity
	8	Project Name
Target Area		
Goals Supported		Creation & preservation of affordable rental hsg Creation-Preservation of Affordable Homeownership
Needs Addressed		Limited Housing Opportunities
Funding		HOME: \$185,544

	Description	2019 PA Subfund (Amount of PA received at 8/19/2019 when the amended Annual Action Plan was completed is \$185,543.27 rounded up to \$185,544. It is noted that this amount will increase some between now and 12/31/2019.)
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	These are program income admin funds that can be used to pay agency admin fees or eligible project admin fees.
	Location Description	HOME Program Administrator: Iowa Finance Authority, 1963 Bell Ave, Suite 200, Des Moines, IA 50315 Project Administration Funds: Projects located in various cities throughout Iowa.
	Planned Activities	
9	Project Name	HOME STATE ADMIN 2019 (2019)
	Target Area	
	Goals Supported	Creation & preservation of affordable rental hsg Creation-Preservation of Affordable Homeownership
	Needs Addressed	Limited Housing Opportunities
	Funding	HOME: \$708,810
	Description	2019 Admin Funds
	Target Date	8/19/2023
	Estimate the number and type of families that will benefit from the proposed activities	These are admin funds that can be used to pay agency admin fees or eligible project admin fees.
	Location Description	HOME Program Administrator: Iowa Finance Authority, 1963 Bell Avenue, Suite 200, Des Moines, IA 50315 Project Administration Funds: Projects located in various cities throughout Iowa.
	Planned Activities	
10	Project Name	NHTF STATE ADMIN 2018
	Target Area	
	Goals Supported	Creation & preservation of affordable rental hsg

	Needs Addressed	Limited Housing Opportunities
	Funding	HTF: \$300,000
	Description	2018 NHTF Admin Funds
	Target Date	8/19/2023
	Estimate the number and type of families that will benefit from the proposed activities	Funds are used to pay agency administration costs.
	Location Description	HTF Program Administrator: Iowa Finance Authority, 1963 Bell Ave, Suite 200, Des Moines, IA 50315
	Planned Activities	
11	Project Name	HABITAT FOR HUMANITY OF IOWA'S HOME DOWNPAYMENT ASSISTANCE PROGRAM - HM
	Target Area	
	Goals Supported	Creation-Preservation of Affordable Homeownership
	Needs Addressed	Limited Housing Opportunities
	Funding	:
	Description	Homebuyer - Acquisition
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	12, Family
	Location Description	Statewide
	Planned Activities	Acquisition
12	Project Name	HFHMC I HOMEBUYER ASSISTANCE - HM
	Target Area	
	Goals Supported	Creation-Preservation of Affordable Homeownership
	Needs Addressed	Limited Housing Opportunities
	Funding	:
	Description	Homebuyer - Acquisition and Rehabilitation

	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	4, Family
	Location Description	Various cities in Marion County
	Planned Activities	Acquisition/Rehabilitation
13	Project Name	REGION XII MANNING - HM
	Target Area	
	Goals Supported	Creation-Preservation of Affordable Homeownership
	Needs Addressed	Limited Housing Opportunities
	Funding	:
	Description	Homebuyer - Acquisition and Rehabilitation
	Target Date	4/1/2019
	Estimate the number and type of families that will benefit from the proposed activities	5, Family
	Location Description	Manning, Iowa
	Planned Activities	Acquisition/Rehabilitation
14	Project Name	SIMPCO 2018 HOE DPA & REHAB - HM
	Target Area	
	Goals Supported	Creation-Preservation of Affordable Homeownership
	Needs Addressed	Limited Housing Opportunities
	Funding	:
	Description	Homebuyer - Acquisition and Rehabilitation
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	10, Family
	Location Description	Various cities in these counties: Cherokee, IDA, Monona, Plymouth, Woodbury

	Planned Activities	Acquisition/Rehabilitation
15	Project Name	REGION XII JEFFERSON - HM
	Target Area	
	Goals Supported	Creation-Preservation of Affordable Homeownership
	Needs Addressed	Limited Housing Opportunities
	Funding	:
	Description	Homebuyer - Acquisition and Rehabilitation
	Target Date	4/1/2021
	Estimate the number and type of families that will benefit from the proposed activities	4, Family
	Location Description	Jefferson, Iowa
	Planned Activities	Acquisition/Rehabilitation
16	Project Name	HOME, INC. SINGLE FAMILIES RENTAL - HM
	Target Area	
	Goals Supported	Creation & preservation of affordable rental hsg
	Needs Addressed	Limited Housing Opportunities
	Funding	:
	Description	Rental - New Construction
	Target Date	8/19/2021
	Estimate the number and type of families that will benefit from the proposed activities	2, Family
	Location Description	Des Moines, IA
	Planned Activities	Rental-New Construction
17	Project Name	NORTH STONE APARTMENTS PHASE 2 - HM
	Target Area	
	Goals Supported	Creation & preservation of affordable rental hsg
	Needs Addressed	Limited Housing Opportunities
	Funding	:

	Description	Rental - New Construction
	Target Date	8/19/2021
	Estimate the number and type of families that will benefit from the proposed activities	6, Family
	Location Description	Winterset, Iowa
	Planned Activities	Rental-new construction
18	Project Name	CLINTON HOUSING AUTHORITY - HM
	Target Area	
	Goals Supported	Creation & preservation of affordable rental hsg
	Needs Addressed	Limited Housing Opportunities
	Funding	:
	Description	Tenant-Based Rental Assistance TBRA
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	200, Family
	Location Description	Camanche & Clinton, Iowa
	Planned Activities	Tenant-based rental assistance
19	Project Name	FORT DODGE HOUSING AGENCY SECURITY/UTILITY DEPOSIT ASSISTANCE - HM
	Target Area	
	Goals Supported	Creation & preservation of affordable rental hsg
	Needs Addressed	Limited Housing Opportunities
	Funding	:
	Description	Tenant-Based Rental Assistance TBRA
	Target Date	3/21/2021
	Estimate the number and type of families that will benefit from the proposed activities	390, Family, Targeted Population-Homeless persons including homeless individuals, families, youth and/or veterans

	Location Description	Multiple cities in these counties: Calhoun, Hamilton, Humboldt, Pocahontas, Webster, Wright
	Planned Activities	Tenant-based rental assistance
20	Project Name	RADH #3 - HM
	Target Area	
	Goals Supported	Creation & preservation of affordable rental hsg
	Needs Addressed	Limited Housing Opportunities
	Funding	:
	Description	Tenant-Based Rental Assistance TBRA
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	130, Family, Targeted Population: Persons with Disabilities
	Location Description	Cedar Rapids, Davenport & Dubuque, Iowa
	Planned Activities	Tenant-based rental assistance
	21	Project Name
Target Area		
Goals Supported		Creation & preservation of affordable rental hsg
Needs Addressed		Limited Housing Opportunities
Funding		:
Description		Tenant-Based Rental Assistance TBRA
Target Date		3/31/2021
Estimate the number and type of families that will benefit from the proposed activities		15, Family, Targeted Population: Homeless persons, including homeless individuals, families, youth and/or veterans
Location Description		Johnston, Urbandale, West Des Moines, and Windsor Heights, Iowa
Planned Activities		Tenant-based rental assistance
22	Project Name	EASTERN IOWA REGIONAL HOUSING CORPORATION - HM
	Target Area	

	Goals Supported	Creation & preservation of affordable rental hsg
	Needs Addressed	Limited Housing Opportunities
	Funding	:
	Description	Tenant-Based Rental Assistance TBRA
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	135, Family, Targeted Population: Persons with Disabilities
	Location Description	Various cities in these counties: Cedar, Clinton, Delaware, Dubuque, Jackson, Jones, Scott
	Planned Activities	Tenant-based rental assistance
23	Project Name	TBRA HOMELESS ASSISTANCE PROGRAM - HM
	Target Area	
	Goals Supported	Creation & preservation of affordable rental hsg
	Needs Addressed	Limited Housing Opportunities
	Funding	:
	Description	Tenant-Based Rental Assistance TBRA
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	35, Family, Targeted Population: Homeless persons, including homeless individuals, families, youth and/or veterans
	Location Description	Ames, Des Moines, & Marshalltown, Iowa
	Planned Activities	Tenant-based rental assistance
24	Project Name	IOWA COMMUNITY ACTION CORPORATION - HM
	Target Area	
	Goals Supported	Creation & preservation of affordable rental hsg
	Needs Addressed	Limited Housing Opportunities
	Funding	:
	Description	Tenant-Based Rental Assistance
	Target Date	6/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	112, Family
	Location Description	Statewide
	Planned Activities	Tenant-based rental assistance
25	Project Name	UERPC HOMEBUYER ASSISTANCE-CITY OF MONONA - HM
	Target Area	
	Goals Supported	Creation-Preservation of Affordable Homeownership
	Needs Addressed	Limited Housing Opportunities
	Funding	:
	Description	Homebuyer-Acq/Rehab
	Target Date	8/19/2021
	Estimate the number and type of families that will benefit from the proposed activities	5, Family
	Location Description	Monona, Iowa
	Planned Activities	Acquisition/Rehabilitation
26	Project Name	SUMMIT CENTER - HM
	Target Area	
	Goals Supported	Creation & preservation of affordable rental hsg
	Needs Addressed	Limited Housing Opportunities
	Funding	:
	Description	Rental-Rehab
	Target Date	8/19/2021
	Estimate the number and type of families that will benefit from the proposed activities	6, Family
	Location Description	Bancroft, Iowa
	Planned Activities	Rental-Rehabilitation

27	Project Name	GRANT FOR THE BENEFIT OF HOMELESS INDIVIDUALS - HM
	Target Area	
	Goals Supported	Creation & preservation of affordable rental hsg
	Needs Addressed	Limited Housing Opportunities
	Funding	:
	Description	TBRA
	Target Date	8/19/2021
	Estimate the number and type of families that will benefit from the proposed activities	100, Family, Targeted Population: Homeless persons, including homeless individuals, families, youth and/or veterans
	Location Description	Cedar Rapids, Clinton, Hiawath, & Marion, Iowa
	Planned Activities	Tenant-based rental assistance
28	Project Name	SOUTHWEST IOWA FIRST TIME HMBYR OPPORTUNITY - HM
	Target Area	
	Goals Supported	Creation-Preservation of Affordable Homeownership
	Needs Addressed	Limited Housing Opportunities
	Funding	:
	Description	Homebuyer-Acq
	Target Date	8/19/2021
	Estimate the number and type of families that will benefit from the proposed activities	10, Family
	Location Description	Various cities in these counties: Fremont, Montgomery, Page
	Planned Activities	Acquisition
29	Project Name	GDM HABITAT AFFORDABLE HOMEOWNERSHIP - HM
	Target Area	
	Goals Supported	Creation-Preservation of Affordable Homeownership
	Needs Addressed	Limited Housing Opportunities
	Funding	:
	Description	Homebuyer-Acq

	Target Date	8/19/2021
	Estimate the number and type of families that will benefit from the proposed activities	10, Family
	Location Description	Des Moines, Iowa
	Planned Activities	Acquisition
30	Project Name	CENTRAL IOWA SHELTER SERVICES PHASE II - HTF
	Target Area	
	Goals Supported	Creation & preservation of affordable rental hsg
	Needs Addressed	Limited Housing Opportunities
	Funding	:
	Description	NHTF Rental-New Const
	Target Date	8/19/2021
	Estimate the number and type of families that will benefit from the proposed activities	24, Family, Targeted Population: Homeless persons, including homeless individuals, families, youth and/or veterans
	Location Description	Des Moines, Iowa
	Planned Activities	Rental-New Construction
31	Project Name	ESG20 Iowa
	Target Area	
	Goals Supported	Preserve Short & Long-term Homeless Facilities&HSG
	Needs Addressed	Limited Housing Opportunities Limited Non-Housing Supportive Services
	Funding	FY2020 ESG-CV: \$9,574,948
	Description	SO, Shelter, RRH, HP, HMIS, and Admin.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	

	Planned Activities	Activities to prevent, prepare for, and respond to the coronavirus (COVID-19).
32	Project Name	HOPWA20 Iowa
	Target Area	
	Goals Supported	Preserve Short & Long-term Spc Need Facilities&HSG
	Needs Addressed	Limited Housing Opportunities Limited Non-Housing Supportive Services
	Funding	FY2020 HOPWA-CV: \$104,064
	Description	Primarily TBRA and STRMU.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Activities to prevent, prepare for, and respond to the coronavirus (COVID-19).
33	Project Name	CDBG-CV (2020)
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG-CV: \$24,123,523
	Description	Project created for all activities funded with the special CDBG-CV allocation
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	public services activities

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

Acceptance process of applications

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

The State of Iowa has not chosen to target particular geographical areas for special set-aside assistance under the CDBG Program. Rather, all non-entitlement communities are allowed to submit applications in one of the outlined funding categories on a competitive basis. Thus, Iowa has not authorized or approved any local government community revitalization strategies.

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

For Housing Trust Fund (HTF), IFA anticipates utilizing the funds in projects in areas which exhibit a strong need for housing for extremely low-income families as well as in areas that reflect the geographic priorities including high opportunity areas, very high opportunity areas, census tracts that do not contain high density of LIHTC units, and Great Places, as defined in Iowa Code Section 303.3C.

The State of Iowa will distribute community development resources in proportion to development needs in the state. Iowa does not have any specific geographic target area priorities, but does encourage investments to be targeted in areas of high level of need for all CPD grant programs. For Community Development Block Grants (CDBG) Most of Iowa's programs require jurisdictions to target non-housing community development funds in areas where at least 51% of the residents have incomes at or below 80% of the Area Median Income.

For HOME Investment Partnerships Program (HOME), Iowa does not set specific geographic target areas for HOME projects, however, it does provide points in its application scoring for developments or projects located in cities designated as Great Places through the Iowa Great Places program, Home Base Iowa Communities and Iowa Opportunity Areas. These investments leverage other federal, state and local investments to encourage holistic planning and community development.

For Emergency Solutions Grant (ESG), Iowa does not set specific geographic target areas for ESG activities. However, IFA launched a new system of homelessness Coordinated Services Regions in 2017, using a first allocation of funding through the Iowa Balance of State CoC Planning Grant. Regions commit to furthering six goals; one of the goals is to ensure a baseline of services that includes at least emergency shelter and rapid rehousing, both activities that may be funded through ESG. Applicants provide information about their regional participation and the geographic reach of their services in the annual competition.

For Housing Opportunities for Persons with HIV/AIDS (HOPWA), Iowa serves the entire state geography through participating project sponsors that cover specified regions; currently there are five sponsors.

Geographic Distribution

Target Area	Percentage of Funds

Table 10 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

n/a

Discussion

Affordable Housing

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

Introduction:

Given local market conditions, homeownership costs remain high, although they have diminished somewhat during the recent economic downturn. Even with funding limitations and cutbacks, the State of Iowa will continue to focus its HUD Community Planning and Development (CPD) funds to support activities across the housing needs spectrum, seeking to increase and improve affordable housing stock, preserve existing affordable rental housing, rehabilitate existing single- and multi-family housing, and to affirmatively further fair housing.

The one year goals vary by program and the population to be served. Some of the data in the following tables may overlap due to some programs that assist households in addition to individuals. Those served by the Tenant Based Rental Assistance (TBRA) program, for instance, may be homeless receiving rental assistance, in addition to those receiving TBRA who aren't homeless but have special needs.

As more and more people are choosing to rent, IFA continues to focus the HOME dollars on tenant-based rental assistance and the creation/rehabilitation of rental units. The new, more stringent homebuyer underwriting requirements are making it more difficult for IFA's subrecipients to find homebuyers who qualify for the assistance. This will continue to be a problem unless the cost of the housing increases dramatically or the subrecipients concentrate their efforts on lower income households.

One Year Goals for the Number of Households to be Supported	
Homeless	297
Non-Homeless	283
Special-Needs	60
Total	640

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	477
The Production of New Units	30
Rehab of Existing Units	133
Acquisition of Existing Units	0
Total	640

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

Discussion:

HTF, HOME and CDBG totals are reflected here not ESG or HOPWA. CDBG only has 133 rehab of existing non-homeless units with the remainder of the totals from HOME and HTF.

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

Introduction:

The State will from time to time provide support and technical assistance to PHAs upon local request. Specific financial assistance to PHAs under any of the Consolidated Plan formula grant programs will be considered as any other application competing for those funds, unless the administering State agency determines that both cause and authority exist to prioritize such funding under the current Consolidated Plan and the individual program's guidelines

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

This Annual Plan is for a State grantee. No summary information is available on the actions planned for the multiple public housing authorities in Iowa

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

see above

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

see above

Discussion:

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

Introduction

The Iowa Finance Authority administers various statewide grant programs that provide funding for agencies to serve those that are homeless or at-risk of homelessness. The Iowa Finance Authority administers the Emergency Solutions Grant, Housing Opportunities for Persons with HIV/AIDS, and the state Shelter Assistance Fund. The Iowa Finance Authority also serves as the Collaborative Applicant for the Iowa Balance of State Continuum of Care and provides staff support to the Iowa Council on Homelessness.

The Iowa Finance Authority continues to collaborate with the Iowa Council on Homelessness and stakeholders around the state to effectively address and work towards reducing and ending homelessness in Iowa. Projects awarded funding under the HTF program may also assist homeless and other special needs populations.

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

The State of Iowa will continue working to reduce and end homelessness by working closely with the Iowa Council on Homelessness/Balance of State Continuum of Care to identify priority needs and inform Emergency Solutions Grant (ESG) allocations. IFA, as the State ESG grantee, will continue to competitively award funds to sub-grantees at the local level to deliver housing and homeless services to persons in need, including by assessing each applicant's past performance toward system goals of reducing homelessness.

Since 2017, Coordinated Entry has made reaching rural areas of the state more efficient and has allowed outreach and services to cover areas that had not been covered in the past. Additional partners in rural areas have been developed and regional homeless hotlines have been established. Individuals facing a housing crisis or who are homeless can now walk into a regional center or call the hotline to receive information about services, have an assessment conducted, and be placed on the Prioritization List. In the urban areas street outreach is a more formal process with PATH, ESG, CoC, SSVF and shelter programs conducting outreach on a weekly basis and referring homeless households to the Coordinated Entry system. The developing system of Coordinated Services Regions (which also serve as Coordinated Entry hubs) also supports expanded outreach throughout the geography. Development of regions and improvements in the Coordinated Entry system will continue in 2019 to support outreach and

assessment of individual needs.

Addressing the emergency shelter and transitional housing needs of homeless persons

In the 2019 program year, 27 agencies are slated to receive an ESG grant and 31 agencies (eight overlapping) are slated to receive a Shelter Assistance Fund grant. The majority of grantees provide some form of shelter, usually emergency shelter. Agencies that are "grandfathered in" under the federal ESG Interim Rule may also use ESG or SAF funds to provide transitional housing.

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 stated goals here (successful exits to permanent housing, shortening length of time homeless, increasing access to housing, and preventing returns to homelessness) are all system performance measures of the 2009 HEARTH Act, and in turn have informed the development of HUD's ESG and Continuum of Care Program (CoC) Interim Rules. Because the Iowa Finance Authority works so closely with the CoCs in Iowa, especially through the Iowa Council on Homelessness and the Iowa Balance of State CoC, Iowa's ESG program also has developed in very close connection to these system goals, and to the entire framework of coordination that is built to support these system goals. Goals for the next year include continuing to improve the system of Coordinated Services Regions, Coordinated Entry, performance monitoring and assessment, and reviewing the current CoC governance structure with a HUD-approved technical assistance provider to potentially make changes.

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 State has extensive systems in place, both legally mandated and voluntary; to ensure that low-income and extremely low-income individuals and families avoid entering homelessness upon exiting publicly funded institutions and systems of care. Local service providers work closely with state agencies

on transition plans for youth aging out of foster care, discharge plans for patients leaving mental and physical health facilities, and former prisoners reentering the general population.

One goal of the new system of homelessness Coordinated Services Regions is to provide a planning platform in the future that that will allow the CoC to improve partnerships and systems of care between homeless housing services and other community sectors.

Discussion

AP-70 HOPWA Goals – 91.320(k)(4)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	100
Tenant-based rental assistance	48
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	148

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

The Housing and Community Development Act of 1974 requires that any community receiving HUD funds affirmatively further fair housing. Communities receiving CDBG entitlement funds are required to: examine and attempt to alleviate housing discrimination within their jurisdiction; promote fair housing choice for all persons; provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, gender, disability, familial status, or national origin; promote housing that is accessible to and usable by persons with disabilities; and comply with the non-discrimination requirements of the Fair Housing Act. The State of Iowa meets these requirements through the regular preparation of an Analysis of Impediments to Fair Housing Choice (AI).

The State's Fair Housing Action Plan identifies six impediments to fair housing and makes a number of recommendations to lower these barriers. Barriers identified include the following: the potential for increased urbanization to exacerbate segregation; limited housing choice for members of the protected classes because of their lower incomes; increased difficulty for minorities to achieve homeownership; the potential for members of the protected classes to experience difficulty finding housing due to specific housing needs; policies inconsistent with fair housing standards and best practices; the need for expanded fair housing education, outreach and enforcement. The Fair Housing Action Plan will provide a series of recommended actions. These range from increased education and testing, to incorporating the Site and Neighborhood Standards of the HOME Program, to requiring and incentivizing the location of housing developments. The State will evaluate the efficacy of these recommendations and implement those that will best serve Iowans. The availability of HTF dollars will help to expand the affordable housing options for extremely low-income Iowans.

Discussion:

see above

AP-85 Other Actions – 91.320(j)

Introduction:

Actions planned to address obstacles to meeting underserved needs

The primary obstacles to meeting underserved needs are lack of financial and human resources, and a growing gap between housing costs and incomes. The state will continue to use its resources carefully and strategically as evidenced in this plan to reduce the effects of the cost/income gap.

Actions planned to foster and maintain affordable housing

In addition to using CDBG, HOME, HTF, ESG, and HOPWA, the state undertakes numerous other actions to foster and maintain affordable housing. Coordinating the use of the Low Income Housing Tax Credit (LIHTC) program to develop new affordable housing is a critical component of the state's affordable housing strategy. Information on the LIHTC program administered by IFA can be found at <http://www.iowafinanceauthority.gov/Public/Pages/PC116LN11>

Other state programs administered by IFA for affordable rental can be found at <http://www.iowafinanceauthority.gov/Programs/AffordableRental>

for home ownership at <http://www.iowafinanceauthority.gov/Programs/AffordableHomeownership>

and for homelessness the Shelter Assistance Fund at <http://www.iowafinanceauthority.gov/Public/Pages/PC84LN13>

Other state programs administered by IEDA include the Workforce Housing tax Credit program (WHTC), information can be found at <http://www.iowafinanceauthority.gov/Public/Pages/PC116LN11>

the Tax Increment Financing program (TIF) information can be found at <http://www.iowaeconomicdevelopment.com/CommunityDevelopment/TIF>

Actions planned to reduce lead-based paint hazards

As Iowa's housing stock continues to age, the incidence of hazards from deteriorating lead paint will likely increase. The prevalence of lead-based paint may be used to develop measures of potential risk from LBP hazards, even if the hazards are not yet present. In general, the higher likelihood that homes built before 1950 contain lead-based paint, combined with possible physical deterioration associated

with their age, puts these pre-1950 homes in a high-risk category for exposure to LBP hazards. Many homes built between 1950 and 1980 also contain lead-based paint; however, their relatively newer condition puts them in a category of moderate risk for exposure to LBP hazards.

The state of Iowa's Childhood Lead Poisoning Prevention Program (CLPPP) conducts testing of children, provides medical and environmental case management for children with lead poisoning, conducts education and outreach regarding childhood lead poisoning in communities, and manages blood lead testing and case management data. The CLPPP targets children under the age of six years. With funding from federal and state sources, the program provides direct services in 28 counties and contracted services to Title V child health clinics and public health agencies in 71 counties.

Recent legislative changes have expanded the scope of lead-poisoning prevention efforts in Iowa. In 2009, the state passed legislation giving the IDPH authority to certify renovators who work in target housing and child-occupied facilities. The legislation also gives IDPH authority to extend pre-renovation notification requirements to child-occupied facilities. In 2007, the state passed legislation that requires all children entering kindergarten to be tested for lead poisoning. This requirement helps to assure that children who are identified as lead-poisoned will receive interventions to reduce the effects of lead poisoning on their growth and development.

The State will follow, and monitor grantees to ensure compliance with the HUD lead-based paint regulations implementing Title X of the Housing and Community Development Act of 1992. These regulations cover the CDBG, HOME, ESG, and HOPWA programs, and identify the appropriate type of activity to control lead paint hazards, in projects using federal funds. The \$25,000 abatement threshold in Title X has not been adjusted since it was established, while construction/ rehabilitation costs have escalated. This can preclude a number of homes from being rehabilitated because abatement costs make it financially unfeasible. The State will further comply with LBP regulations of the EPA and those enacted by the State of Iowa, including licensing requirements for rehabilitation contractors.

Iowa will coordinate for training, education and other resources related to lead-based paint hazards, and will require that grantees and sub grantees utilize staff and contractors that have the appropriate training and certification.

Actions planned to reduce the number of poverty-level families

To facilitate state wide economic development and create jobs, the state, using bi-partisan support in the State Legislature in 2011, and through the IEDA has set bold economic development goals for the coming years: Create 200,000 private-sector jobs, raise family incomes by 25 percent, cut the cost of state government by 15%, reestablish Iowa's world class education system, and make Iowa the "Healthiest State." The State, in partnership with non-profit agencies and businesses, can influence the chances of moving families and individuals to move up and out of poverty by supporting local and

regional efforts to create new jobs and improve family incomes. State and regional projects and initiatives that will impact the employment and economic levels of employees and residents, such as financial assistance for entrepreneurial and small businesses, tax incentives, site location assistance, infrastructure improvements to water and sewer systems, community facilities, and downtown commercial rehabilitation, will create a positive economic environment. The use of the CDBG Section 108 Loan Guarantee program will play an important role in this initiative.

Actions planned to develop institutional structure

One of the biggest gaps in the institutional delivery system is the large territory that must be covered by a limited number of staff members. The foundation of institutional structure that supports affordable housing, and community and economic development is the excellent working relationship and coordination of activities between the IEDA and the IFA. That relationship, combined with the Iowa Association of Regional Councils creates a state wide collaborative effort to design and implement affordable housing, and community and economic development programs. The Iowa Association of Regional Councils is the trade association for the 17 Councils of Governments (COGs) in Iowa. Since 1988, IARC has brought leaders and communities together to promote economic growth, improve public sector services, and solve regional issues for the future of Iowa. Iowa COG's are able to help promote programs and administer projects at the local level.

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

Public agencies, for-profit and non-profit private organizations all play a part in the provision of affordable housing, social services, capital improvements, and economic development. However, the lack of financial resources for development, operations, and support services is a huge gap to overcome. Addressing these gaps will be a high priority for Iowa. The State will continue to work to provide stronger coordination between agencies and local organizations. IEDA provides regular work shops and technical assistance for current and potential applicants for CDBG funds, including extensive resources available on their web site at

<http://www.iowaeconomicdevelopment.com/CommunityDevelopment/CDBG>

IFA provides similar technical assistance and web resources at <http://www.iowafinanceauthority.gov/>

Additionally IFA coordinates monthly meetings with the Iowa Council on Homelessness and its various

committees.

The State welcomes new partners, and will continue to proactively work with other agencies and for-profit and non-profit private organizations to ensure that efficient and effective programs are developed and managed. To the extent that redundancy is reduced, and streamlining is increased, the State and other jurisdictions will all better serve Iowa's communities.

Discussion:

Program Specific Requirements

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

Introduction:

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.320(k)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	2
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.	80.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.320(k)(2)

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

The State of Iowa only invests HOME funds in activities identified Section 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:

The State of Iowa does not use HOME funds to target housing for certain populations. The recapture will be enforced through conditions in the IFA-recipient contract, implemented through local agreements and monitored for compliance with recorded legal instruments containing the necessary provisions and covenants. Recapture requirements will be secured through receding forgivable loans due upon sale or transfer within the period of affordability, reducing the HOME investment amount to be recaptured on a pro-rata basis for the time the homeowner has owned and occupied the housing measured against the required affordability period (example: 1/5 of the amount of the HOME subsidy to the homeowner will be forgiven for each year of a 5-year affordability period). Direct subsidy to homebuyer activities involving HOME funded rehabilitation after the purchase of the property is calculated by the difference between the fair market value after-rehab and the purchase price.

In the event that a homeowner unit that is assisted is sold, conveyed, or otherwise transferred during the affordability period, the total amount of the HOME investment for the unit, less the pro-rated HOME investment amount for the length of time the homeowner owned and occupied the unit will be recaptured out of the net available proceeds. The net proceeds are the sales price minus superior loan repayment (other than HOME funds) and any closing costs. HOME recipients will be encouraged to counsel homebuyers to maximize their ability to maintain the property and pay the mortgage. The Iowa land sales recording and abstracting processes will assist IFA and recipients in ensuring long term affordability of HOME funded projects.

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:

The recapture will be enforced through conditions in the IFA-recipient contract, implemented through local agreements and monitored for compliance with recorded legal instruments containing the necessary provisions and covenants. Recapture requirements will be secured through receding forgivable loans due upon sale or transfer within the period of affordability, reducing the HOME investment amount to be recaptured on a pro-rata basis for the time the homeowner has owned and occupied the housing measured against the required affordability period (example: 1/5 of the amount of the HOME subsidy to the homeowner will be forgiven for each year of a 5-year affordability period). Direct subsidy to homebuyer activities involving HOME funded rehabilitation after the purchase of the property is calculated by the difference between the fair market value

after-rehab and the purchase price.

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:

The state does not engage in this activity with HOME funds.

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

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

IFA as a state ESG recipient requires each subgrantee agency to sign a contract for each award granted under ESG. The contract passes on the ESG requirements to the subgrantees in accordance with the ESG regulations.

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

In 2017, the Iowa Balance of State CoC implemented a regional approach to Coordinated Entry to ensure entire CoC coverage across 96 counties. The Coordinated Entry system operates through 12 regions thus far, ranging in size and services. Each region identified a designated lead agency whose responsibilities include managing the HMIS and domestic violence services comparable database (DVIMS) Prioritization List, ensuring Coordinated Entry is easily accessible, supporting agency participation, and conforming to the statewide policies and procedures. Regions are encouraged to utilize both physical and virtual access points to ensure access across the entire service area.

The statewide policies instruct regions and agencies on when to complete the common assessment tool, when to place persons on the Prioritization List, and how persons will be prioritized. Persons are prioritized first by the score on the common assessment tool, then by chronic status, length of time homeless or on the streets, currently fleeing domestic violence, veterans, youth, and finally length of time on the Prioritization List. Regions are required to have regularly scheduled meetings, preferably weekly, to review the Prioritization List to ensure timely responses to people in need.

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 Iowa Finance Authority (IFA) is the State ESG grantee. IFA works closely with the Iowa Council on Homelessness, the decision making body for the Balance of State Continuum of Care, to plan ESG allocations. IFA awards ESG funds on a competitive basis. Applications are accepted via an online platform periodically—usually once each year. IFA provides draft application materials in advance for stakeholder and public comment, and also publicly posts written responses to all comments received, before competition materials are finalized. Agencies throughout the State may apply for ESG funds. Eligible applicants include units of general local government and nonprofit service agencies.

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.

Not applicable to states.

5. Describe performance standards for evaluating ESG.

For the 2019 ESG competition, applicants were evaluated according to the following performance standards: 1) Number of participants served; 2) Severity of needs of participants served (percentage of past participants served that were coming directly from the streets or places not meant for human habitation); 3) Rapid Rehousing: Past average length of time from enrollment to permanently housing a participant; 4) Rapid Rehousing: Percentage of past participants that exited to a permanent destination; 5) Shelter: Average length of stay, compared to exits to permanent housing; 6) Street Outreach: Percentage of past participants that exited to the streets or unknown; and 7) Homelessness Prevention: Past percentage of participants that exited and remained permanently housed. Agencies were also evaluated on data timeliness and data completeness to promote quality and accuracy of data used to assess performance.

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

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

Applications submitted by eligible recipients

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

N/A

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

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

Eligible applicants for HTF include owners or developers that may be a for-profit entity or a nonprofit entity. The owner and development team must not be debarred or excluded from receiving federal assistance prior to selection or entering into a Written Agreement. Applicants and their development team will undergo an evaluation by IFA of their capacity, and the project is required to meet IFA's stringent underwriting criteria.

Eligible applicants will certify that housing units assisted with HTF will comply with HTF program requirements during the entire period which begins upon selection and ends upon the conclusion of all HTF funded activities. Applicants shall demonstrate familiarity with requirements of other Federal, State or local housing programs that may be used in conjunction with HTF funds to ensure compliance with all applicable requirements throughout the 30-year HTF affordability period. Any person who is an employee, agent, consultant, officer, elected official, or appointed official of the State of Iowa, IFA, or state recipient or sub-recipient receiving HTF funds (collectively Non-eligible Persons) shall not be eligible to receive HTF funds. This includes partnerships and corporations where the controlling partner, controlling member, or person(s) in control of such entity is a Non-eligible Person or Persons.

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".

The needs of extremely low-income renters, those with incomes below 30% of Area Median Income (AMI), are a high priority for IFA. Applications will be evaluated in accordance with need and scoring

criteria that emphasizes other State priorities as outlined in the Annual Action Plan. The application will describe the project including building type, number of units, property type and proposed address. The application will also outline all sources of funds for the project as well as the uses for those funds. The application shall describe the activity to be funded with HTF. The Applicant must certify that the assisted units will comply with HTF requirements. Activities to be undertaken include new construction, adaptive reuse, and rehabilitation of rental housing.

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".

Applications will be awarded points in several categories such as: targeted populations, Great Places, Home Base Iowa community, fully accessible units, utilization of project-based rental subsidy, Opportunity Areas, leverage, and flexible tenant selection plans.

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".

IFA will accept and consider proposals from across the state consistent with the state's certification to affirmatively further fair housing. The needs of very low-income and extremely low-income tenants across Iowa are a high priority; however, geographic location of a project will be considered as it relates to opportunity areas and location near other affordable projects.

The "high" and "very high" opportunity areas were calculated as part of the State of Iowa's Analysis of Impediments to Fair Housing Choice. HUD adapted the Communities of Opportunity model to calculate opportunity index scores for each census block group on six separate dimensions. Each dimension analyzed for Iowa's Analysis of Impediments to Fair Housing Choice includes a collection of variables describing conditions for each census tract in the State.

- Prosperity includes rates of family poverty and the receipt of public assistance (cash welfare, such as Temporary Assistance to Needy Families) to capture the magnitude of a given neighborhood's rate of poverty.
- Labor Market Engagement measures the level of employment, labor force participation, and education attainment in each neighborhood to describe its local human capital.
- Job Access gives each census tract a score based on distance to all job locations, weighting larger employment centers more heavily. The distance from any single job location is positively

weighted by the number of job opportunities at that location and inversely weighted by the labor supply (competition) of the location.

- Mobility was calculated based on commute times and the percent of people who travel to work via public transit.
- School Proficiency uses the results of the Adequate Yearly Progress (AYP) test by elementary, middle, and high school students as a proxy for educational quality. Rates of proficient scores for all grades for both the reading and math exams are combined into one overall score for each school district.
- Community Health for a given tract was calculated as a function of the number of residents without health insurance and low food access ranking by the USDA.

The objective of pinpointing Opportunity Areas is to identify places that are good locations for investment that may not have been selected based on other criteria. This identification allows for balanced investment across neighborhoods that offer opportunities and advantages for families.

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".

Applicants must demonstrate the ability to perform the tasks associated with the requirements of the HTF and complete the assisted project in a timely manner.

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".

Applications for projects receiving Project-Based Rental Assistance will receive a significant number of points (up to 15) in the scoring criteria.

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".

All eligible projects will be scrutinized as to the ability of the project to be financially feasible. IFA's

financial underwriters review all applications.

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".

High housing costs reduce economic opportunities, limit access to jobs and services, and restrict the ability of lower-income households, including the elderly and persons with disabilities, to live in safe and healthy homes in the communities and neighborhoods of their choice. Between 2000 and 2010 the population of Iowa grew 3% to 3,016,267 people which represented 1,215,954 households, a 5% increase in total households throughout the State. According to 2007-2011 CHAS data for Iowa, 224,370 households, 18% of the total households in the State, were in the low-income range of 51-80% HUD Area Median Family Income (HAMFI or AMI); 146,655 households, 12% of the total households in the State, were in the very low-income range of 31-50% AMI; and 135,840 households, 11% of the total households in the State, were extremely low-income at or below 30% AMI. Overall, 506,865 households in the State were at or below 80% of AMI, or 42% of the total households in the State.

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".

Applications for projects will receive a significant number of points (up to 15) based on the total amount of local, non-federal funds designated leverage (as approved by IFA) will be divided by the amount of total HTF funds requested.

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

Yes

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

Yes

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

Yes

7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds.

Enter or attach the grantee’s maximum per-unit development subsidy limits for housing assisted with HTF funds.

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

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

IFA has examined the development costs of several recently awarded LIHTC projects in nine distinct communities that are considered representative of the types of housing that will be developed with HTF funds, and has established the following HTF maximum subsidy limits for statewide use.

BR Size	Subsidy Limit
Efficiency	\$102,700
1 BR	\$134,300
2BR	\$173,800

3BR	\$205,400
4BR	\$237,000

The method used for determining the subsidy limits is by multiplying the mean gross square foot development cost by the mean square foot unit size for all 11 awarded 2016 LIHTC projects including new, adaptive reuse, and rehab construction multifamily units. Subsidy limits will be calculated and updated annually. No significantly higher or lower cost development areas were observed when reviewing total development cost statewide. Exceptions to the established limits will not be allowed for any mitigating cost factors.

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

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

Properties served with HTF funds must comply with all applicable state and local codes, standards, and ordinances by project completion. In cases where standards differ, the most restrictive standard will apply. In the absence of a State or local building code, the International Residential Code or International Building Code of the International Code Council will apply.

Properties must meet local housing habitability or quality standards throughout the affordability period. If no such standards exist, HUD's Uniform Physical Conditions Standards (UPCS), as set forth in 24 CFR 5.705, will apply. All rehabilitation projects funded through the HTF program must follow Iowa's HTF Minimum Housing Rehabilitation Standards. These guidelines are available on the Iowa Finance Authority website: Iowa HTF Minimum Housing Rehabilitation Standards.

All projects with 26 or more units are required to have the useful remaining life of the major systems determined. Major systems include: structural support; roofing; cladding and weatherproofing (e.g., windows, doors, siding, gutters); plumbing; electrical; and heating, ventilation, and air conditioning. If

the useful remaining life of one or more major system(s) is less than the applicable effective period, the system(s) must be either included in the scope of work or a replacement reserve must be established and monthly deposits made to the reserve account to adequately repair or replace the systems as needed.

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

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.

As a matter of course, IFA will not limit the beneficiaries of the program or target specific subpopulations of extremely low-income households. IFA reserves the right to fund a project that targets a specific sub-population if the project merits an award.

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.”

N/A

Discussion:

