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Municipal Housing Resource Guide: Resources for Multi-Family Affordable Housing in McLean County, Illinois

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Abstract

In 2015, an interjurisdictional group of leaders in McLean County identified the need to take a regional approach to housing issues in the county and shortly thereafter they created the Regional Housing Initiative. This entity is led by the McLean County Regional Planning Commission and includes two committees who work together to identify gaps in housing, coordinate resources, and implement solutions for housing needs in the community. To support these efforts, the Regional Housing Initiative identified the need to compile resources to support multi-family housing acquisition, development, and preservation. This capstone presents the result of that request. The Municipal Housing Resource Guide identifies multi-family affordable housing resources from Federal, State, Regional, and other non-profit or miscellaneous entities. To develop this Guide, research was conducted on the context for the development of this Guide including the history of the McLean County Regional Planning Commission and their involvement in regional initiatives and the background of Federally assisted housing programs. Additionally, the local context and purpose of the Guide is explored and the development of the Guide is outlined. After the Municipal Housing Resource Guide is presented, the capstone outlines how the Guide may be used, its limitations, and three major challenges that multi-family housing stakeholders face and recommendations and strategies to ameliorate them.

Introduction

In the past decade, communities across the country have seen dramatic increases in housing costs. In McLean County, Illinois, where this research was conducted, housing costs have been perceived to be relatively low, although the affordability of housing for targeted populations has been identified as a concern of both the City of Bloomington and the Town of Normal (The City of Bloomington, 2015; The Town of Normal, 2017). The BN Regional Housing Study (2017), the county's first regional housing study, found that the housing market in McLean County appeared to be faring well, and the housing needs of McLean County residents were being met (McLean County Regional Planning Commission, 2018). However, the study also indicated various troubling aspects of the community's affordable housing stock. Primarily, age-restricted affordable housing and housing for individuals with disabilities are lacking, although data was scant to determine the extent of this issue. Additionally, the study identified the goal to create an interjurisdictional group to coordinate the housing programs and policies from a regional perspective, due to the proximity and interconnected nature of the major municipalities in the county (McLean County Regional Planning Commission, 2018; McLean County Regional Planning Commission, 2021). Shortly after this study was published, the Regional Housing Initiative was established and two working committees were coordinated: the Regional Housing Staff Committee and the Assisted and Supportive Housing Committee.

Since the BN Regional Housing Study was conducted and the Regional Housing Imitative was established, much has changed in McLean County and across the country. With the onset of the COVID-19 pandemic, housing is increasingly recognized as a multidimensional necessity– from a place to rest, work, and attend school virtually. The "Housing is Health Care" movement has gained momentum by acknowledging that safe and stable housing protects against the COVID-19 virus and is a critical social determinant of health (Calabro et al., 2020; Rolfe et al., 2020). In McLean County specifically, there has been a net decline in federally assisted housing year-over-year since the creation of the Regional Housing Initiative. Additionally, national studies have indicated that households who rent have been particularly and negatively impacted by the economic impacts of the COVID-19 pandemic (Harvard Kennedy School, 2020).

Navigating affordable housing resources is notoriously difficult for both community members seeking assistance and the local administrators of affordable housing programs. Housing policies and programs are uniquely complicated because of its fragmented framework for funding sources and agencies administering funds, funding mechanisms, the process of applying for funding, complying with funding requirements, inter-sector coordination, among other factors, which are all made more complicated by the scarcity of resources for affordable housing. Organizations and municipalities have a myriad of grants, agencies, and programs to track when administering housing programs.

Due to these converging concerns and the complicated nature of affordable housing programs, the Regional Housing Initiative called for a resource to outline multi-family housing programs to support the development, acquisition, preservation, and maintenance of multi-family affordable housing. Through this request, the concept for the Municipal Housing Resource Guide was developed. This Guide aims to compile federal and state government resources and non-profit/quasi-governmental resources to support multi-family affordable housing into a guide for municipal government entities, non-profit agencies, and housing developers in McLean County.

The Guide will present the various multi-family housing programs in one document that outlines available funding, the nature of the funding, and the federal and state entities administering multi-family affordable housing programs. To do so, the local and federal context for multi-family affordable housing programs are outlined, starting with the history and background of the McLean County Regional Planning Commission. The next section outlines the history of the U.S. Department of Housing and Urban Development (HUD), preceding federal housing agencies, and the most common federal housing programs to shed light on the current resources available for affordable multi-family housing. Next, I thoroughly review the Municipal Housing Resource and the Regional Housing Initiatives Committee and my role at MCRPC. Finally, the Development of the Municipal Housing Resource Guide section outlines today's federally assisted housing landscape and the resources and tools offered in this Guide. This capstone concludes with strategies to support a robust, multi-family affordable housing market in McLean County centered around local challenges.

Background and History

The McLean County Regional Planning Commission (MCRPC)

The McLean County Regional Planning Commission was established in 1968. Before MCRPC's creation, McLean County's population was relatively small, and the growth rate was slower than both Illinois and the Country. This changed between 1960 and 1970, when McLean County's population grew by nearly 25 percent, with most of the growth attributed to population increases in the Bloomington-Normal urbanized area and the expansion of the Illinois State University. During this time, federal grant opportunities tripled, which initiated the development of policies that institutionalized fiscal management, consensus building, and regional coordination for agencies receiving federal funds (Conlan, 2006). With that, the Federal-Aid Highway Act of 1962 established communities with 50,000 people or more as designated Metropolitan Planning Areas (MPAs) and mandated for these areas to create Metropolitan

Planning Organizations (MPO) to carry out continuing, cooperative, and comprehensive[1] planning for urban development and transportation (Weiner, 1987). The planning carried out by these regional entities is required for municipalities to receive federal funding. MPOs are often multifunctional agencies that can come in various forms; regional councils (RCs) or councils of governments (COGs), or planning commissions, are all interchangeable names for entities that are often a part of MPOs (National Association of Regional Councils, 2021).

In 1966, the combined population of the City of Bloomington and the Town of Normal reached 50,000 people (McLean County Regional Planning Commission, 2022). To comply with the Federal Highway Act and accommodate the growing population[2], the McLean County Board established the Regional Planning Council (RPC) in 1967, including a seven-person steering committee and by-laws. Additionally, a Regional Service Agreement with the County, the City of Bloomington, and the Town of Normal was adopted. Shortly thereafter, the RPC became the McLean County Regional Planning Commission (MCRPC) and the area's MPO in 1968. This entity includes both a Commission and MCRPC Staff. The Commission provides procedural guidance to the MCRPC staff, which comprises individuals appointed by the Town of Normal, City of Bloomington, and McLean County government (McLean County Regional Planning Commission, 2018).

During the 1970s, MCRPC was engaged in a wide variety of planning activities. These activities included creating federally mandated MPO planning documents, such as developing the Transportation Improvement Plan (TIP) and establishing regional development policy

[1] These elements are known as the 3Cs of planning for MPOs

[2] McLean County is the largest county in Illinois by area and includes five cities, with Bloomington as the county seat, one town, and 16 villages. The population of McLean County is now 173,219 people, compared to approximately 83,877 in the 1960s. Although the population has declined slightly in recent years, McLean County has generally experienced population growth; between 1960 and 1970, the population growth peaked at 24.5%.

standards as well as engaging in tasks that were unique to this timeframe and area. These activities included preparing McLean County for the implementation of paramedic services and administering a law enforcement program. MCRPC also supported the 1970 census, with one person designated as the “Census Key Person,” a task that continues today.

During the 1980s and 1990s, MCRPC continued to evolve to address the unique needs of the times as federal funding for regional initiatives diminished. McLean County experienced continued rapid growth, and between 1980 and 1990, the population increased by 8.39%, far outpacing peer cities such as Champaign and Peoria. McLean County experienced the greatest absolute growth of all Illinois counties outside of Cook County between 1970 and 1990. Long-range planning and citizen involvement became central to the planning of MCRPC during this timeframe. Additionally, the executive committee was created, and the commission was restructured to include more diverse community stakeholders like the local school districts, the airport authority, and the water reclamation district.

Between 2000 and 2021, MCRPC re-established itself as a regional partner. In 2001, the McLean County Geographic Information System, known as MCGIS, was officially established with MCRPC as the lead agency. In 2007, the Illinois Department of Transportation (IDOT) established Illinois Regions for the Human Services Transportation Plans (HSTP) to support the coordination of rural transit. In 2009, McLean County was established as the county coordinator for HSTP region 6. Although MCRPC activities are deeply intertwined with the County and Municipal governments, the McLean County Regional Planning Commission was a separate entity until 2019, when McLean County Government absorbed MCRPC as a new department (McLean County Government, 2019).

Today, MCRPC has a team of six employees. The Commission currently consists of eleven members representing the interests of the Town of Normal, the City of Bloomington, Bloomington Public School District 87, the Bloomington-Normal Airport Authority, the Water Reclamation District, McLean County, and the Unit 5 school board of Bloomington. Commission members are appointed by the McLean County Board and can serve indefinitely.

The Commission is headed by a chairperson who the members of the Commission elect. They hold one-year terms and are eligible for re-election for three consecutive years in the same office. The Chairperson also heads the Executive Committee, which has three voting members, including the chairperson. These members are appointed and responsible for the Commission's administrative duties and personnel. The Executive Committee directs the work of the Executive Director of MCRPC, who oversees MCRPC staff.

There are also a variety of committees that often involve interjurisdictional cooperation. The two primary committees of MCRPC are the Transportation Policy Committee and the Transportation Technical Committee. Together these two committees guide the work that MCRPC carries out in its MPO functions. The other committees headed by MCRPC include the general intergovernmental group that meets when requested and six other special committees: Region Six Human Services Transportation Joint Committee, Greenways, Indicators & Metrics, Transportation Advisory Committee (TAC), Sustainable Transportation, and the Regional Housing Initiatives Committee. These entities provide insight and information into the diverse planning processes that MCRPC is involved in and offer different jurisdictional entities to communicate regularly.

MCRPC's mission is to "bring expert planning, deep local knowledge, and vibrant public participation as [it] shape[s] [its] future to promote opportunity, livability and sustainability."

MCRPC planning emphasizes sustainability which requires the coalescence of economic growth, environmental sustainability, and social progress (McLean County Regional Planning Commission, n.d.). The functions of MCRPC include research, the creation of long-range goals and objectives, plan implementation tools (e.g., zoning and mapping), transportation planning[3], comprehensive planning, and other special planning services for Bloomington, Normal, and other municipal entities in McLean County as well as the County government (McLean County Regional Planning Commission, 1969). The initiative to develop a Municipal Housing Resource Guide aligns with these functions and MCRPC's mission.

Many of the planning concepts present during the inception of the planning commission are still present today (e.g., comprehensive planning, transportation planning, and housing studies) and have expanded to address the changing nature of cities and society. Not only does McLean County have a larger population, which inherently complicates planning processes, but the social and economic challenges and opportunities faced by communities are also distinct from previous considerations for planning. Across the country, communities are more implicated in the global economy than previous generations. Environmental concerns are growing. Communities are experiencing increased connectivity through advancements in technology and transportation. Infrastructure maintenance has increasingly posed financial problems for government agencies (Bennon et al., 2017). Additionally, the COVID-19 pandemic emphasized and intensified a myriad of social and economic issues for both individuals and institutions.

[3] Transportation planning initially involved the Transportation Study, a country survey of existing developed properties and vacant land in the late 1960s. Today transportation research and planning involve a variety of documents, most prominently the Long-Range Metropolitan Transportation Program (LRTP) and the complimentary Transportation Improvement Program (TIP) with includes a survey of current and developing transportation projects and short- and long-term transportation policies.

Contemporary planning must consider these new challenges and the legacy of racism created and perpetuated by residential segregation through urban planning and public policy. This has created persistent geospatial segregation and has contributed to racial disparities[4] in many aspects of life, including worse health outcomes for communities of color, especially Black residents, lower health insurance rates, lower household and individual median incomes (Conduent Health Communities Institute, 2019), and higher unemployment (McLean County Health Department, 2019).

Despite these challenges, McLean County remains a relatively prosperous area with a high quality of life (University of Wisconsin Population Health Institute, 2021; McLean County Regional Planning Commission, 2009). McLean County is centrally located in Illinois, which provides various benefits that include but are not limited to the proximity to vital economic resources, transportation thoroughfares, and high-quality soil for farmland. In McLean County, the median household income for the county has generally increased from year to year and is currently $67,675 (United States Census Bureau, 2021), which is greater than both Illinois and the United States. The poverty rate is 14.6 percent which is slightly higher than Illinois overall. Individuals 18-24 years old are the largest demographic group living in poverty (McLean County Regional Planning Commission, 2019). This may be due to the number of higher education institutions (e.g., Illinois State University, Illinois Wesleyan University, Heartland Community College) in McLean County and, in turn, the large population of students who often have little or no income. While the current unemployment rate, 5.4 percent, is relatively high, it is lower than the employment rate in U.S. and Illinois, and it is relatively similar to bordering counties in

[4] The largest racial group in McLean County are white non-Hispanic residents, who make up 79.5% of the population, the next largest group are Black or African American residents who make up 8.2% of the population, Asian non-Hispanic residents make up 5.1% of the population and 4.81% of the population is Hispanic. The population of McLean County has been getting older overall and the median age is currently 33 years old.

central Illinois (Illinois Department of Employment Security, 2021). Preceding COVID-19, unemployment rates remained consistently and considerably lower than the country's and state's rates at 3.5 percent (United States Census Bureau, 2018).

Planning commissions are mandated to have long-term plans to best prepare for the ever-changing nature of cities, including the variety of challenges and opportunities listed above. To achieve this, planners are more equipped than ever before with modern modeling tools, open-data resources, and planning groups, such as the American Planning Association (APA), that support best practices and innovation. Ultimately, MCRPC leverages these tools and local knowledge to envision a better future for the community and equip government agencies and local institutions to improve the quality of life for community members.

The top five goals of MCRPC's strategic plan include comprehensive planning, transportation planning, data gathering and analysis, regional housing initiatives, and Smart Cities initiatives.[5] MCRPC is not directly involved in the direct implementation of these five goals, such as building housing, developing roads, or installing Smart City technology. However, MCRPC is charged with setting local policy and coordinating with other entities to ensure the community is well-equipped to implement changes in the county. MCRPC is a regional entity that has been involved in the multifaceted and intersectional policies that have shaped McLean County since its founding. Thus, housing is particularly intersectional with the regional planning of MCRPC. Housing resources intersect with transportation planning, comprehensive planning, and the myriad of committees and initiatives led by MCRPC. By examining the local history of MCRPC as an organization, the Municipal Housing Resource Guide will be more informed by

[5] Smart Cities initiatives involves leveraging technology for planning and improving the quality of life in McLean County.

the policies and programs that shaped current resources. The following section explores history of federal housing policies and examines how these policies diffused to McLean County.

Brief History of Federally Assisted Housing

Until the Great Depression, federal housing policy in the United States was sporadic, limited, and reactionary. This is evidenced by the initial federal actions towards housing initiatives which started in 1892 when Congress authorized funding to investigate slum housing conditions. Although not much came out of these investigations it marked the beginning of the federal understanding of the importance of housing for the American public and demonstrated how limited involvement initially was. World War One (WWI) sparked a more involved response to address housing needs with the first federally funded housing program in 1918, which built housing for shipbuilders during the war effort (Edson, 2011). These initial housing policies enacted were aimed at addressing very specific housing concerns and did not diffuse to less populated areas, such as McLean County.

Almost 15 years after the first federally funded housing for shipbuilders for WWI, federal policymakers took on housing in a more intentional and coordinated way in response to the Great Depression. During this time, there were a myriad of agencies, Acts, and initiatives to structure and then restructure administrative duties and policies for housing (National Archives, 2016). These policies for housing were wrapped in large and multifaceted bills to address the incredible financial strain brought on by the stock market crash and were aimed at addressing general economic stimulus recovery and were often targeted to support single-family housing. The Reconstruction Finance Corporation Act of 1932 and its amendments are a prime example of the housing policy as a tool for economic recovery and homeownership support. This Act aimed to support short-term employment in manufacturing and construction, including funding for the nation's first slum clearance program. This Act also established the Reconstruction Finance Corporation (RFC), a mortgage loan authorization entity that provided financial aid to businesses, railroads, and financial institutions, to support private corporations in developing housing for their low-income workers, among other business and infrastructure-related activities (Britannica, 2015). This housing support initiated by the RFC is regarded as the federal government's first major involvement in housing policy (US Department of Housing and Urban Development, 2012).

Many of the institutions established and the programs enacted in the response to the Great Depression shaped the current framework for the federal government's housing policies and programs today (Thompson, 2006). Although this Municipal Housing Resource Guide only includes information regarding resources for multi-family housing, information on the resources for mortgage assistance and single-family homeownership provides the foundation for how programs evolved and grew to include more diverse types of housing resources. Additionally, these programs set the context for how cities developed in the 20th century, particularly how cities across the country became as racially and socioeconomically segregated as they are today (Rothstein, 2018).

The Federal Home Loan Bank Act of 1932 and the Home Owner's Loan Act of 1933 are primary examples of foundational policies that created and reinforced racial segregation and shaped the housing landscape we see today. These Acts established the Federal Home Loan Bank System and the Home Owner's Loan Corporation (HOLC). The Federal Home Loan Bank Act aimed to support borrowers by extending the terms of mortgage loans and providing low-cost funds for government-sponsored banks, known as Federal Home Loan Banks, to provide to private member banks to extend mortgage loans to borrowers (US Department of Housing and

Urban Development, 2014). As foreclosure rates skyrocketed during the Great Depression, HOLC provided mortgage relief by refinancing short-term high-interest loans into loans with longer terms, among other activities. In addition, HOLC developed a standardized system to appraise real estate, laying the groundwork for segregationist mortgage lending practices that became institutionalized through the enactment of the National Housing Act of 1934, which applied to lending for single-family mortgages and multi-family housing developments (FDR Library, 2012). Although HOLC was defunded and effectively eliminated in the 1950s, it was considered one of the most successful short-term measures that stabilized the American mortgage market, although the program's benefits primarily supported white homeowners (NCLC Digital Library, n.d.). The Federal Home Loan Bank System remains active and serves an essential role in federal involvement in affordable housing today for both single-family and multi-family housing.

The National Housing Act of 1934 also established the Federal Housing Administration (FHA), an entity that "encourag[ed] improvement in housing standards and conditions by making improved credit facilities available to owners and prospective owners of homes and other property" (3) (Moffeett, 1934). The FHA did this by regulating interest rates and providing mortgage insurance for single-family homes and multi-family housing developments, making housing more affordable, again for mostly white borrowers. Additionally, this Act aimed to support the secondary housing market by establishing the Federal National Mortgage Association, known today as Fannie Mae. The secondary mortgage market is a conduit to encourage private capital investment in mortgage lending companies, thus providing more loan funding for mortgages (Newman, 2009). Fannie Mae and the FHA, although restructured and organized under different administrative powers today, are also New Deal-era elements of federal housing infrastructure that remain today and are both critical institutions for multi-family housing acquisition, rehabilitation, construction, and maintenance.

Federal involvement in programs outside of homeownership for communities across the country began with the Housing Act of 1937, often referred to as the Wagner–Steagall Act. This watershed Act established a variety of critical programs. First, the United States Housing Authority (USHA) was established under the U.S. Department of Interior and took administrative authority over federal housing programs and develop the first public housing. Through the Public Works Administration (PWA), USHA created public housing to support the urban and low-income workforce, which was racially segregated by statute. With the development of public housing, local Public Housing Authorities (PHAs) were established across the country to manage and maintain these properties. Like many smaller cities in the U.S., public housing authorities were the touchstone for McLean County and federal housing policy outside of emergency efforts to stabilize the economy and homeownership during the Great Depression. Although the Housing Authority of the City of Bloomington (BHA) was not established until 1947, a decade after PHAs were authorized, this moment marks a critical point for the diffusion of federal policymaking to the local level, especially for smaller or mid-sized cities (The Housing Authority of Bloomington, 2022).

Another critical element of Housing Act of 1937 was Section 8. In this provision of the Act, the United States authorized rental payments and housing assistance to be paid to private property owners on behalf of tenants. Although this program has been amended many times since 1937, this initial program created the statutory authority for the housing choice voucher program, the most common form of direct federal housing assistance today.

After the Great Depression and WWII, the federal government restructured its housing policy and authority on numerous occasions. USHA was renamed the Federal Public Housing Authority (FPHA) and in 1942 the government placed it under the National Housing Agency (NHA), a new agency established to house all federal housing programs. Then, the federal government renamed the FPHA the Public Housing Administration (PHA) and put it administratively under the Housing and Home Finance Agency (HHFA), established in 1947. From 1947 to 1965, HHFA housed all the major federal housing entities, including The Federal Housing Administration (FHA), the Public Housing Administration (PHA), the Federal National Mortgage Association (Fannie Mae), the Community Facilities Administration, and the Urban Renewal Administration. During this post-war era, under the Truman Administration, housing programs expanded, especially for mortgage insurance and the construction of public housing.

This expansion of housing programs was grounded in the Fair Deal proposals set forth by the Truman Administration. One of the critical policies of this time was the Housing Act of 1949, which set the goal that every American family has access to a "decent home and suitable living environment" as soon as possible (Milgran, 1993). Title I of this Act funded "slum clearance" and "urban redevelopment" programs, often referred to as urban renewal, to address the dilapidated infrastructure of city centers. Although this was not the first "slum clearance" program administered by the federal government, this was the first time it became a centerpiece of housing policy. This indicated a new focus of HUD outside of homeownership and public housing to improve the physical, social, and economic conditions of cities, also known as community development (Thompson, 2006).

Also, during the Truman Administration, housing policy perspective started to shift to engage the private sector in government-assisted and affordable rental housing development, management, and preservation, a trend that has only intensified since (Schill, 1990; Radić et al, 2021). The production of public housing had been relatively slow during the initial decades of the program; only 150,000 public housing units had been built by 1950 (Henig, 1989). Involving the private sector was believed to provide a faster and more flexible way to develop housing for lower-income Americans. As housing policies started to privatize, policymakers also sought to expand the population who lived in public housing. Leading up to the 1950s, federally assisted housing and specifically public housing were targeted to support the working class. New programs aimed to help the elderly, people with disabilities, and non-white low-income individuals and families (Vale & Freemark, 2019). The Section 202 program, created by the Housing Act of 1959, was one of the first programs that initiated the shift to include the private sector and broaden the population assisted by federal housing programs. Through Section 202, HHFA provided financing for private-owner rental housing for elderly and low-income adults (US Department of Housing and Urban Development, n.d.). This program still exists today.

In the 1960s, the decline of large city centers was at the forefront of the American consciousness. With the development of the interstate highway system and the growth of suburbs and white flight, poverty and blight rose in city centers across the country. Racist ideology continued to shape housing policy and lending practices that manifested in cities as economic divestment and segregation. As a result, nearly half of all Standard Metropolitan Statistical Areas (SMSAs) lost population during this same period (Morrison, 1974). Many small or mid-sized cities in the United States, saw this decline in their city centers, but on a much smaller scale. Although McLean County's population was increasing exponentially during this time, most of this growth was outside of the urban core of Normal and Bloomington in the suburbs. This created what Bloomington's Comprehensive Plan (2015) calls "isolated subdivisions in place of connected neighborhoods" (50) (City of Bloomington, 2015). In the city centers of Bloomington and Normal, businesses began to close or move to the outskirts of town to the newly developed Veteran's Parkway, which opened in 1941 (City of Bloomington, 2015).

To address the growing economic distress and housing issues of the 1960s, President Johnson established the U.S. Department of Housing and Urban Development (HUD) as a Cabinet-level department in 1965 through the Housing and Urban Development Act. As a Cabinet-level department, HUD had more power than the HHFA, while maintaining its core functions and mission (Department of Housing, 1966).

During this timeframe MPOs were also established and Federal legislation reinvigorated its focus on regional coordination. In particular, transit and highway policy and planning demonstrated regionalist considerations with the federal government's acknowledgment that traffic cuts across political, municipal, and economic borders (Wachs & Dill, 1999). The establishment of MCRPC as the MPO in 1968 to support the development and maintenance of regional transportation and infrastructure is local evidence of this federal agenda-setting that emphasized regional and comprehensive planning. MPOs during this time also received significant funding from HUD, and thus, were greatly implicated in housing planning and local coordination of federal financing of housing. Additionally, among other federal agencies, HUD required a regional "clearinghouse" to review projects that received federal funding to ensure the projects considered the regional impacts on the community (Hoffman, 1975). This review process covered 150 federal programs. In 1968, HUD certified MCRPC as the Areawide Review Agency for federal funding applications. MCRPC complied with two different regional review requirements through the Circular A-95 review process (McLean County Regional Planning

Commission, 1975).[6] This review process highlights that housing was treated as a regional issue and how MPOs have been critical to housing planning since their establishment in the late 1960s.

In the same year that MCRPC was established, the Civil Rights Act of 1968 was enacted. This Act includes ten parts: Title I addresses hate crimes, Title II through VII addresses the rights of indigenous peoples, Title VIII through IX is known as the Fair Housing Act, and Title X includes the Anti-Riot Act (Rothstein, 2018). The Fair Housing Act has two primary purposes: eliminating housing discrimination and ending segregation in housing (Massey, 2015). The Act initially banned discrimination based on race, color, religion, and national origin. It has been amended to protect people from discrimination based on sex (1974), individuals with disabilities, and families with children (1988). Further legislation and Court rulings have added protections based on sexual orientation and gender identity (2017) (US Department of Housing and Urban Development, n.d.). These characteristics are known as protected classes. Under the Fair Housing Act, the Department of Housing and Urban Development, which was just three years old, was given statutory authority to halt and reverse discriminatory housing practices. Various new tools were set in place to help achieve this goal. For example, new policies banned the refusal to sell or rent to any person under the umbrella of protected classes, banned discriminatory practices regarding rental housing conditions, or in the sale of a home, including discriminatory advertising. Additionally, the Fair Housing Act banned coercing or interfering with individuals' housing rights. Under the Department of Housing and Urban Development, the Office of Fair Housing and Equal Opportunity (FHEO) was created and tasked with administering and enforcing these new policies. Today, 54 regional FHEO offices exist throughout the country.

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[6] These two regional review requirements stemmed from Title IV of the Intergovernmental Cooperation Act of 1968 and Section 204 of the Demonstration Cities and Metropolitan Development Act of 1966.

Another element of the Fair Housing Act is the Affirmatively Furthering Fair Housing (AFFH) rule. The rule is stated under Chapter 45 Fair Housing U.S. Code § 3608, "All executive departments and agencies shall administer their programs and activities relating to housing and urban development (including any Federal agency having regulatory or supervisory authority over financial institutions) in a manner affirmatively to further the purposes of." (CFR, 1968). This mandate intended to require that jurisdictions actively work to reverse segregation and discriminatory practices in housing rather than just stopping or preventing future discrimination and critically involved municipalities and local organizations, like MCRPC, in federal fair housing law. AFFH and fair housing overall have changed significantly since the 1960s, often depending on the political identity of Presidential leadership; however, it remains one of the core missions of HUD and an important element of local affordable housing activities today despite its fluctuating interpretation and implementation since its enactment.

During the 1960s and early 1970s, federally assisted housing production had increased. By 1973, HUD-subsidized housing stock was almost ten times the units in 1950; however, the nature of housing development was different. For example, in 1972, just 15 percent of the housing stock was entirely created, managed, and maintained by government bodies, compared to 88 percent less than ten years earlier in 1964. This can be attributed, in part, to the negative perception of public housing. Although the federal government financially supported public housing development, the maintenance and repair of the units were largely financed by each PHA, which eventually led to slum-like living conditions, especially for large developments in major MSAs like St. Louis and Chicago. This lack of federal funding for public housing maintenance compounded existing issues like geographically isolated locations for public housing and federally financed segregation that created physical and social barriers to economic opportunity for a population already vulnerable to financial constraints.

This led to a moratorium on new funding for federal housing subsidies, under President Nixon in 1973. This indicated a pivotal moment in Federal housing policy to ideologically separate from the stigma of public housing. Policies continued to shift away from multi-family housing production and toward an increased reliance on the private sector. The Housing and Community Development Act of 1974 further institutionalized this changed and decentralized housing by creating one of the most essential tools local governments still use today to support housing: The Community Development Block Grant (CDBG) (Thompson, 2006). CDBG effectively consolidated eight distinct programs, from water and sewer grants to historic preservation grants and public facilities loans (US Department of Housing and Urban Development, 2007). CDBG was created as a formula grant whereby entities with a minimum population receive funding on a non-competitive basis. The funding goes towards a wide variety of housing and community development programs determined by the municipality with restrictions and regulations set forth by the federal government. The creation of CDBG set a precedent for the structure of new housing programs and marked the beginning of what Lawrence Thompson, a long-time senior official at HUD, calls the "modern era" of HUD (2006).

The Housing and Community Development Act of 1974 also included three programs aimed to demonstrate a new political initiative to promote choice in housing, in contrast to the perceived lack of housing choice created by public housing (Name Redacted, 2014). The first two programs provided private or non-profit entities funding to build or rehabilitate housing for low- to moderate-income households. The third was the existing housing "certificate" program known as Section 8, named after Section 8 of the Housing Act of 1937. Through this program, PHAs entered into contracts with HUD to provide a pre-determined number of units for low- to moderate-income households, some of which were units owned and managed by the PHA, known as "project-based," the rest were known as "tenant-based." In "project-based" rental assistance, the subsidy is tied to the unit itself; as families and individuals leave the "project-based" rental assistance program, they no longer have access to that rental subsidy. "Tenant-based" rental assistance, on the other hand, provides a subsidy to the individual or family themselves to find housing on the private market. In both options of the Section 8 program, the rent paid by the tenant is determined by their income and the fair market rent (FMR), or a percent of the median estimate for the gross rent for the community, set by HUD. Tenants paid 30 percent of their income towards housing, and federal subsidy covered the difference between the market rent and the tenant's contribution. Although Section 8 is still used colloquially for rental assistance, it was restructured in 1983 by the Housing and Urban-Rural Recovery Act and then consolidated with other programs in 1998 through the Quality Housing and Work Opportunity Reconciliation Act. Section 8 still includes tenant-based and project-based housing assistance called the Housing Choice Voucher Program (HCV) and Project-Based Assistance, respectively. Rehabilitation and construction of new housing aspects of Section 8 were repealed in 1983. As a result, today, there are two types of Project-Based Assistance: Project-Based Voucher (PBV) and Project-Based Rental Assistance (PBRA). HUD's Office of Multifamily Programs administers PBRA, whereas PHAs administer PBVs.

In the 1980s, decent housing availability and affordability were at a crisis point across the country for homebuyers, homeowners, and renters alike. More people were cost-burdened by housing payments than in the previous decade, with low-income households disproportionately impacted by the affordability crisis: over 70 percent of the lowest-income households paid over

30 percent of their income on housing in 1988 (Wolf, 1990). Housing affordability was a significant issue, but overcrowding and deteriorating housing stock were also significant issues. According to the Congressional Budget Office's Current Problems and Possible Federal Responses Report (1988), one-third of American households experienced at least one of these problems (Congressional Budget Office, 1988). During this time, HUD's funding for low-income housing was slashed; in 1981 funding totaled $30.17 billion and by 1986 that funding dwindled to just $9.97 billion.

Initiatives and programs that supported regionalism were mostly eliminated during this timeframe as well (Mitchell-Weaver & Deal, 2000). Although MPOs remained an element of local planning, other regional planning entities were deregulated, defunded, or eliminated, creating less regional coordination that characterized the Reagan-era of federal policymaking for planning efforts and effectively isolated MPOs in their efforts. In 1979, 39 federal programs supported regional planning at the metropolitan and local levels of governance, and in 1984 there was only one program that maintained previous funding levels. In addition, programs outside of transportation planning were significantly reduced or terminated completely (McDowell, 1984).

Homelessness during this timeframe grew visibly and significantly compared to previous eras, and services and programs to assist individuals experiencing homelessness became integral to HUD's mission during the 1980s and 1990s. Prior to this timeframe, homelessness was scarcely researched, addressed in policymaking, or conceptualized by the public, although individuals and households had experienced homelessness (Shlay & Rossi, 1992). The lack of decent housing stock and the increased cost of living paired with stagnant wages contributed to the housing crisis of the 1980s and the rise of homelessness. Literature also points to the converging of other factors that contributed to the growing number of people with no housing options, including, but not limited to, the dismantling of public mental health facilities, the destruction of Single Occupancy Rooms (SROs) during the implementation of urban renewal, and growing substance abuse in the pubic (Axelson & Dail, 1988; Susser, 1996). To address this, the Homeless Housing Act was adopted in 1986, which created the Emergency Shelter Grant program and the transitional housing demonstration program, the first programs administered by HUD targeted individuals experiencing homelessness. In addition, the Stewart B. McKinney Homeless Assistance Act, now known as the McKinney-Vento Act, was passed later that year which expanded this program and created new programs to address homelessness (National Coalition for the Homeless, 2006).

Aside from programs aimed to address homelessness, 1986 was another watershed moment in affordable housing history. Through the Tax Reform Act of 1986, the Low-Income Housing Tax Credit (LIHTC) program was created, the largest funding source for affordable housing development and rehabilitation today. Through this program, State Housing Finance Agencies (HFA) receive a certain amount of funding from HUD based on their population size and a dollar amount set each year. For example, in 2021, each state received $2.8125 per capita. HFAs then allocate funding as a tax credit to affordable housing developers. Then, developers typically sell these credits to investors in exchange for direct financing of the housing project. Investors effectively receive a dollar-for-dollar reduction in federal taxes over ten years, while developers receive up-front funding to construct or rehabilitate housing for low- to moderate-income households (Keightley, 2021). The subsidy provided to the developer is outlined in the Internal Revenue Code (IRC). It is approximately equal to either 30 percent or 70 percent of the LIHTC development's eligible basis, which is roughly the cost of the development minus the value of the land. The 30 percent subsidy is known as the 4 percent tax credit, and the 70 percent subsidy is known as the 9 percent tax credit.[7] Housing developed through this program including affordable units with affordability contracts. Once the contract ends, either after 14 years or 30 years, the property can be converted to market-rate housing, posing problems for the sustainability of long-term affordability of what is now the largest provider of affordable housing in the United States.

Housing policies in the 1990s continued to devolve to local decision-makers as federal policy consolidated competitive grants into formula block grants and began to re-encourage community-wide coordination at the local level. In 1990, the Cranston-Gonzalez National Affordable Housing Act (NAHA) was passed and authorized various new programs, including the HOME Investment Partnership Program under Title I and the Housing Opportunities for Persons with AIDS (HOPWA) program under Title VIII (Code of Regulations, 1990). These programs, like the existing CDBG program, are formula grants that award funding to eligible municipalities on a non-competitive basis. Population size, housing needs, and health necessities determine eligibility. The HOME Investment Partnership Program provides financing for homeownership and homebuyer support and funding for the acquisition, rehabilitation, or construction of rental housing and rental assistance (Jones, 2021). It also furthered the push to include non-government entities in housing by requiring jurisdictions to allocate 30 percent of their funds to community housing development organizations (CHDOs) for the acquisition,

[7] The U.S. Treasury calculates the tax credit awarded to developers to allocate to investors. It includes the credit period length (up to 10 years), the desired subsidy level (either 30 percent or 70 percent), and the current interest rate. The tax credit percentage is updated every month and varies by general market conditions. Recent legislation has set a tax credit floor so tax credits cannot be below the 4 or 9 percent that generates the subsidy. In Illinois, the four percent tax credit is paired with tax-exempt bond financing and delivers up to a 30 percent subsidy for affordable housing development and is offered on a non-competitive basis. This program is typically used for rehabilitation projects. The 9 percent tax credit is a highly competitive program that supports new construction and rehabilitation. Properties were initially contractually required to maintain affordability for 15 years, which has been extended to 30 years, although properties can exit the program under certain circumstances after the initial 15-year affordability period.

construction, or rehabilitation of affordable housing. Communities without CHDOs are required to return that portion of their HOME funds. HOPWA specifically targets supporting low-income people living with HIV or AIDS and their families with rental assistance, mortgage assistance, utility costs, as well as for communities to fund social services and the acquisition, rehabilitation, or construction of affordable housing (Bennett & Bernstine, 2017). NAHA also included a provision that outlined the state and local planning process for Community Planning and Development (CPD) programs, which at this time included CDBG, HOME Investment Partnership, HOPWA, and the Emergency Shelter Grant programs. This planning process is called the Comprehensive Housing Affordability Strategy (CHAS) or simply the consolidated plan. These plans must be developed at both the state and local levels for any entities administering the CPD programs.

In 1994, the McKinney-Vento Homeless Assistance Act was amended and authorized the concept of the Continuum of Care (CoC) planning process. This process was designed to promote "communitywide commitment to the goal of ending homelessness" by requiring communities to submit one Continuum of Care application for homelessness assistance funds from HUD, rather than each entity across the country to apply to competitive funding opportunities separately (Code of Federal Regulations, 1994). These CoC programs include the Supportive Housing Program (SHP), the Shelter Plus Care (S+C) Program, and the Single Room Occupancy (SRO) Program (Office of Community Development, 2009). However, Congress did not authorize the CoC program until the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH Act) in 2009 (Blasco, 2015). This legislation marked the first overhaul of HUD's response to homelessness. It expanded the Emergency Shelter Grant program and renamed it the Emergency Solutions Grant program. Many organizations that served households experiencing homelessness began to leverage new technology to electronically track programs targeted to serve individuals experiencing homelessness. After conducting research, HUD required CoCs to manage a Homeless Management Information System (HMIS), and as technology advances, new standards for security, database management, and other technical requirements have been published by HUD regularly since (Poulin, et al, 2008).

The programs and policies listed above all have informed the creation of the Municipal Housing Guide, whose purpose is to provide information to municipalities and affordable housing developers in McLean County regarding multi-family affordable housing resources. Resources supporting affordable housing encompass a vast and intersectional range of federal, state, and private sector programs. As outlined above the programs and policies that guide affordable housing development have evolved significantly since the first federally assisted housing was developed in 1918.

Local Context for the Municipal Housing Resource Guide

Affordable Housing Definition

Affordable housing is often conflated with public housing. Although this type of housing is under the umbrella of affordable housing, it is by no means the only type. Affordable housing encompasses many housing types, including single-family housing, multi-family apartments, public housing, condominiums, manufactured housing, assisted-living facilities, tiny homes, specialized housing for veterans and individuals with disabilities, and cooperative housing. However, this diversity in housing type is just housing until the cost of living there is considered.

Affordable housing, as defined by the U.S. Department of Housing and Urban Development (HUD), is when an individual or household pays no more than 30 percent of their gross, or pre-taxed, income for housing and housing expenses, which includes, but is not limited to utilities and homeowners or renters' insurance. The HUD definition of affordability applies to federally assisted housing programs, whereby households residing in HUD supported housing pay the set affordable percent of their income towards rent, and the difference between the operating cost or fair market rent and the amount paid by the tenant is covered through the housing assistance program.

In 1981, Congress adopted the 30 percent precedent for affordability, which it raised from 25 percent, a federal standard set in the 1960s (US Department of Housing and Urban Development, 2017). Initially, affordability was based on the idea that housing should cost no more than one week's monthly salary or 25 percent of your monthly income. However, the Regan Administration decreased government spending across all government sectors, and federal housing programs were no exception. As a result, Congress sought to reduce expenses on federally assisted housing. It achieved this by changing the affordability standard to 30 percent, which effectively raised the cost of living for households residing in federally assisted housing and changed program standards for housing assistance.

By HUD's definition, affordable housing is not confined to housing developed, maintained, or managed through government entities or federally assisted housing. In addition, market-rate affordable housing, also known as naturally occurring affordable housing or NOAH, can also be affordable housing if market conditions allow for households to pay no more than 30 percent of their income towards their rent or mortgage. Although the "30 percent rule" is somewhat arbitrary, this definition is widely accepted as the standard for advocates for affordable housing and beyond (Herbert et al., 2017).

Given these criteria, affordable housing is an expansive topic. The Municipal Housing Resource Guide could not feasibly cover all programs for affordable housing. For the purpose of the Guide, I targeted programs that support affordable multi-family housing, which the Regional Housing Advisory Committee determined.

Regional Housing Initiative

The Municipal Housing Resource Guide concept stemmed from the Regional Housing Initiative, an initiative created and led by MCRPC. The activities of the Regional Housing Initiative are carried out by the Regional Housing Advisory Committee, an inter-jurisdictional committee that was established in 2018. This Committee has two working committees: The Staff Committee and the Affordable and Supportive Housing Committee (ASH). The Staff Committee connects local entities with state and federal programs and policies for housing as a whole. The Staff Committee primarily includes governmental bodies, such as representatives from the Town of Normal, the City of Bloomington, and the Bloomington Housing Authority (BHA). The Affordable and Supportive Housing Committee includes these entities and local non-profit agencies involved in supportive housing or social services, such as MarcFirst, Mid Central Community Action Agency (MCCA), and Chestnut Health Systems. This group focuses primarily on housing issues for low-income populations or individuals experiencing homelessness.

There are two key elements of the Regional Housing Initiative that makes it unique to previously established housing focused organizations in McLean County: its regional focus and its interjurisdictional nature. By federal mandate, local governments have engaged in regional planning efforts for decades, and regionalism has been integrated into American governance and urban planning since the turn of the century (Bromley & Daniels, 2001). However, as outlined above in the history of federally assisted housing, federal legislation has both bolstered and reduced regional coordination throughout the 20th century. Only in the last few decades has it returned to prominence.

As Olberding (2002) outlined, there are generally two approaches to regionalism. The first category is characterized as “broad sweeping” regionalism; agencies and local governments attempt to coordinate many or all services through this approach (Olberding, 2002). This approach is challenging to implement and has had little success in its application to local governance in the United States. The other approach to regionalism involves a more singular focus whereby entities seek to coordinate a few or one service within a region. The Regional Housing Initiative’s efforts fall under this second category of regionalism.

Proponents of regionalism have linked metropolitan fragmentation, or the lack or regional cooperation and coordination, with increased socioeconomic inequality. Regional planning provides an avenue to connect otherwise socioeconomically disparate yet geographically proximate entities. Additionally, regional coordination and planning reduce the duplication of activities (Greene, 1967). However, as regionalism lost its prominence in federal metropolitan planning initiatives and decision-making powers during the 1980s, areawide coordination fell to the wayside, slowing or ending federal efforts to support regionally connected communities. Rather than being a leader in regional coordination, MPOs during this period transitioned to a depository of plans and projects created by other entities. This effectively made MPOs reporters of federally funded projects rather than a unifying regional voice (McDowell, 1984).

The decline of regionalism can be attributed to shifting federal priorities and the global context for cities. At the national level, decentralizing political power from the federal government to state and local governments became a top priority for conservative policy, contributing to a myriad of changes at the local level. This political devolution and drastic budget cuts led to increased fiscal competition between local government entities and resource hoarding (Freemark et al., 2020). The pressures of an increasingly global economy only exacerbated the pressure for American cities to compete economically and think individualistically rather than regionally. The decentralization of governing power has been the subject of a long-standing social science and political debate (Hawkins & Dye, 1970). Although the question of the most favorable level of devolution and fragmentation of the United States local government is yet to be resolved in the scholarly or practical world, regionalism has regained prominence in planning and policy. This revival began in the 1990s and targeted regional strategies to coordinate a general service across local governments (Swanstrom, 2001).

Non-mandated regional coordination has grown as a popular strategy of governance and community building as well, and this is evident by the growing number of regionally focused efforts in McLean County. This includes the creation of McLean County's first regional Greenways Plan in 1997, the development of the first regional health plan in 2016, the creation of BN Advantage, a regional economic development initiative developed in the 2010s, and the Regional Housing Study published in 2017. The Regional Housing Initiative itself is further evidence of regionalism regaining a foothold in governance.

The other critical element of the Regional Housing Initiative is its inter-jurisdictional nature. This allows the group to leverage each committee member's unique and specific professional expertise to inform the whole group and, by extension, promote a robust housing environment for the community. Although each member is involved in housing in their usual job functions, given the complexity of affordable housing outlined above, each committee member brings a unique perspective and expertise to the discussion on affordable housing. This also helps to inform and coordinate the planning efforts of the City of Bloomington and the Town of Normal to create a more cohesive regional housing plan.

As a Stevenson Fellow, developing the Municipal Housing Resource Guide aligns with the interjurisdictional nature of the Regional Housing Initiative. Stevenson Fellows are Illinois State University Graduate Students in the Applied Community and Economic Development (ACED) program who are placed at different organizations across the country. Thus, Fellows provide their placement organizations with the opportunity to leverage a student's unique perspective, experiences, and education to inform organizational activities. Organizations hosting Fellows symbiotically provide the Fellow with valuable professional work experience and practical, on-the-job training to support the Fellows career advancement and educational growth.

MCRPC staff outlined three focus areas that a Stevenson Fellow would engage with during an 11-month fellowship. The three areas include regional planning, transportation planning, and housing topics. Duties related to regional planning include research, data gathering, and planning elements pertaining to workforce development, economic development, aging and outmigration, housing, healthcare, education, broadband, infrastructure, environmental planning, land use, and transportation. Duties related to transportation planning include outreach, writing chapters for the Metropolitan Transportation Plan, researching transportation services for disadvantaged populations, assisting with survey development, and the Smart Cities' initiatives. Finally, the duties related to housing topics include assisting with housing committees and researching housing topics, such as the Affirmatively Furthering Fair Housing rule (AFFH) as well as the Municipal Housing Resource Guide (Bostic & Acolin, 2017).

Development of the Municipal Housing Resource Guide

The Federally Assisted Housing Landscape Today

The US Department of Housing and Urban Development, as described above, evolved from a complicated web of restructured agencies and new bureaucracies. Although the general structure of HUD and its associated offices has remained stable in recent decades, HUD housing programs are widely considered to be a relatively complicated controversial policy issue. In this section, I outline the departments under HUD, other federal, and non-federal agencies involved in multi-family housing resources. Additionally, I highlight the existing key institutions in McLean County that support affordable housing.

Under HUD, there are eight central program offices: the Office of Public and Indian Housing, the Office of Housing/Federal Housing Administration, the Office of Community Planning and Development, the Office of Lead Hazard Control and Healthy Homes, the Office of Policy Development and Research, as well as Executive Offices, and Administrative Support Offices which encompasses the Government National Mortgage Association (Ginnie Mae) (US Department of Housing and Urban Development, 2021). Through these program offices, various funding mechanisms are employed to support affordable housing programs; these can be broken down into four general categories: competitive grants, formula grants, rental subsidies, and loan programs.

Competitive grants are available by application to units of government and non-governmental agencies. These grants are typically designed to fund specific programmatic activities and are awarded based on application merit and community need. Competitive grants can and do change relatively frequently. Formula grants are non-competitive funding opportunities generally awarded every federal fiscal year. These grants are allocated using a calculation that often includes population size, quantifiable need, or a combination of those metrics. For example, for the United States Department of Housing and Urban Development's Community Planning and Development (CPD) formula grants, municipalities that sit above the population threshold of 50,000 people are considered entitlement entities and receive funding directly from HUD. However, some formula grant programs administered by HUD also require the community to meet a level of quantifiable need. For communities beneath that population threshold and/or community need metric, the State government serves as the entitlement jurisdiction that receives and distributes the funds throughout the state. These formula grants are generally stable programs, although the amount of funding for each program can vary from year to year and from administration to administration.

In McLean County, both the City of Bloomington and the Town of Normal are considered entitlement communities due to their populations; however, they do not receive all formula grants administered by HUD because they do not meet the threshold of community need. For example, the Housing Opportunities for Persons with AIDS/HIV (HOPWA) requires a community to have at least 2,000 people with HIV/AIDS to receive the HOPWA block grant directly from HUD, which neither Bloomington nor Normal does. Bloomington and Normal also do not receive Home Investment Partnership Funds based on the criteria outlined by HUD, which includes six different metrics for housing needs ranging from incidence of poverty to cost of producing housing. Under HUD, there are ten regional offices and 64 field offices to help implement these programs and provide support to the various other non-HUD entities involved in HUD programs. State governments, local entities, banks, and private developers are critical to implementing HUD programs.

Aside from HUD, two federal agencies support multi-family affordable housing activities: The United States Department of Veterans Affairs (VA) and the United States Department of Agriculture (USDA). Because the VA primarily offers single-family housing programs, such as single-family mortgage loans, down payment assistance, foreclosure prevention options, and grants for adapting single-family housing, I do not fully outline the VA's programs due to the scope of the Municipal Housing Resource Guide. However, the VA is worth mentioning because it is involved in HUD programs through specialized rental assistance programs targeting veterans experiencing homelessness through the Veterans Affairs Supportive Housing (VASH) program. This program connects veterans experiencing homelessness to local public housing authorities' allocation of housing choice vouchers (HCV) and case management provided by the Department of Veterans Affairs.

The USDA is a critical component of the federally assisted multi-family housing context. The USDA was created in 1862 to support agriculture and rural development when the United States was largely agrarian and rural. Today, the USDA includes eight mission areas with 29 agencies that implement various programs and services ranging from support for farm operations to food, nutrition, consumer services, and natural resources stewardship and conservation. The USDA's Rural Development (RD) is one of the mission areas of the USDA that encompasses three agencies, one of which is the Rural Housing Service. RD supports a diverse array of initiatives supporting broadband expansion, infrastructure development or repair, community building, mortgage origination, etc. RD includes 47 state offices and almost 500 field offices scattered across the United States and its territories. There are eleven field offices in Illinois; the closest field office to Bloomington and Normal is approximately 37 miles away in Pontiac, Illinois (US Department of Agriculture, 2022).

At the state level, state housing finance agencies (HFAs) are government entities that each state has chartered to meet the affordable housing needs of its constituents. These entities started to spring up during the 1960s as federal funding for new housing for low- to moderate-income households grew and housing initiatives decentralized (Committee on Housing and Urban Development, 1974). Although HFA activities and their general characteristics vary from state to state, a few common threads tie HFAs together. First is that the Governor appoints the board of directors for each HFA; thus, the activities can be swayed by the political agenda of state executive leadership. Second, each HFA plays a critical role in allocating HUD programs like the CDBG and HOME block grant programs, setting policy and administering tax credit programs, housing bond and credit programs that support multi-family affordable housing development, as well as single-family lending, blight reduction programs, and community development programs, among other activities (National Council of State Housing Agencies, 2021). In Illinois, the Illinois Housing and Development Authority (IHDA) is the HFA. Other state-level entities involved in affordable multi-family housing in Illinois include the Governor's Office of Management and Budget, the Illinois Finance Authority (IFA), the Illinois Department of Public Health (IDPH), the Illinois Department of Human Services (IDHS), and the Federal Home Loan Bank of Chicago, which serves both Illinois and Wisconsin.

The Governor's Office of Management and Budget allocates the volume cap for private activity bonds (PABs) among the different entities within the state, including municipalities seeking PABs that can be employed to develop affordable housing and other state authorities who administer PABs. One such agency is the Illinois Finance Authority (IFA) which was created in 2004 by Illinois State statute to consolidate various state entities. While IFA does not only focus on affordable housing, it is one of the largest issuers of private activity bonds, which non-profits and private organizations can leverage to develop housing for seniors, students, and low- to moderate-income households, among other economic development activities (Illinois Finance Authority, 2022).

The Illinois Department of Public Health (IDPH) is another state entity that is not primarily involved in affordable housing but is still engaged in its activities. The involvement of IDPH in housing demonstrates how intersectional housing exists in other policy issues, such as health. IDPH is primarily involved in housing by setting standards for nursing homes and assisted living facilities and other special services for housing individuals with health needs, such as developmental disabilities or individuals with HIV or AIDS, with funding from HUD. Specifically, IDPH is the state-level agency that receives the state allocation of Housing Opportunities for Persons with HIV/AIDS (HOPWA), a HUD block grant program (Illinois Department of Public Health, 2022).

The Illinois Department of Human Services (IDHS) is another example of a non-housing-specific entity involved in housing programs. IDHS assists in administering and monitoring programs targeted toward individuals and families experiencing or at risk of experiencing homelessness, including HUD's Emergency Solutions (ESG) block grant program and supporting local Continuum of Care entities (Illinois Department of Human Services, 2022).

As highlighted in the previous section, the Federal Home Loan Bank of Chicago is a legacy of the New Deal Era. The Federal Home Loan Bank of Chicago (FHLB) covers Illinois and Wisconsin and is one of 11 district FHLBanks chartered by the U.S. Congress. The FHLB of Chicago supports mortgage lending and community investment by providing low-cost financing and grants to affordable housing developers in partnership with FHLB member banks and insurance companies. So, while the FHLB of Chicago does not directly lend to entities developing, preserving, or maintaining affordable housing, FHLB member banks and insurance companies can leverage FHLB programs to support local affordable housing efforts (Federal Home Loan Bank of Chicago, 2022).

Another lending institution critical to the national affordable housing landscape is Community Development Finance Institutions or CDFIs. The CDFI industry, first introduced in Chicago in 1973, are private entities that provide similar services as traditional banks but are mission-driven. There are four general sectors for CDFIs: Community Development Banks, Community Development Credit Unions, Community Development Loan Funds, and Community Development Venture Capital Funds. These sectors support a variety of lending and financial needs for low-income people ranging from originating loans for small businesses to second-chance bank accounts for individuals with poor checking account history and providing funding for affordable housing development (Opportunity Finance Network, 2021). Although there are no CDFI's in McLean County, CDFI's often have broad service areas, and there have been loans originated by CDFI's in McLean County. Data from the Opportunity Finance Network's CDFI coverage map indicates that most CDFI lending in McLean County supports consumer lending or microenterprises and all lending has occurred in the Bloomington-Normal urbanized area (Opportunity Finance Network, 2021). Despite their limited reach in McLean County, CDFI's provide valuable opportunities to expand affordable housing.

Overall, HUD plays a central role in providing funding, technical assistance, and general guidance for affordable housing development, maintenance, and management, however there are many other public and private entities that are critical to the multi-family affordable housing sector.

Best Practices and Resources to Inform the Municipal Housing Resource Guide

There are many existing practical and academic resources for understanding and leveraging programs for housing, including numerous government agencies and many national, state, and regional non-governmental entities. In addition, many non-governmental agencies track housing programs, educate the public on these resources, and advocate for changes to housing policies. See Figure 1 for a list of these advocacy entities. Note that these are entities that generally do not provide direct housing services. However, many national-level housing entities conduct advocacy and education and directly develop, finance, manage, or maintain affordable multi-family housing. These entities are often Community Development Finance Institutions or CDFIs. Because there are over 300 CDFIs across the country, I do not include them in this figure. However, the Opportunity Finance Network provides a tool that locates CDFIs across the country. That resource can be found at https://ofn.org/cdfi-locator.

Figure 1: Non-Governmental Entities that Support Multi-Family Housing Programs

National	State (Illinois) or Regional (Midwest)
Center on Budget and Policy Priorities	Housing Action Illinois
Housing Assistance Council	Illinois Association of Housing Authorities
National Association of Counties	Illinois Housing Council
National Coalition for the Homeless	Supportive Housing Providers Association
National Council for State Housing Agencies	
National Community Reinvestment Coalition	
National Low-Income Housing Coalition	
ShelterForce	
The Urban Institute	

At the national level, the National Low-Income Housing Coalition (NLIHC) publishes an annual *Advocates' Guide to Housing and Community Development* that provides general information on federal housing programs and policies and informs readers about the legislation changes that impact housing programs. This extensive document also includes advocacy resources to equip organizations and individuals with the context for housing policy and organizing, among other topics. This resource is critical to the Municipal Housing Resource Guide because it clearly outlines which federally assisted housing programs have been funded, which programs are not funded, and the changing requirements they may have from year-to-year. Tracking which programs are funded or accepting new program participants is crucial because of the long-term nature of housing funding and the influence of federal policy priorities that change with every administration. For example, federally assisted housing programs may still be active due to the long-term nature of housing contracts and funding mechanisms, but are not accepting new program participants. Alternatively, there may be statutorily established programs, but that did not get allocated funding. Because of this, housing programs may appear to be an available resource to developers or municipalities, but they are not funded or receiving new applications. Thus, it is critical to review NLIHC's Advocate's Guide to filter inactive programs out of the Municipal Housing Resource Guide.

Overall, the *Advocates' Guide to Housing and Community Development* is a helpful and comprehensive resource that provides a great deal of information for housing professionals. However, this resource alone does not offer the Regional Housing Staff Committee with the tools to understand resources relevant to McLean County because its ultimate purpose is to serve as a primer for advocates rather than a guide to support the application process for these programs. Additionally, it is extensive; the federal fiscal year 2021 Advocates' Guide was 566 pages, making it difficult to navigate for day-to-day use (National Low Income Housing Coalition, 2021). Ultimately, I use the NLIHC's Advocates' Guide information to help inform the Municipal Housing Resource Guide.

Another national-level resource available to inform the Municipal Housing Resource Guide is the United State Department of Agriculture's (USDA) published resource guides and fact sheets on USDA programs and HUD's 2020 "Programs of HUD" document. The USDA has published a wide variety of resource guides that include information on USDA programs in English and Spanish. There is not currently a guide specifically about USDA housing resources; however, housing programs are listed in these guides, most prominently in their "COVID-19 Federal Rural Resource Guide" (US Department of Agriculture, 2019). This guide was initially published in April 2020 and was updated in July 2020. Although HUD's programs document is not current, it provides helpful and brief descriptions of all programs administered and funded by HUD. In addition, it provides a point in time reference for which programs of HUD are active or inactive and the legal authority of each program (US Department of Housing and Urban Development, 2020).

I also use government budgets as a resource to develop the Municipal Housing Resource Guide. Because the *Advocates' Guide to Housing and Community Development* covers the Federal budget for housing assistance programs, the Illinois State Budget is the primary budget document that is helpful to inform the contents of the guide. The Illinois government fiscal budget is typically submitted by the Governor to the State Legislature on the third Wednesday of February to be voted on in the Spring, typically in April. The state fiscal year begins on July 1 and runs through the next calendar year to June 30 every year (StateScape, 2022). Therefore, the budget used to develop the Municipal Housing Resource Guide is the fiscal year (FY) 22, which runs from July 1, 2021, through June 30, 2022.

The State budget, in many ways, is dependent on the Federal budget because state agencies administer many federal programs. For example, the Illinois Housing and Development

Authority (IHDA) administers some funding from the HOME Investment Partnership Program for non-entitlement communities. The total amount of funding available for the HOME Investment Partnership Program is dependent on Federal appropriations rather than individual state policy making or state taxes. However, many state-level programs are administered and allocated funding independently from the Federal fiscal process. For example, the state's real estate transfer fee, which funds the Illinois Affordable Housing Trust Fund (IAHTF) and state-issued bonds, which support the low-income housing tax credit (LIHTC) programs, are some of the state programs that are external to the Federal budget (National Low Income Housing Coalition, 2022).

The other major resource that is used to create this Guide is the Metropolitan Mayors Caucus' "Housing + Community Development Municipal Resource Guide" in 2019 (Metropolitan Mayors Caucus, 2019). The guide includes resources that are outside of the scope of MCRPC's guide, such as programs targeted for single-family and homeownership support. However, it is still a critical resource to review the format and structure of the Municipal Housing Resource Guide for McLean County. Below is the presentation of the The Municipal Housing Resource Guide: Multi-Family Housing Resources developed for this capstone project.

MUNICIPAL HOUSING RESOURCE GUIDE

Multi-Family Housing Resources

MCLEAN COUNTY | DECEMBER 2021

MCRPC
McLEAN COUNTY
Regional Planning Commission

REGIONAL HOUSING INITIATIVES

Overview

This guide is intended to provide a point-in-time overview of the programs available to support affordable housing development and preservation in McLean County. The first section of the guide outlines formula grant programs available to municipalities. The second section is organized by the funding source and outlines programs for multi-family affordable housing development and preservation. Previous resource guides related to municipal resources include the Housing + Community Development Municipal Resource Guide (2019) developed by the Metropolitan Mayors Caucus as well as the Rural Resource Guide for McLean County (2020), developed by the McLean County Regional Planning Commission (MCRPC).

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Formula Grants

Formula grants are non-competitive funding opportunities that are generally awarded every Federal fiscal year (October 1st through September 30th of the next calendar year).[1] These grants are allocated using a formula that often includes population size, quantifiable need, or a combination of those metrics. For United States Department of Housing and Urban Development's (HUD) Community Planning and Development (CPD) formula grants (i.e. CDBG), municipalities that sit above the population threshold of 50,000 people are considered **entitlement entities** and receive funding directly from HUD. In McLean County these jurisdictions include the City of Bloomington and the Town of Normal. For communities beneath that population threshold, the State government serves as the entitlement jurisdiction who receives and distributes the funds. In Illinois, State entities that distribute **non-entitlement** formula grants include the Department Of Commerce And Economic Opportunity (DCEO), the Illinois Housing and Development Authority (IHDA), and the Department of Human Services (IDHS). After applying and receiving these funds from the designated state entity, non-entitlement jurisdictions have flexibility to use these grants within federal program guidelines. In McLean County, 20 cities and villages have populations below 50,000 people and are eligible for non-entitlement funds.

Program Title:	**Community Development Block Grant (CDBG) Funds**		
Program Type:	Formula Grant for Entitlement & Competitive Grant for Non-Entitlement Communities	**Organization**:	HUD & DCEO
Who can apply?	Municipalities or counties; can be in partnership with for-profit or not-for-profit organizations	**Application Date:**	Annual
Description & Purpose:	**Entitlement Communities**: Funds for code enforcement, demolition, homebuyer assistance and residential rehabilitation. New affordable housing development must be carried out by Community Housing Development Organizations. **Non-Entitlement Communities**: Funds are available through the Illinois Department of Commerce & Economic Opportunity (DCEO). There are 4 components to this program: 1) Housing Rehabilitation 2) Public Infrastructure 3) Disaster Response 4) Economic Development. For more information about CDBG for non-entitlement communities visit the DCEO website here. Staff contacts for non-entitlement CDBG funding can be found here. **Section 108 Loan**: This program provides Community Development Block Grant (CDBG) recipients with the ability to leverage a portion of their annual CDBG grant allocation to access low-cost, flexible and federally guaranteed loans for economic development, housing, public facilities, and infrastructure projects. For more information click here.		
Target Population:	Low- to Moderate- Income Households	**Terms & Requirements:**	Over a 1, 2, or 3-year period, as selected by the grantee, not less than 70 percent of CDBG funds must be used[2]
Program Link:	CDBG HUD Exchange Website Region V CPD Website	**Contacts:**	Donald G. Kathan, Director of the Region V CPD Field Office[3] | P: 312-913-8713 | Donald.G.Kathan@hud.gov

Program Title:	Community Development Block Disaster Recovery Program (CDBG-DR) Funds		
Program Type:	Formula Grant for Entitlement & Non-Entitlement Communities	**Organization:**	HUD & DCEO
Who can apply?	Municipalities or counties	**Application Date:**	Appropriated by Congress after a Presidentially declared disaster
Description & Purpose:	**Entitlement Communities:** Funds are typically awarded by Congress in supplemental appropriations after a disaster occurs to help cities and counties to recover from Presidentially declared disasters. Funds may be used for similar activities to CDBG, including housing development and rehabilitation, economic development, acquisition and rehabilitation of property, and other activities, intended to principally serve low- and moderate-income persons.[4] **Non-Entitlement Communities:** CDBG-DR Funds are available for non-entitlement communities through the Illinois Department of Commerce & Economic Opportunity (DCEO) following a disaster as declared by the Governor. Staff contacts for non-entitlement CDBG funding can be found here.		
Target Population:	Low- to Moderate- Income Households	**Terms & Requirements:**	Dependent on application
Program Link:	CDBG-DR HUD Exchange Website	**Contacts:**	Donald G. Kathan, Director of the Region V CPD Field Office | P: 312-913-8713 Donald.G.Kathan@hud.gov

Program Title:	CoC: Continuum of Care Program[1]		
Program Type:	Competitive Grant	**Organization:**	HUD and IDHS
Who can apply?	Nonprofit organizations, State and local governments, instrumentalities of local governments, and public housing agencies.	**Application Date:**	Annual; local competition CoC deadline typically is early fall and collaborative application is due to IDHS typically in late fall
Description & Purpose:	This program aims to provide permanent housing, transitional housing, supportive services, Homeless Management Information System (HMIS), and in some cases, homelessness prevention. Programs managed through CoCs include Transitional Housing (TH), Safe Haven (SH), Rapid Re-Housing (RRH), Permanent Supportive Housing (PSH), Other Permanent Housing (OPH), and Homeless Prevention Program.		
Target Population:	Individuals and families who are in imminent danger of eviction, foreclosure or are currently homeless are referred by the Single Point of Entry System.	**Terms & Requirements:**	Grant funding should be expended within a three-year period from the date of the executed grant agreement.
Program Link:	HUD Exchange Website - CoC	**Contacts:**	Josalyn Smith, Program Manager, State of Illinois ESG | 100 S Grand Avenue East Springfield, IL 62704 P: 217-524-8612 | DHS.ESG@illinois.gov

Program Title:	Emergency Solutions Grant (ESG)		
Program Type:	Formula Grant	**Organization:**	HUD funded, IDHS administered
Who can apply?	States, metropolitan cities, & urban counties; funds can be sub-granted to private nonprofit organizations.	**Application Date:**	Annual; HUD awards ESG funds via an annual award notice released by IDHS for CoCs to identify recommended subrecipients. Subrecipients (local government entities) apply directly with IDHS.
Description & Purpose:	ESG funds may be used for five program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and Homeless Management Information System (HMIS). Grantees must consult with the Continuum(s)		

[1] Although the CoC program is not a formula grant, it is listed here due to the complexity of the program and the important role CoCs have in addressing multi-family housing and services for individuals experiencing homelessness.

	of Care to determine how to allocate funds, in McLean County this entity is the Central Illinois Continuum of Care (CICoC).		
Target Population:	Individuals who meet the "homeless" definition in Title 24 CFR 576.2	**Terms & Requirements:**	Up to 7.5% of a recipient's allocation can be used for administrative activities. Grant period is 12 months, funds not used during this time may be rolled into the next year. All funds must be expended within 2 years of the grant agreement signing date. **ESG funding requires an equal match (in-kind or cash)**.
Program Link:	ESG HUD Exchange Website	**Contacts:**	Josalyn Smith, Program Manager, State of Illinois ESG |100 S Grand Avenue East Springfield, IL 62704 P: 217-524-8612 | DHS.ESG@illinois.gov

Program Title:	**HOME Investment Partnership Fund**		
Program Type:	Formula Grant	**Organization**:	HUD & IHDA
Who can apply?	States, cities, urban counties, and consortia	**Application Date:**	Annual
Description & Purpose:	This program grants funding to states and units of general local government to implement local housing strategies designed to increase homeownership and affordable housing opportunities for low and very low-income Americans. Participating jurisdictions (PJs) must reserve a minimum of 15% of its annual allocation for housing of HOME funds for housing owned, developed, or sponsored by a Community Housing Development Organization (CHDO).		
Target Population:	Individuals or households with 60% AMI or below	**Terms & Requirements:**	Funds must be committed to a project within two years and must be expended within five years of receipt of funds. Participating jurisdictions (PJs) **must match funds with a 25% permanent contribution** to affordable housing activities.
Program Link:	HOME HUD Exchange Website	**Contacts:**	Donald G. Kathan, Director of the Region V CPD Field Office | P: 312-913-8713 Donald.G.Kathan@hud.gov

Program Title:	Housing Opportunities for Persons With AIDS (HOPWA)		
Program Type:	Formula Grant & Competitive Grant	**Organization**:	HUD & IDPH
Who can apply?	Metropolitan statistical areas with more than 500,000 people and at least 2,000 HIV/AIDS cases and States with more than 2,000 HIV/AIDS cases outside of eligible metropolitan statistical areas qualify for the formula grant allocation.[5]	**Application Date:**	Annual
Description & Purpose:	Funds support the establishment of stable housing, reducing risk of homelessness, and improving access to healthcare and supportive services. 90% of federal HOPWA funds are allocated via formula grants. The remaining 10% of HOPWA funds are distributed through a competitive process to states, localities, or nonprofit organizations with priority given by congressional authority to the renewal of expiring permanent supportive housing project grants. If funds remain after renewals, they are distributed under the annual Notice of Funding Availability (NOFA) competition for Special Projects of National Significance or to new long-term projects for entities that do not qualify for the formula grant.[6]		
Target Population:	Low- to Moderate-Income (at or below 80% the area median income) persons living with HIV/AIDS and their families	**Terms & Requirements:**	Grant funding should be expended within a three-year period from the date of the executed grant agreement
Program Link:	HUD Exchange Website - HOPWA	**Contacts:**	Jeff Kiemen, Office of HIV/AIDS Housing HOPWA Desk Officer for Illinois[7] P: 202-402-7302 | Jeffrey.T.Kiemen@hud.gov

U.S. Department of Housing and Urban Development (HUD) Administered Programs

The Department of Housing and Urban Development (HUD) is a federal agency whose mission is to create strong, sustainable, inclusive communities and quality affordable homes for all.[8] HUD supports multi-family affordable housing development through the formula grants listed in the previous section as well as through competitive grants, mortgage insurance with the Federal Housing Administration (FHA), technical assistance, and other mechanisms.

Additionally, the Government National Mortgage Association (Ginnie Mae) is a HUD entity that supports affordable housing by guaranteeing mortgage loans through mortgage backed securities (MBS).[9] Although Ginnie Mae does not directly provide grants or loans to affordable housing developers, it is a critical element of the affordable housing market and is the primary financing mechanism for all government-issued or guaranteed loans, including United States Veterans Administration (VA), United States Department of Agriculture (USDA), and HUD programs.

The funding opportunities provided by HUD are included in the discretionary federal budget. This means that the amounts of funding available for housing programs can vary from fiscal year to fiscal year.[10] Additionally, as Presidential leadership changes, new HUD Secretaries are appointed which can change the priorities and policies of HUD. Because of these factors along with changing housing market conditions and general fiscal limitations, housing programs administered by HUD can change relatively frequently. For the most up-to-date information regarding HUD programs, see the funding opportunities page on HUD's website here.

Program Title	Who Can Apply?	Target Population	Type of Resource	Funding Cycle	Description
Assisted-Living Conversion Program (ALCP)	Nonprofit Owners of Eligible Developments	Very low-income elderly	Competitive Grant	Annual	Through this program, owners of eligible properties convert some or all of the dwelling units in the project into an Assisted Living Facility (ALF) or Service-Enriched Housing (SEH) for elderly residents aging in place. An ALF must be licensed and regulated by the State.[11]

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Program Title	Who Can Apply?	Target Population	Type of Resource	Funding Cycle	Description
Demonstration Program for Elderly Housing For Intergenerational Families[2]	Non-profit owners of Section 202 Funding	Very low-income grandparent(s) raising a child	Capital Advance	Annual, dependent on Congressional appropriations	Through this program Capital Advance funding is available to cover the cost of expanding the supply of intergenerational housing. Project Rental Assistance Contract (PRAC) funds are also available for Section 202 Capital Advance projects that are funded under this program to cover the difference between the HUD-approved operating costs of the project and the tenants' contribution toward rent.
Ginnie Mae Mortgage Backed Security I (MBS) Program	Qualifying lenders in partnership with developers seeking loans	Residents of single-family & multi-family housing financed by government programs	MBS	Rolling	This program permits lenders to issue securities backed by pools of housing loans where the interest rate is the same for each loan in the pool. The lender decides whom to sell the security to and then submits the documents to Ginnie Mae's pool processing agent. The agent prepares and delivers the Ginnie Mae guaranteed security to the investors designated by the lender.
Lead-Based Paint Hazard Control (LHC) and Lead Hazard Reduction (LHRD) Grants	State, county, city or township government entities	Residents of single-family & multi-family housing with children under 6 years old	Competitive Grant	Annual	The LHRD program is targeted to urban jurisdictions that have at least 3,500 pre-1940 occupied rental housing units with a 25% match requirement. The LBPHC program is open to all jurisdictions, urban, suburban or rural and the match requirement is 10%. These programs aim to maximize the number of children under the age of six protected from lead poisoning. **Healthy Homes Supplemental funding** is available to enhance these programs by supporting comprehensively identifying and addressing other housing hazards.

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[2] This program was authorized in 2003 and in 2008 the program awarded funding for two properties. In FY21, Congress funded this program again, making awards available through the Intergenerational Housing Program for Section 202 property owners (Section 202: Supportive Housing for the Elderly, NLIHC 2021).

Program Title	Who Can Apply?	Target Population	Type of Resource	Funding Cycle	Description
Rental Assistance Demonstration (RAD) Program	Public Housing Authorities (PHAs)	Residents of Public Housing	Competitive Grant	Annual; Likely in October	Converts properties from HUD's "legacy" programs (Rental Supplement, Rental Assistance Payment, and Moderate Rehabilitation) to one of two types of, project-based Section 8 contracts: 1. Project Based Rental Assistance (PBRA), administered by HUD's Office of Multi-Family Programs or 2. Project-Based Vouchers (PBVs), administered by the PHA.
Section 202 Supportive Housing for Elderly	Nonprofit Developers and Owners of Supportive Housing	Very low-income elderly individuals	Interest-free capital advances and project based rental assistance	Annual; check grants.gov for next application period	This program provides capital advances to finance the construction, rehabilitation or acquisition with or without rehabilitation of structures that will serve as supportive housing for very low-income elderly persons, including the frail elderly, and provides rent subsidies for the projects to help make them affordable.
Section 8 Rental Assistance Program - *Housing Choice Voucher (HCV)*	Public Housing Authorities (PHAs)	Low- to Moderate-Income Households	Competitive Grant	Annual	There are nine HCV programs funded under the Office of Public and Indian Housing (PIH) under HUD.[3] Two categories of vouchers employed are tenant-based assistance and project-based assistance. These programs are allocated by HUD through each PHA's Annual Contributions Contract.
Section 811 Capital Advances	Developers using LIHTC, HOME funds, and other Federal, state, and local programs	Low-income individuals or households with disabilities	Competitive Grant	2/10/2020 - Potential renewal for FY 2022	Provides Capital Advance funding for the development of permanent supportive rental housing for very-low-income persons aged 18 years or older and provides operating subsidies in the form of a Project Rental Assistance Contract ("PRAC") to maintain ongoing affordability over the next forty years.

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[3] These nine programs are Family Unification Vouchers, Homeownership Vouchers, HUD-VASH Vouchers, Mainstream Vouchers, Project Based Vouchers (PBV), Tenant Based Vouchers, Tenant Protection Vouchers, and Witness Relocation Vouchers.

Program Title	Who Can Apply?	Target Population	Type of Resource	Funding Cycle	Description
Healthy Homes Production Grant Program	State, county, city and township governments, non-profit agencies	Households at or below 80% AMI	Competitive Grant	Annual	The purpose of the Healthy Homes Production Program is to comprehensively address multiple residential health and safety hazards, including mold, carbon monoxide, home safety hazards, pesticides and allergens (from pets and pests).
Healthy Homes Supplemental Funding (HHSupp)	State, county, city and township governments, non-profit agencies	Residents of single-family & multi-family housing with children under 6 years old	Competitive Grant	Annual	Healthy Homes Supplemental (HHSupp) funding is for the Office of Lead Hazard Control and Healthy Homes' (OLHCHH's) lead hazard control grants[4] and is used for identifying and remediating multiple housing-related health and safety hazards that are not lead-based paint hazards.[12]
HUD-Veterans Affairs Supportive Housing (VASH)	Public Housing Agencies (PHA) in area of high need and within the jurisdiction of a VA medical Center (VAMC)	Veterans experiencing homelessness	Competitive Grant	Annual registration, apply upon receiving invitation	Through this program, Public Housing Agencies (PHAs) apply for vouchers to support homeless Veterans. This program combines HUD's Housing Choice Voucher (HCV) rental assistance for homeless Veterans with case management and clinical services provided by the Department of Veterans Affairs (VA). VA provides these services for participating Veterans at VA medical centers (VAMCs), community-based outreach clinics (CBOCs), through VA contractors, or through other VA designated entities.

[4] The office's "lead hazard control grants" are its Lead-Based Paint Hazard Control (LBPHC) Grant Program funds and Lead Hazard Reduction (LHRD) Grant Program.

U.S. Department of Housing and Urban Development (HUD) and Federal Housing Administration (FHA) Mortgage Insurance Programs

Through HUD/FHA mortgage insurance programs, developers or owners of multi-family housing pursue loans with HUD-approved lenders and the FHA insures the lender against loss on mortgage defaults. Below are a list of mortgage insurance programs facilitated by HUD:

Program Name	Description	Program Link
Section 207	Rental housing or Manufactured Home Parks	HUD website Section 207
Section 213	Cooperative Units	HUD website Section 213
Section 220	Rental Housing for Urban Renewal and Concentrated Development Areas	HUD website Section 220
Section 221(D)(4)	Mortgage Insurance for Rental and Cooperative Housing	HUD website Section 221(D)(4)
Section 223(A)(7)	Mortgage Insurance for Purchase for Refinancing of Existing Multi-Family Rental Housing	HUD website Section 234(D)
Section 231	Rental Housing for Elderly	HUD website Section 231
Section 232	Healthcare Purchase Financing & Refinancing	HUD website Section 232
Section 234(D)	Mortgage Insurance for Construction or Substantial Rehabilitation of Condominiums	HUD website Section 234(D)
Section 241(A)	Mortgage Insurance for Supplemental Loans for Multi-Family Projects	HUD Website Section 241(A)
Section 542(B)	Qualified Participating Entities Risk-Sharing Program	HUD website Section 542(B)
Sections 207/223(F)	Mortgage Insurance for Purchase or Refinancing of Existing Multi-Family Rental Housing	HUD website Section 207/223(F)

Illinois Housing and Development Authority (IHDA) Administered Programs

The Illinois Housing and Development Authority (IHDA) is the state's Housing Finance Agency (HFA).[13] IHDA administers publicly funded programs on behalf of the State to support both multi-family and single-family affordable housing. IHDA is also a bonding authority who independently sells bonds to support these activities.[14]

Program Title	Who Can Apply?	Target Population	Type of Resource	Funding Cycle	Description
Affordable Advantage Mortgage	Developers/ Owners/ Non-Profits	Low-Income Populations	Loan	Rolling Deadline	For this program, IHDA issues a fixed-rate, first lien permanent mortgage financing or refinance for stabilized new construction, acquisition/minimal rehabilitation projects.[15]
Credit Advantage Mortgage	Developers/ Owners/ Non-Profits	Low-Income Households	Loan	Rolling Deadline	This product is first lien construction and permanent mortgage loan financing for new construction, acquisition and rehabilitation, and adaptive reuse projects.
Federal Housing Trust Fund (HTF)[5]	State housing agencies subgrant funds subgrantees determined by the State's annual Allocation Plan[6]	Dependent on program year	Competitive Grant	Annual	HTF funds may be used for the production or preservation of affordable housing through the acquisition, new construction, reconstruction, and/or rehabilitation of non-luxury housing with suitable amenities. All HTF-assisted rental housing must meet a 30-year affordability period. Subgrantees (local units of government, nonprofits and for-profit agencies) apply for HTF monies directly with Illinois' state housing agency (IHDA).

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[5] The Federal Housing Trust Fund was created in 2008 under the Housing and Economic Recovery Act (HTF Fact Sheet, HUD).
[6] The HTF Allocation Plan is included in the State of Illinois Action Plan (annual) or State Consolidated Plan (every 5 years). It is a different document than the Qualified Allocation Plan (QAP) which is used for LIHTC allocation (State of Illinois 2019 Action Plan, IHDA)

Program Title	Who Can Apply?	Target Population	Type of Resource	Funding Cycle	Description
[Illinois State Donation Tax Credit (IAHTC)]()	Developers/ Owners/ Non-Profits	Low Income Persons (60% AMI or below)	Tax Credit	Rolling Deadline	This program encourages private investment in affordable housing by providing donors of qualified donations with a one-time tax credit on their Illinois state income tax equal to 50% of the value of the donation. The donor can choose to transfer the credits to the project, which creates additional project financing through syndication of the credits.
[Illinois Affordable Housing Trust Fund (IAHTF)]()[7]	Developers/ Owners/ Non-Profits	Dependent on program year	Loan	Rolling Deadline	IAHTF is IHDA's most flexible resource for gap financing for rental housing and financing of smaller properties. Also used for leveraging with Community Development Assistance Program (CDAP) housing rehabilitation (match) and the Home Modification Program.
[Low Income Housing Tax Credit (4%)]()	Developers, Owners, Non-profits	Low- and Moderate-Income Persons	Tax Credit	Rolling Deadline	Projects eligible for the 4% tax credit have at least 50% of the financing coming from tax-exempt bonds and can receive a maximum annual tax credit allocation based on a rate which is generally 4% (but not always 4%) of the project's eligible basis which generally generates about 30% of the developments equity; The number of 4% tax credits available is based on each states' volume cap of private activity bonds; Developers apply on a non-competitive, first come, first serve basis.

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[7] Illinois Affordable Housing Trust Fund was created in 1989 and is appropriated by the Illinois General Assembly from state's real estate transfer fee ([Illinois Affordable Housing Trust Fund](), NLIHC)

Program Title	Who Can Apply?	Target Population	Type of Resource	Funding Cycle	Description
Low Income Housing Tax Credit (9%)	Developers, Owners, Non-profits	Low- and Moderate-Income Persons	Tax Credit	Rolling Deadline	The number of 9% tax credits available is determined by population and is allocated by the federal government every year; States develop a competitive application process to award 9% deals. In Illinois this is called the Qualified Allocation Plan (QAP) and is released each year by IHDA. This credit tends to generate about 70% of a development's equity.
One-Stop Plus	Developers seeking a 4% tax credit syndication partner	Low- and Moderate-Income Persons	Loan	Rolling Deadline	IHDA provides a one-stop shop for borrowers/developers seeking a tax credit syndication partner. Through this program, IHDA provides a short-term, interest-only tax-exempt loan along with a permanent, taxable IHDA Federal Financing Bank (FFB) mortgage and allocates the 4% tax credit to the developer.
Permanent Supportive Housing (PSH) Development Program	Developers of supportive housing - Non-profit, for-profit, and joint-venture developers	Households headed by persons with chronic disabilities at risk of being homeless	Competitive Grant	Annual	Through this program, developers of supportive housing receive a grant for the acquisition, construction, rehabilitation of existing occupied or vacant units, or adaptive reuse of non-residential properties. Projects will have 25 units or fewer all of which are PSH; Tenants must make 30% AMI or less and must need access to supportive services in order to maintain housing stability
Soft Funds	Developers of 9% LIHTC Properties	Low- and Moderate-Income Persons	Gap Financing	Rolling Deadline	Projects applying for 9% LIHTC may leave a financial gap and IHDA will fill the gap at its discretion assuming resources are available. Soft fund resources may include the Federal HOME Program and the Illinois Affordable Housing Trust Fund Program (IAHTF).

Illinois Housing and Development Authority (IHDA) Bond Programs

IHDA is an issuer of taxable and tax-exempt bonds. IHDA uses bond proceeds to finance the creation and preservation of apartments affordable to lower-income families in Illinois. As a conduit issuer, IHDA issues short-term and long-term taxable and tax-exempt bonds and loans from a portion of the State's annual volume cap amount. The developer seeks out a private placement or public offering of those bonds to a bank or investor. To see up to date information about IHDA bonds, click here.

Program Name	Description	Program Link
Conduit Bond Program	IHDA can act as a conduit bond lender by issuing tax-exempt bonds from its annual volume cap amount. The developer seeks out a private placement of those bonds to a bank or investor. IHDA acts as a development partner, while deferring the majority of the underwriting to the lender.	Program Manual - 2018
Direct Purchase Bond Program	IHDA structures a short-term and/or long-term conduit bond or loan (for tax-exempt transactions). For either a taxable 9% deal or a 4% tax-exempt bond deal, IHDA will enter into a Bond Purchase Agreement (BPA) to issue bonds at closing or to issue refunding bonds at project stabilization with an institution selected by the borrower.	Program Guidelines - 2019
Portfolio Bond Program	IHDA can act as bond issuer and lender and provide credit enhancement through its HUD Risk Share Program. IHDA will underwrite the loan to the Risk Share standards and obtain an FHA-insured loan. The developer is able to work with IHDA directly for the bond issuance, bond loan and automatic 4% LIHTC award. IHDA will also sell the bonds in the marketplace to obtain the bond rate.	Program Guidelines - 2019

Illinois Department of Public Health (IDPH) Administered Programs

The Illinois Department of Public Health's (IDPH) mission is "to promote health through the prevention and control of disease and injury".[16] IDPH is involved in a variety of health programs and services ranging from food safety to environmental health protection. IDPH is primarily involved in housing by setting standards for nursing homes and assisted living facilities and other special services for housing individuals with health needs. For up to date information about IDPH grants please visit The Catalog of State Financial Assistance (CSFA) here.

Program Title	Who Can Apply?	Target Population	Type of Resource	Funding Cycle	Description
Ryan White CARE Services	Medical case management, healthcare and support services entities	Individuals living with HIV/AIDS	Competitive Grant	Annual	Care services include Illinois HIV Care Connect which is an extensive, statewide network of medical case management, healthcare and support services for people living with HIV. Care services also include utility, short-term rent and mortgage assistance using Housing Opportunities for Persons with HIV/AIDS (HOPWA) funding received from the Department of Housing and Urban Development (HUD). To locate Care Connect agencies click here.

Federal Home Loan Bank of Chicago (FHLB) Administered Programs

The Federal Home Loan Bank of Chicago (FHLB) is one of 11 district FHLBanks chartered by the U.S. Congress. The FHLB of Chicago supports mortgage lending and community investment and has a service area that includes Illinois and Wisconsin.[17] For a list of FHLB of Chicago member banks in Illinois click here.

Program Title	Who Can Apply?	Target Population	Type of Resource	Funding Cycle	Description
Affordable Housing Program (AHP) General Fund	FHLB of Chicago Member Lenders in Partnership with developers and government entities	Low-Income Populations	Competitive Grant	Annual; Typically in June	FHLB member institutions partner with for- and not-for-profit developers, community organizations, units of government, public housing authorities, and tribal governments to apply for annual grants to subsidize the acquisition, new construction, and/or rehabilitation of affordable rental housing where at least 30% of the units are affordable to households who are at or below 50% AMI. AHP subsidy is provided as a forgivable grant from the Federal Home Loan Bank of Chicago, through a member, to a project sponsor. Organizations can also apply for funding to support owner-occupied housing.
Community Housing Advance	FHLB of Chicago Member Lenders in Partnership with developers and government entities	Low- to Moderate-Income Households	Loan	Annual	Through this program, the FHLB of Chicago provides member lenders with favorably priced advances and letters of credit (LCs) for financing eligible owner-occupied and rental housing in their communities. Eligible advances and LCs are priced below Federal Home Loan Bank of Chicago's (FHLBC) standard advance and LC rates.

Department of Agriculture (USDA) Administered Programs

Rural Development (RD) is one of 17 unique agencies at the USDA. RD supports affordable housing development as well as other activities that aim to bring prosperity and opportunity to rural areas. Illinois Multi-Family Housing Programs are supported by the Midwest Region Housing Contacts that can be found here. The designated Rural Development field office for McLean County and surrounding areas is located in Pontiac, Illinois in Livingston County. For the most up-to-date information on the Local Service Centers in the area, please click here. Additionally, for the most up-to-date information regarding grants and loans administered by the USDA please click here.

Program Title	Who Can Apply?	Target Population	Type of Resource	Funding Cycle	Description
Communities Facilities (CF) Programs	Public Bodies, Community-Based Non-Profit Organizations, and Federally Recognized Tribes in partnership with a private lender	Individuals Living in Rural Areas with 20,000 residents or less	Loan	CF budget is dependent upon the Federal allocations to the program	Funds can be used to purchase, construct, and/or improve essential community facilities, purchase equipment and pay related project expenses including homeless shelters and transitional housing projects. Applicants must work with a commercial lender to apply for funds.
Multi-Family Preservation and Revitalization (MPR) Demonstration Loans and Grants Program	Owners of USDA-financed Rural Rental Housing or Farm and Labor Housing Projects (USDA Sections 514/515)	Very low- to low-income renters in Rural Rental Housing or Farm Labor Housing	Competitive Grant	Open - Rolling Deadline	This program is used to restructure loans for existing USDA Rural Rental Housing and Off-Farm Labor Housing projects to help improve and preserve the availability of safe, affordable rental housing for low income residents. MPR funding tools include debt deferral, soft second loans, 0% loans, and grants to address a project's exigent health and safety needs pg. 31-5, 2021 Congressional Justifications - Rural Housing Services).

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Program Title	Who Can Apply?	Target Population	Type of Resource	Funding Cycle	Description
Section 514: Off-Farm Labor Housing Loans (Off-FLH)	Non-profit organization, federally recognized tribe, state or local government	Year-round and migrant or seasonal domestic farm laborers	Loan	Application open on an annual basis and typically closes in fall	Off-Farm Labor Housing projects are designed to increase the supply of affordable housing for farm laborers regardless of the farm where they work. This program provides loans for eligible developers. Developers of these projects may apply for USDA rental assistance contracts. The USDA may award technical assistance grants to eligible private and public nonprofit agencies.[18]
Section 515: Multi-Family Housing Direct Loans	Individuals; trusts; associations; partnerships; limited partnerships; State and Local entities; nonprofit organizations; For-profit organizations	Low-income; elderly; or disabled individuals or families	Loan	Application open on an annual basis and typically closes in fall	Through this program, entities can apply for loans for construction or rehabilitation for rural multi-family housing. The program is typically used in conjunction with the Section 521 Rental Assistance Program. With assistance, tenants pay a maximum of 30% of their income toward rent and utilities. Some 515 projects also use Housing and Urban Development Section 8 project-based assistance, which enables additional very-low-income families to be helped. There are four variations of the Section 515 loan program: 1) Cooperative Housing, 2) Downtown Renewal Areas, 3) Congregate Housing or Group Homes for Persons with Disabilities 4) the Rural Housing Demonstration Program.
Section 516: Off-Farm Housing Grants (Off-FLH)	Non-profit organization, federally recognized tribe, state or local government	Year-round migrant or seasonal domestic farm laborers	Competitive Grant	Rolling; Second Round Closes November 1st, 2021[19]	Off-Farm Labor Housing projects are designed to increase the supply of affordable housing for farm laborers regardless of the farm where they work. Eligible developers of these projects may apply for USDA rental assistance contracts (i.e. USDA Section 521 and USDA Section 541). The USDA may award technical assistance grants to eligible private and public nonprofit agencies.

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Program Title	Who Can Apply?	Target Population	Type of Resource	Funding Cycle	Description
Section 521 Rental Assistance (RA)	Owners of USDA-financed Rural Rental Housing or Farm and Labor Housing Projects (USDA Sections 514/515)	Very low- to low-income renters in Rural Rental Housing or Farm Labor Housing	Competitive Grant	Rolling Deadline	Through this program, rental payments are made on behalf of tenants and go directly to property's income to cover operational expenses. Rental Assistance is coupled with an application for new construction financing under the Rural Rental Housing or Farm Labor Housing programs. For a list of USDA Multi-Family Rental Housing Units see USDA Website (last updated in 2015).
Section 538: Multi-Family Housing Loan Guarantees	State and Local entities; nonprofit organizations; For-profit organizations	Individual units is capped at 30% of 115% of AMI	Loan	Application open on an annual basis and typically closes in winter	The program works with qualified private-sector lenders to provide financing to qualified borrowers to increase the supply of affordable rental housing for low- and moderate-income individuals and families in eligible rural areas and towns. Project must consist of at least 5 units; The maximum guarantee is typically 90% for for-profit entities and 97% for nonprofit entities; Lenders must be active in programs facilitated by HUD, Fannie Mae, Freddie Mac, Ginnie Mae, FHLB, or IHDA.
Section 542: The Rural Development Voucher Program (RDVP)	Owners of USDA-financed by Section 515 Multi-Family Housing Direct Loans	Very low- to low-income renters in Rural Rental Housing	Competitive Grant	Rolling Deadline	Through this program, vouchers are available to provide tenant protections in Section 515 properties prepaying mortgages after September 30, 2005, and Section 515 properties in foreclosure. Vouchers are portable and enable residents to seek tenancy elsewhere by offsetting the rent and utility costs at other rental housing.

State, Non-profit, and other Miscellaneous Programs

The development and preservation of affordable housing can involve a variety of government and non-government agencies. Below are state and non-profit programs targeted toward multi-family affordable housing as well as funding opportunities that are not targeted towards affordable housing but can be leveraged to support affordable housing development.

Program Title	Who Can Apply?	Target Population	Type of Resource	Funding Cycle	Description	Source of Program
LISC Rental Housing Loans	Community development corporations, nonprofit and for-profit affordable housing developers, local and state housing authority	Low- and Moderate-Income Persons	Loan	Rolling Deadline	Through this program, eligible borrowers apply to LISC for a loan to support a variety of multi-family housing objectives for rental housing. Bridge, working capital, predevelopment, acquisition, construction, mini-permanent and permanent loan options are available. Projects must be rental housing, for-sale housing, community facilities, commercial and/or mixed-use projects.	Local Initiatives Support Corporation (LISC)
Multi-Family Housing Revenue Bond Program	501(c)(3) not-for-profit developers of affordable Housing	Low and moderate income households, including the elderly and disabled	Loan	Rolling	Provides long-term, low-cost capital to experienced commercial and 501(c)(3) not-for-profit developers for the acquisition, renovation, rehabilitation or construction of multi-family rental housing for low and moderate income households, including the elderly and disabled.[20]	Illinois Finance Authority (IFA)

Table continued on the next page.

Program Title	Who Can Apply?	Target Population	Type of Resource	Funding Cycle	Description	Source of Program
Net Zero Energy Building Program	Local government agencies, non profits, and colleges/ universities	Dependent on qualified project	Grants and Equity	RFIs accepted twice a year	The Foundation's Net Zero Energy Building Program will award grants to new construction or retrofit projects that achieve site net zero energy performance, or better, over the course of a year. Buildings must, at a minimum, offset all of their energy consumption with on-site generation from renewable resources. Eligible applicants may apply for up to $2,000,000 or 80% of the incremental costs to achieve net zero energy.[21]	Illinois Clean Energy Community Foundation
Private Activity Bonds (PAB)	Municipalities, Counties, and State Agencies	Dependent on qualified project	Bond	Rolling, with benchmarks	Private activity bonds are tax-exempt bonds issued by or on behalf of a local or state government for the purpose of providing special financing benefits for qualified projects. All units of government must submit allocation request letters. Requests must be for specific projects, and no unit of government may be granted more than 10% of the amount of total allocation initially available to units of local government for a single project.[22]	Governor's Office of Management and Budget
Road to Capacity Predevelopment Fund (RCPF)	Nonprofit and for-profit affordable housing developers, local and state housing authority	Low- and Moderate-Income Persons	Loan	Rolling Deadline	Through this program, eligible borrowers apply to a new revolving fund to address predevelopment needs. RCPF will provide 0% interest repayable investments for predevelopment and feasibility costs of high impact community development projects that will spur economic development.	Rural LISC

Table continued on the next page.

Program Title	Who Can Apply?	Target Population	Type of Resource	Funding Cycle	Description	Source of Program
501(c)(3) Revenue Bond Program	Non-Profit Entities	N/A	Loan	Rolling	Tax-exempt bond financing affords qualified non-profits the opportunity to purchase capital equipment without depleting cash reserves or paying the higher costs of traditional debt financing. Tax-exempt financing may be used by non-profits for the acquisition, construction or renovation of real estate; the acquisition of machinery, equipment or other fixed assets, or, in some cases, refinancing outstanding debt. The maturity of the debt will generally match the useful lives of the assets financed.[23]	Illinois Finance Authority (IFA)

Government Sponsored Enterprise (GSE) Multi-Family Development Programs

Government-Sponsored Enterprises (GSE) are privately held entities created by acts of Congress. These institutions do not lend to the public directly, rather they ensure equity to direct mortgage lenders by guaranteeing third-party loans and by purchasing loans on the secondary mortgage market. The Federal National Mortgage Association (Fannie Mae) and the Federal Home Loan Mortgage Association (Freddie Mac) are mortgage issuers that are GSEs.[24] Lenders partner with GSEs to provide lending options for a variety of purposes targeted towards diverse forms of affordable housing. This includes loans, refinancing, and credit enhancements, among other mechanisms for the acquisition, development, and preservation of cooperative housing, LIHTC properties, multi-family rental housing, manufactured housing and more.

Freddie Mac Multi-Family Housing Programs

Freddie Mac's multi-family housing lenders are a part of the Optigo® Targeted Affordable Housing (TAH) lenders network. These lenders partner with Freddie Mac to provide loans for conventional, small balance loans, affordable housing and senior housing. To see the list of Optigo® lenders with programs targeted for multi-family affordable housing please click here.

Fannie Mae Multi-Family Housing Programs

Fannie Mae multi-family housing programs are supported by Delegated Underwriting and Servicing (DUS®) lenders. There are 25 financial institutions and independent mortgage lenders in this network. For a list of partner DUS lenders and all of Fannie Mae's lender partners please click here.

Appendix A: Qualified Allocation Plan (QAP)

The Qualified Allocation Plan (QAP) sets forth the criteria for evaluating all projects that apply for a tax credit allocation. To access the most recent Qualified Allocation Plan click here.

Appendix B: List of Acronyms

ACHP	Annual Comprehensive Housing Plan
AHP	Affordable Housing Program
ALF	Assisted Living Facility
AMI	Area Median Income
ARM	Adjustable Rate Mortgage
ARP	American Rescue Plan
CAPER	Consolidated Annual Performance and Evaluation Report
CARES Act	Coronavirus Aid, Relief, and Economic Security Act
CBOC	Community-Based Outreach Clinics
CDBG	Community Development Block Disaster Recovery Program
CDC	Community Development Corporation
CDFI	Community Development Financial Institution
CDT	The Community Development Trust
CHDO	Community Housing Development Organization
CICoC	Central Illinois Continuum of Care
CMF	Capital Magnet Fund
CoC	Continuum of Care
CPD	The Office of Community Planning and Development
CSFA	Catalog of State Financial Assistance
DCEO	Department Of Commerce And Economic Opportunity
DUS	Delegated Underwriting and Servicing
EDGE	Economic Development for a Growing Economy Tax Credit Program
ESG	Emergency Solutions Grant
Fannie Mae	The Federal National Mortgage Association
FFB	Federal Financing Bank
FHA	Federal Housing Administration
FHFA	The Federal Housing Finance Agency
FHLB	Federal Home Loan Bank
FLH	Farm Labor Housing
Freddie Mac	The Federal Home Loan Mortgage Corporation
Ginnie Mae	The Government National Mortgage Association
GRF	State General Revenue Funds
GSE	Government Sponsored Entity
HFA	Housing Finance Agency
HHSupp	Healthy Homes Supplemental Funding
HMIS	Homeless Management Information
HOPWA	Housing Opportunities for Persons With AIDS
HTF	Housing Trust Fund (Federal)
HUD	Department of Housing and Urban Development
IAHTC	Illinois State Donation Tax Credit
IAHTF	Illinois Affordable Housing Trust Fund
IDHS	Illinois Department of Human Services
IDVA	Illinois Department of Veterans' Affairs
IHDA	Illinois Housing and Development Authority
ISHPO	Illinois State Historic Preservation Office
LBPHC	Lead-Based Paint Hazard Control
LHRD	Lead Hazard Reduction
LIHTC	Low Income Housing Tax Credit
LISC	Local Initiatives Support Corporation
MBS	Mortgage Backed Securities

MPR	Multi-Family Preservation and Revitalization
NOAH	Naturally Occurring Affordable Housing
OLHCHH	Office of Lead Hazard Control and Healthy Homes
OPH	Other Permanent Housing
OZ	Opportunity Zone
PAB	Private Activity Bonds
PBV	Project Based Vouchers
PHA	Public Housing Agencies
PJ	Participating Jurisdictions
PRAC	Project Rental Assistance Contract
PSH	Permanent Supportive Housing
QAP	Qualified Allocation Plan
RA	Rental Assistance
RAD	Rental Assistance Demonstration
RCPF	Road to Capacity Predevelopment Fund
RD	Rural Development
RDVP	Rural Development Voucher Program
REIT	Real Estate Investment Trust
RRH	Rapid Re-Housing
SH	Safe Haven
SHE	Service-Enriched Housing
TEL	Tax-Exempt Loan
TH	Transitional Housing
VA	Department of Veterans Affairs
VAMC	VA medical centers
VASH	Veterans Affairs Supportive Housing

Endnotes

1. Metropolitan Mayors Caucus. (2019). "Housing + Community Development Municipal Resource Guide". Retrieved from https://mayorscaucus.org/wp-content/uploads/2013/10/HCD-Municipal-Resource-Guide-2.pdf
2. HUD CDBG Entitlement Program Eligibility Requirements Website
3. HUD CPD Staff Website
4. HUD. (2019). "CDBG-DR Policy Guidance for Grantees"
5. Housing Opportunities for Persons with AIDS, 24 eCFR § 574.3 (1992).
6. Killelea, L. Bennett, R. (2019). "Housing Opportunities for Persons with AIDS (HOPWA)"
7. HOPWA Staff Contacts. Retrieved from https://www.hudexchange.info/programs/hopwa/hopwa-national-technical-assistance/
8. HUD Website retrieved from Mission Page
9. Ginnie Mae Website
10. Dohler, E. (2021). "A Tangled Web: The Problem with Fragmented Housing Assistance". *ShelterForce.*
11. HUD Exchange; Multi-Family Housing Program Financial Management Toolkit
12. Healthy Homes Production funding and Healthy Homes Supplemental funding cannot be combined (HUD Healthy Homes Production Grant Program FAQs, 2021)
13. NCSHA Website
14. IHDA Website
15. 2017 Affordable Advantage Mortgage Program Overview
16. Illinois.gov Website
17. FHFA. (2019). "11 Federal Home Loan Bank Districts".
18. The Housing Assistance Council. (2011). "USDA Rural Rental Housing Loans Section 515"
19. Federal Register, Vol. 86, No. 20 (2021).
20. Multi-Family Housing Revenue Bond program Summary
21. Illinois Clean Energy Foundation. "Net Zero Energy Building Program"
22. Metropolitan Mayors Caucus. (2019). "Housing + Community Development Municipal Resource Guide"
23. IFA 501(c)(3) Revenue Bond Program Summary
24. Segal, T. (2020). "Government-Sponsored Enterprise (GSE)". Retrieved from https://www.investopedia.com/terms/g/gse.asp

Municipal Housing Resource Guide Use and Recommendations

The Municipal Housing Resource Guide serves as a point-in-time resource guide to support multi-family affordable housing in McLean County. This document should be updated regularly using the resources outlined in the Development of the Municipal Housing Resource Guide section. Additionally, and in the future, this guide could serve as a part of a new program for the Regional Housing Initiative to provide a one-stop-shop for housing resources for affordable housing developers, housing agencies, and municipalities in McLean County. A proposed third committee of the Regional Housing Initiative, the Innovative Housing Solutions Committee, could spearhead this initiative. Although this initiative has not yet officially started, members of the two committees of the Regional Housing Initiative identified the creation of this committee as one of the work elements for the Regional Housing Initiatives 5-Year Strategic Priorities it adopted in 2018. In the meantime, while this new initiative develops, this Guide will be available to the members of the Regional Housing Initiative.

Although this resource serves the interests of affordable housing developers and municipal leaders, it could also assist citizens in reviewing and learning more about the various entities involved in multi-family housing and the multiple programs provided through these entities. It is important to emphasize that the programs listed do not provide information individuals can directly use as consumers, such as rental assistance programs, but it does provide insight into what agencies administer housing programs. Although the guide is not currently available to the public, it may be made available via MCRPC's website in the future.

Although the Municipal Housing Resource Guide fulfills a goal identified by the Regional Housing Initiative and may be helpful for affordable housing developers, municipalities, and the public, it has many limitations. First, the guide is static. This may prevent individuals from using the guide because it is not interactive. Other funding guides, such as The National Association of Counties' (NACo) funding matrix for the Infrastructure Investment and Jobs Act of 2021, allow users to filter programs based on their interests and click on each program for further information. This helps users easily navigate the tool to suit their communities' needs. Another attribute of NACo's funding matrix is as program application periods close, NACo removes them from the matrix in real-time. Although this municipal guide should be updated regularly, it is not guaranteed that staff will have the capacity to do so. Thus, the document may not be updated as new information is released for each program or if a program closes in real-time. The potential lack of updating this information may prevent stakeholders from referencing the Municipal Housing Resource Guide. Despite these limitations, this guide provides a starting point for the Regional Housing Initiative to explore funding opportunities to support the development, maintenance, and preservation of affordable multi-family housing and a chance to launch the Innovative Housing Solutions Committee.

To further support the effort to develop and preserve multi-family affordable housing, this capstone outlines recommendations that the Innovative Housing Solutions Committee could explore. These recommendations were developed by reviewing the Regional Housing Initiative's priorities, previous local housing planning documents, strategic plans for existing organizations, and resources to develop the Municipal Housing Resource Guide. The recommendations are centered on three challenges faced by the multi-family affordable housing sector in McLean County and aim to complement or expand upon existing recommendations, particularly Recommendation 4.4 outlined in the 2017 Bloomington-Normal Regional Housing Study, "Create additional multi-family housing for very low-income families" (77). The challenges outlined below are not the only ones faced by the multi-family affordable housing sector, but they provide another perspective on this topic with a more explicit focus on multi-family housing.

These three challenges identified by this capstone include the unavailability of locally sourced and timely data, the absence of mission-based affordable housing organizations, and the lack of complex funding opportunities and inclusionary housing policies. For each challenge, I provide information on the current context in McLean County and the related or complementary housing goals or recommendations established in other plans. Then for each recommendation, I outline implementation strategies and outside resources to inform those strategies.

Challenge 1 – Unavailability of timely and locally sourced data on multi-family housing providers & residential rental property characteristics

Current Context & Related Local Housing Goals

Data regarding the attributes and costs of residential rental units and property owner characteristics are critical to understanding and addressing issues of affordable housing markets (Bibri & Krogstie, 2021). Despite this, there are few publicly available datasets and limited efforts to gather locally sourced housing information. Additionally, McLean County, the City of Bloomington, and the Town of Normal lack a regional framework for compiling and maintaining residential rental housing data and property owner characteristics from local sources. Unfortunately, McLean County and its associated municipalities are not alone in this issue. According to Boeing and Waddell (2016, 3), “there are no comprehensive data sources” that capture the “full scope” of affordable housing. This is particularly true for smaller housing markets (Boeing, Waddell, 2016).

Planners often use two widely used housing data sources: private company data and Census Bureau’s American Community Survey (ACS) data. In addition, there are two primary sources of data at the local level: renter registration programs and citizen surveys to support the Consolidated Planning process. The information gathered from these four sources is helpful, but they have three significant limitations: the data can be broad, unavailable in a timely manner, and often does not gather the type of information needed to inform the Regional Housing Staff Committee on federally-assisted housing and naturally occurring affordable housing (NOAH).

Private companies, such as CoreLogic, CoStar, Reis, and CBRE, and the Census Bureau's American Community Survey (ACS) are the two widely used sources by planners for housing data, but neither provide a complete picture of housing stock and property owners. Private companies can be helpful tools to provide insight into the housing market because they gather primary data directly from large apartment complexes' managers and brokers. However, this data is costly[8] and often primarily used to develop major planning documents every few years. In particular, the high cost of data can be a barrier to accessing critical and timely housing data when market conditions change during events such as the onset of a global pandemic.

The second source of housing data, the Census Bureau's American Community Survey (ACS), also presents challenges, including the reliability of certain data sets and data granularity. Currently, MCRPC uses ACS data to populate the McLean County IL Housing Data Dashboard on MCRPC's website. This information helps understand broad geographies and general topics, such as the median rent of Bloomington or the county overall, but it does not provide more granule information to support affordable housing efforts. For example, as displayed in Table 1, the estimates for the total number of housing units in different price ranges for the Bloomington Urbanized Area have relatively high margins of error and high coefficients of variation. These

[8] For example, in the "2017 BN Regional Housing Study", *Ratio*, the consultant that developed the plan, cost a fee of nearly $90,000, $40,540 of which was allocated for data collection and analysis to generate an Existing Conditions Report.

values are indicated in red, making many estimates relatively unreliable, especially for housing costing less than $500 and more than $1,249. And while more common monthly rent costs ranging between $500 and $1,249 produce more reliable coefficients of variation, this data does not provide more specific information on where these units are located. The data becomes even more unreliable as the ACS data focus on smaller areas, such as zip codes or census tracts, which are still broad geographic areas. See Appendix 1 for the coefficient of variation of 2020 Contract Rent by census tract in McLean County. Overall, the ACS is helpful for general information, but because the population in McLean County is not densely populated and census tracts and zip codes are geographically large areas, data on specific topics can be unreliable and often provide too generalized information (Jones, 2017).

Table 1: 2020 Contract Rent in Bloomington Urbanized Area (5-Year Estimates)
Source: U.S. Census Bureau, American Community Survey 2020 Table B25056

Rent	Number of Units	Estimated Percent of Housing Stock*	Margin of Error	Coefficient of Variation**
Total Units	23,220		±955	3%
Total Units with Cash Rent	22,634		±907	2%
Rent Less than $100	73	0%	±49	41%
Rent $100 to $149	101	0%	±68	41%
Rent $150 to $199	81	0%	±54	41%
Rent $200 to $249	212	1%	±111	32%
Rent $250 to $299	378	2%	±287	46%
Rent $300 to $349	317	1%	±123	24%
Rent $350 to $399	658	3%	±291	27%
Rent $400 to $449	773	3%	±212	17%
Rent $450 to $499	884	4%	±250	17%
Rent $500 to $549	1,541	7%	±297	12%
Rent $550 to $599	1,550	7%	±308	12%
Rent $600 to $649	2,310	10%	±359	9%
Rent $650 to $699	1,328	6%	±258	12%
Rent $700 to $749	2,219	10%	±377	10%

Table continued on next page

Rent	Number of Units	Estimated Percent of Housing Stock*	Margin of Error	Coefficient of Variation**
Rent $750 to $799	1,756	8%	±330	11%
Rent $800 to $899	2,314	10%	±466	12%
Rent $900 to $999	1,642	7%	±350	13%
Rent $1,000 to $1,249	2,197	10%	±416	12%
Rent $1,250 to $1,499	869	4%	±229	16%
Rent $1,500 to $1,999	758	3%	±212	17%
Rent $2,000 to $2,499	363	2%	±168	28%
Rent $2,500 to $2,999	152	1%	±101	40%
Rent $3,000 to $3,499	108	0%	±115	65%
Rent $3,500 or more	50	0%	±64	78%
Rent No cash rent	586	3%	±194	20%

*Estimate based on Total Units with Cash Rent
**Coefficient of variation calculated by generating the standard error (SE), SE = MOE/1.645, then CV = SE/Estimate x 100. When CV is between 15 percent and 30 percent, the estimate is deemed to have medium reliability, and when the CV is over 31 percent, the estimate has low reliability (U.S. Census Case Studies, ACS Data Users Group).

Aside from private companies and ACS data, there are two primary ways housing professionals collect local-level data. First, residential rental property owner information is available for both Bloomington and Normal through their respective annual rental property registration processes. This is unique for municipalities. According to research conducted by the Urban Institute in 2022, only three of the 15 major cities examined for their study had rental registries, and less than half of them tracked multi-family property owner addresses (Walker & Noble, 2022). Bloomington and Normal's property owner registration programs aim to gather information for inspections and physical maintenance purposes.[9] Through these distinct

[9] The City of Bloomington requires owners of residential rental properties to register annually for the Rental Housing Inspection Program. The purpose of this program is to inspect rental properties, assign a "passing" or "failing" rating, and ensure properties fix repairs, if needed. Registration fees are $65 per building with an additional $5 fee for every additional unit in increments of three after the first two units. The Town of Normal's residential rental housing registration process is also used for the purpose of inspection. The Town of Normal conducts inspections every year, unlike Bloomington, which, after the initial inspection, only conducts inspections upon need.

registration programs, the municipalities collect information on the property owner's name, contact information, mailing address, the location of the residential rental housing units, and the number of units. These processes are a critical element of local housing policy that ensures rental housing stock is physically maintained. However, they do not provide critical information needed to assess the local affordable housing market, such as the cost of rental units, the accessibility of the units, if the housing leverages local, state, or federal financing, or if there are services, such as social or health services, on the premises. Furthermore, these processes are not consistent between the City and the Town, and only the Town of Normal publishes the information to the public (City of Bloomington, 2021).

Second, via the mandated Citizen Participation Plan (US Department of Housing and Urban Development, 2014), the Consolidated Planning process conducts surveys to gather local data related to housing. This data is helpful because it collects information directly from residents of Bloomington and Normal. However, this data is only gathered every three to five years and is voluntary, making the sample size relatively small. It also does not gather information about the characteristics of residential rental property owners. So, while this survey is helpful for municipalities to understand resident perceptions of housing and thus helps the municipalities understand gaps in housing stock, it does not provide all the information needed to support the development, maintenance, and preservation of multi-family affordable housing.

This capstone presents two major recommendations to address these challenges: regularly gather information locally on residential rental property owners in the Bloomington and Normal Urbanized Area in a coordinated way and use this data to support existing affordable housing activities for residential property owners and renters. Although local housing studies have not explicitly recommended regularly gathering additional property characteristics and owner data, other elements of these documents and local housing events indicate gaps in housing data, especially for individuals with disabilities. In addition, data on naturally occurring affordable housing (NOAH) overall is not readily available. Therefore, it would be helpful to gather information from all residential rental property owners. Still, more information is needed on owners of federally assisted housing and naturally occurring affordable housing and the characteristics of these properties.

For federally assisted housing, it is critical to gather information on who owns the property because it may impact the long-term affordability of income-restricted units. Recent studies have shown that properties developed using the Low Income Housing Tax Credit Program (LIHTC) that for-profit organizations own are more likely to prematurely lose their rent restrictions or end affordability contracts after the minimum requirements of the LIHTC program (Meléndez et al, 2008). For example, one of the properties developed by the Low Income Housing Tax Credit program (LIHTC) in Normal left the program prematurely, which resulted in the loss of 167 income-restricted units in 2020. Unfortunately, the Regional Housing Initiative and its stakeholders were unaware of this change until 2021. This occurrence, while rare, indicates the need to gather property owner information and property characteristics information at the local level on a more regular basis. I explore this topic further in the next challenge.

Requesting additional information from property owners who do not participate in federal housing programs is also essential. National data indicate that naturally occurring affordable housing stock makes up 76 percent of the affordable housing stock in the United States (Pyati, 2016). Additionally, at the federal level, local residential rental property owners, also known as individual investors, made up 72 percent of rental owners in 2017. These property owners often manage a handful of rental properties and spend more on properties than non-individual investors. In 2017, 30 percent of individual investor property owners had improvements costing at least $3,000, nearly double that of non-individual investors (Joint Center for Housing Studies, 2022). In McLean County, no comprehensive study has been conducted to identify the share of individual and/or local residential rental property owners and their challenges to maintaining their properties. However, they likely play a vital role in affordable rental housing. Given McLean County's aging rental stock, the struggles "small" landlords have faced during the pandemic, and the importance of small landlords in NOAH stock, the Regional Housing Initiative would be well-served to gather information on these property owners to understand their needs, where their housing is located, and the gaps in and quality of NOAH. This information could help inform local housing policies and investments to support local landlords in preserving NOAH.

Local and timely data will help the Regional Housing Initiative better understand property owners and the housing stock, which will help them develop housing policies and plan more targeted housing investments that address the community's needs (McLean County Regional Planning Commission, 2021). In addition, housing professionals can use these data to implement the other recommendations outlined in this capstone. For example, understanding the characteristics of residential rental property owners may help support creating a new affordable housing organization in McLean County, as highlighted in Challenge 2, or identify what inclusionary housing policies could be appropriate, as identified in Challenge 3. Data is a critical way to measure gaps and problems and gather metrics to understand the outcomes of implemented housing solutions. Overall, the data collected and used for housing planning in McLean County is important but lacks the critical information needed to support a more robust affordable housing market and address the concerns expressed by the Regional Housing Initiatives committees.

Recommendation 1.I - Regularly gather information locally on residential rental property owners in the Bloomington and Normal Urbanized Area in a coordinated way

Implementation Strategies:

a. Identify the information that the Regional Housing Initiative would benefit from gathering **annually**. This information could include the rent for each unit, accessibility of units, vacancies, the reason for vacancy, and investments to improve the units. The Renter's Alliance Rental Registration Questionnaire[10] is a potential resource that could help the committee identify the needed data.

b. Identify information that should be collected on a **semi-regular basis** (every 2-5 years) from property owners. This information should likely include property owners' interests, whether social or supportive services are available on-site, the need for financial support to maintain the property, and willingness to coordinate with the Regional Housing Initiative to leverage funding. The Census Bureau and HUD's U.S. Rental Housing Finance Survey (RHFS)[11] could be a resource to support this effort.

c. Determine the most cost-effective and efficient way to gather this information to ensure its accuracy and reduce the reporting burden for local and smaller property owners. For example, the committee could explore online property owner management systems, such as CitizenServe[12], to achieve this.

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[10] This document can be retrieved from https://bhrentersalliance.org/wp-content/uploads/2017/08/Registry-forms-private-large.png (2017)

[11] This document can be found under the Technical Documentation for this survey which can be retrieved from https://www.census.gov/programs-surveys/rhfs/technical-documentation.html

[12] This resource can be found at https://www.citizenserve.com/municipal-software-solutions/rental-registrations/

d. Streamline and coordinate the City of Bloomington and the Town of Normal's rental registry programs to ease data analysis and reduce the burden on property owners. To achieve this, the City and Town councils would both need to approve a change in the registration processes.

Recommendation 1.II - Leverage data to support existing multi-family affordable housing activities for both residential property owners and renters

Implementation Strategies:

a. Develop strategies using collected data to identify property owners of naturally occurring affordable housing (NOAH) and their needs, including property management resources, rehabilitation or preservation support, or tenant screening support.

b. Use data to help implement HB2621. If enacted locally, this policy would essentially reduce the cost burden for residential property owners to improve their rental properties by lowering the assessed value of the improved property.

c. Employ data to support required Fair Housing Activities and non-required activities to address the disparities related to multi-family housing, including inequalities for tenants and property owners. This could include working with Black or African American residential rental property owners to help protect their housing assets, creating a database of properties with accessible housing units for people with mobility-related disabilities, a known but unquantified housing gap, among other activities.

d. Using newly gathered data, determine the need for rent stabilization policies in the Bloomington and Normal urbanized area. If HB116, a bill that repeals the preemption of rent stabilization in Illinois, passes at the state level, this newly collected data would inform the public and elected officials of the implications of rent stabilization in McLean County.

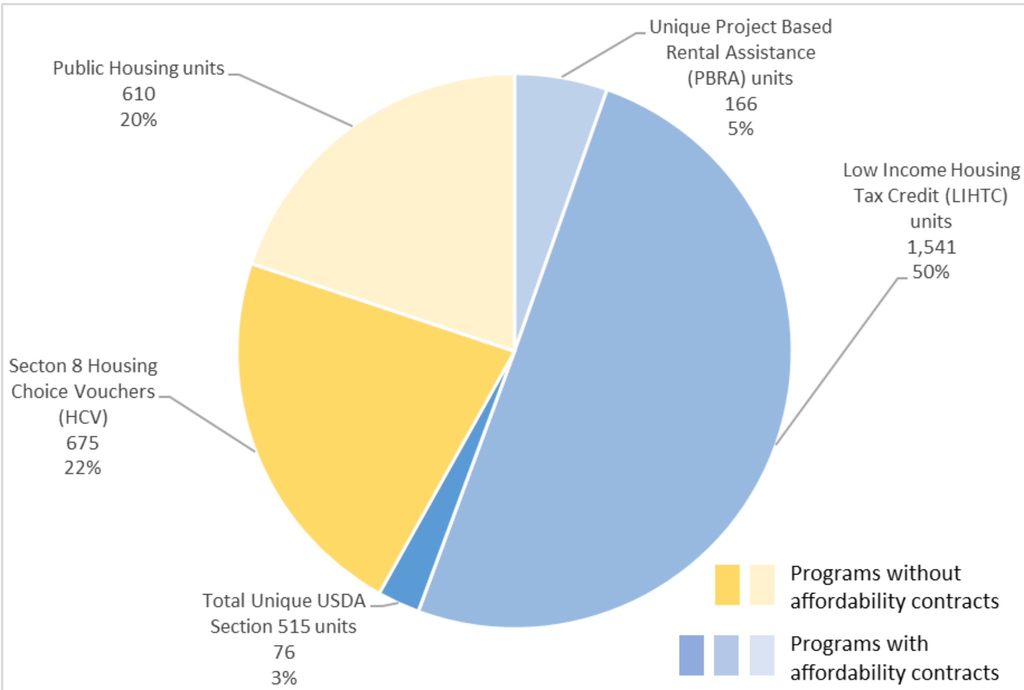
Challenge 2 – Absence of mission-based multi-family affordable housing organizations, especially community-based organizations (CBOs)

Current Context & Related Local Housing Goals

Non-profit organizations have become critical to the affordable housing stock as federal funding has decreased for public housing. Since the decline of public housing, new financing from tax credit programs and block grant programs, such as the HOME Investment Partnership program in 1990, have become the primary source of affordable housing stock, requiring non-governmental entity involvement (Swanstrom, 1999). Although neither Bloomington nor Normal receives funding through the HOME program, the trend of increased income-restricted housing funded by "non-traditional" programs holds true in McLean County. As highlighted in Figure 2, "traditional" federally assisted housing makes up the minority of income-qualified units in McLean County. More than half of the income-restricted housing stock has been developed by programs like the Low Income Housing Tax Credit (LIHTC). These programs require involvement from the for-profit organizations, and in McLean County, very few non-profit organizations are involved as general partners.[13]

[13] The three programs with affordability contracts are the Low Income Housing Tax Credit (LIHTC) program, the Project Based Rental Assistance (PBRA) Program, and the United States Department of Agriculture's (USDA) Section 515 program. In 2020, 1,721 units or 50 percent of all federally assisted housing was financed by the LIHTC program. Of these units, 472 also leverage the PBRA program. There are a total of 166 units that only employ the PBRA program for a total of 640 units of housing supported by the PBRA. The USDA's Section 515 program supports a total of 117 units, 41 of which are also supported by the LIHTC program. By 2030, the affordability contract of 649 units of housing supported by LIHTC, 266 units of housing supported by PBRA, and 27 units of housing supported by the Section 515 program are set to expire.

Figure 2: Income Qualified Units and Vouchers by Program in McLean County (2020)
Source: McLean County Regional Planning Commission. (2020). Income-Qualified Housing in McLean County. *Regional Housing Initiatives.* Retrieved from https://mcplan.org/file/866/Income%20Qualified%20Housing%20Issue%202A%202020.pdf



Although private sector involvement in affordable housing has proven critical for developing income-restricted housing, non-profit sector involvement is crucial to preserving federally assisted units as affordable after their income restrictions expire per program requirements (Illinois Housing Council, 2010). The LIHTC program, project-based rental assistance (PBRA), and USDA Section 515 all have affordability expiration horizons. These units are only guaranteed to be income-restricted for a predetermined time. For example, for the LIHTC program, there are two periods during the program where housing can be converted to non-income restricted housing: at the 15-year and 30-year marks, when the program effectively ends and the income restrictions are no longer required.

The first 14 years of the LIHTC program are known as the initial compliance, and at the 15-year mark, the qualified contract process can be initiated. This process allows the LIHTC property owner to purchase the property for a qualified contract price (Minnesota Housing Agency, 2015).[14] A 2012 HUD study concluded that LIHTC properties developed in strong housing markets were more likely to initiate the qualified contract process. Overall, a very small portion of properties completed the qualified contract (Office of Policy Development and Research, 2012). However, as more housing markets become increasingly competitive, affordable housing stakeholders have growing concerns about this qualified contract process. Recent analysis indicates that 10,000 low-income units are lost prematurely to this process annually (National Council of State Housing Agencies, 2021). As highlighted in Challenge 1, 167 affordable housing units developed through the LIHTC program in Normal left the program through the qualified contract process. This indicates that this concern about the premature loss of LIHTC properties has reached McLean County. Non-profit stakeholders could be a critical tool to combat this problem. Recent studies have shown that LIHTC projects at the 15-year point were more likely to remain affordable if non-profit organizations were the general partners rather than private investors (Meléndez et al, 2008).

Another critical point for LIHTC properties is the 30-year mark. This is the end of the federal extended use restriction period. At this point, the previously income-restricted units can be converted to market-rate housing. Many developments at this point have significant capital improvement needs, and the potential value of repositioning the property to commercial use or market-rate units is often significantly greater than maintaining affordable units. This

[14] The LIHTC property owner can buy the property after a one-year period where the Housing Finance Agency, in Illinois this is the Illinois Housing and Development Authority, seeks a potential new owner to maintain the affordability of the housing. If the agency cannot find a new buyer, the current LIHTC owner can exit the LIHTC program, which removes the income restrictions for the units.

incentivizes LIHTC property owners to reposition rent-restricted housing to market-rate units rather than seek further programs to preserve the long-term affordability past this 30-year extended use restriction period. This is particularly concerning for McLean County because there are limited mission-based and locally-based affordable housing organizations and no multi-family affordable housing organizations aside from the public housing authority. Some LIHTC property owners in McLean County have expressed interest in maintaining affordability for units after the 30-year affordability period (McLean County Regional Planning Commission, 2021). However, without contracts guaranteeing the long-term affordability of units and mission-based organization involvement, the long-term affordability of properties developed with the support of the LIHTC, USDA Section 515, or PBRA, relies on the goodwill of private companies.

The Regional Housing Initiative has identified the preservation of federally assisted housing units with affordability horizons as a challenge. However, in planning documents, MCRPC, the City, or Town has not formally identified the lack of mission-based and local affordable housing organizations. The exploration of creating such an organization was identified as an objective in Bloomington Public Housing Authority's 5-Year PHA Plan Summary (2020): "Objective 4.2: Evaluate the need to revive or form a new not-for-profit organization for affordable housing development" (McLean County Regional Planning Commission, 2021). To expand on this objective identified by the Bloomington Public Housing Authority, Challenge 2, "Absence of mission-based multi-family affordable housing organizations, especially community-based organizations (CBOs)," was identified.

Many different organization types support multi-family affordable housing. Institutionally, there are three major categories or types of non-profit organizations that help finance, develop, and/or manage federally assisted multi-family housing: Community

Development Corporations (CDCs), Community Housing Development Corporations (CHDOs), and Community Development Financial Institutions (CDFIs). There are currently no operating CDCs, CHDOs, or CDFIs in McLean County. Another resource for mission-based affordable housing resources is national non-profit organizations that support housing non-profits through training, funding, technical assistance, and other services that help support multi-family affordable housing development, maintenance, and preservation. These organizations include NeighborWorks, Housing Assistance Council, Local Initiatives Support (LISC), Enterprise Community Partners, Rural Community Assistance Corporation (RCAC), Community Investment Corporation (CIC), Community Housing Partners, Community Housing Innovations, and others. These institutions are critical for building local organizations' financial and technical capacity to develop, maintain, and preserve multi-family affordable housing. In McLean County, these national organizations have limited impact on the community due to their minimal involvement with local organizations. One Bloomington-based organization, Mid Central Community Action Agency (MCCA), is a member of NeighborWorks. However, MCCA's mission focuses explicitly on single-family housing support, such as housing counseling. Although single-family housing services are critical to affordable housing, it does not fill the gap for local mission-based multi-family affordable housing organizations. Because McLean County lacks a multi-family affordable housing organization that is a member of a national capacity building organization, these non-federally funded opportunities to support multi-family affordable housing and a wide variety of other community development resources are effectively inaccessible.

Overall, McLean County's lack of mission-based multi-family housing organizations could impact the preservation of federally assisted housing with affordability expiration horizons and the communities' ability to develop affordable housing. This is because the most recent Qualified Action Plan (QAP), published by the Illinois Housing and Development Authority, awards extra points for non-profit organization participation (Illinois Housing Development Authority, 2021). To face this challenge, this capstone recommends supporting the creation of a local community-based organization that supports multi-family affordable housing and examining how non-profit or for-profit mission-based organizations around the state or country could be used to support multi-family affordable housing in McLean County.

Recommendation 2.I - Support the creation of a local community-based organization that supports multi-family affordable housing

Implementation Strategies:

a. Leverage existing resources to determine the characteristics of a community-based organization that specifically develops, manages, maintains, and preserves multi-family affordable housing. For example, although the City and Town do not receive HOME funds and thus do not need to designate a CHDO, the Regional Housing Initiative could use CHDO criteria outlined by HUD in 24 CFR Part 92 and 2 CFR part 200 to identify those characteristics. An example of a checklist that outlined CHDO criteria was developed by the City of Rockford.[15]

b. Use these criteria to identify which organizations in the community may be primed to become more involved in multi-family affordable housing. If no organizations seem prepared, identify community members who may be professionally qualified to advise on the next steps to support a new organization's development. These individuals may be real estate brokers, lenders, contractors, construction-based businesses, existing

[15] See this resource here "CHDO Commitment Requirements Checklist 11.30.2020", retrieved from https://rockfordil.gov/chdo-commitment-requirements-checklist-11-30-2020-2/

landlords, or multi-family property owners. MCRPC has already identified the need to measure the capacity of existing organizations to understand service gaps in the 2017 BN Regional Housing Plan (72). Still, this survey might also potentially identify organizations with the network, staff, and capacity to get involved in multi-family affordable housing.

c. Identify how to implement national and state innovative non-federal funding opportunities to support existing organizations to develop the capacity to be involved in multi-family affordable housing using national organizations such as Community Development Financial Institutions, LISC, NeighborWorks, etc.

Recommendation 2.II - Examine how non-profit or for-profit *mission-based* organizations around the state or country could be leveraged to support multi-family affordable housing in McLean County

Implementation Strategies:

a. Examine the mission-based organizations invested in McLean County affordable housing efforts or other similarly sized markets. This might include how CDFIs have been involved in McLean County development activities or if LISC Peoria previously supported community development in McLean County.
b. Use existing planning documents and housing studies to bring to discussions with mission-based organizations to support the need for development in McLean County. This might include working with the Regional Housing Initiative to update the BN Regional Housing Study.
c. Network with other mid-sized cities that have benefited from national mission-based organizations to chart the next steps in bringing resources to McLean County.

Challenge 3 – The lack of leveraging complex funding opportunities and implementing explicitly inclusionary housing policies

Current Context & Related Local Housing Goals

The City of Bloomington, Town of Normal, and Regional Housing Initiative are well prepared to apply for grants and implement housing programs. This is demonstrated by their success in developing Consolidated Plans, implementing CDBG and CDBG-CV funds, being awarded funding from the Illinois Housing and Development Authority (IHDA), applying for research grants, and working collaboratively to apply for Continuum of Care (CoC) funds. The need to implement innovative housing solutions, such as inclusionary housing policies, leveraging complex funding sources, and utilizing resource support policies like the Community Reinvestment Act (CRA), has been limited. However, the housing market has changed dramatically in recent years. According to the Bureau of Labor Statistics, the national average rent has increased by 18 percent over the last five years, outpacing inflation (Schaeffer, 2022). And data compiled by the National Association of Realtors indicates that rent is rising faster in the Bloomington urbanized area compared to the nation (National Association of Realtors, 2021). The increasing housing cost has gained the attention of residents and community leaders, particularly as Rivian, the rapidly growing electric vehicle company, has brought new high-wage jobs and an influx of new residents (McFarland, 2021). Additionally, as identified in BN Regional Housing Study, student housing has consistently driven up residential housing costs, and federally assisted affordable housing stock has decreased year-over-year (McLean County Regional Planning Commission, 2020). Furthermore, new housing construction has stagnated across the county, a trend also seen in Mclean County (Bloomington-Normal Economic Development Council, 2022; McLean County Regional Planning Commission, 2017).

Compounding these issues are the economic impacts of the COVID-19 pandemic, which have exacerbated the rising unaffordability of housing in McLean County (Healther, 2021).

These changes in the housing market have a disproportionate impact on low- to moderate-income renters. Even before COVID-19, in McLean County, low- to moderate-income households were more likely to rent than higher-income households, and renters were more likely to be cost-burdened by their housing expenses (City of Bloomington, 2014). Additionally, the cost of housing is more volatile for renters than homeowners, which has compounded the overall economic volatility these past few years have brought on. This puts the burden of the changing housing market most squarely on the shoulders of low- to moderate-income households. This also has substantial implications for racial equity in McLean County. Black or African Americans and Hispanic populations encompass a disproportionate number of renters in the Bloomington Metro Area. According to 2020 ACS 5-year estimates, Black or African American households make up approximately 7.5 percent of the population in the Bloomington Metro area, but 16 percent of renter-occupied units. Hispanic or Latino residents make up 3.6 percent of the population but account for 5 percent of the renter-occupied units (Table DP04). While the racial and ethnic homeownership gap is a multifaceted issue that cannot be addressed alone by the multi-family affordable housing sector, these data highlight how the diminishing housing stock disproportionately impacts racial minorities, low-income households, and other vulnerable populations. Leveraging complex financing to develop and preserve affordable rental housing, paired with other innovative housing policy changes, will help stabilize the rental housing market and support marginalized households who rent. Of course, this is a "Band-Aid" measure, and closing the racialized housing and economic disparities in McLean County will require further inter-jurisdictional efforts to examine and ameliorate the historical policies that have led to the marginalization of racial and ethnic minorities, low- and moderate-income households, people with disabilities, among others. This will include housing policies outside the scope of this capstone, such as homebuying programs and other multisector efforts involving social, political, and economic policies.

Regarding bolstering multi-family affordable rental housing, many complex housing funding opportunities and policies can increase the county's capital available for affordable housing. These include navigating the Community Reinvestment Act (CRA) to work with financial institutions to finance affordable housing solutions, exploring options for leveraging complex funding options to support local housing resources, and implementing inclusionary housing policies. The three recommendations below build on previous recommendations outlined in the BN Regional Housing Study (2017).

The first of these recommendations, "Examine the implications of the Community Reinvestment Act (CRA) in McLean County," is particularly pertinent because CRA has been changing in recent years. Initially, CRA was enacted in 1977 to combat redlining and encourage financial institutions to "help meet the credit needs of the communities in which they are chartered, including low- and moderate-income (LMI) neighborhoods, consistent with the safe and sound operation of such institutions" (The Office of the Comptroller of the Currency, n.d.). To do so, banks are assessed using various exam methods in their assigned assessment areas based on their size and business models. The exam methods include lending, community development, investment, and service tests. Using these tests, regulators assign the bank an overall rating based on a four-tiered system: "outstanding" and "satisfactory" are passing ratings, while "needs to improve" and "substantial noncompliance" are failing ratings. Activities that support a bank's CRA efforts include financing affordable housing development, sponsoring financial workshops, creating special credit financing opportunities for homebuyers, and various other activities.

Municipalities and mission-based organizations are critical to implementing CRA because they assist lending institutions in identifying community needs, developing community development opportunities, and creating innovative banking programs that help banks fulfill their CRA obligations and meet the needs of low- to moderate-income households. In addition, CRA ratings are shared with the public. This information can assist local organizations in identifying which banks to work with for supporting CRA activities. The three federal regulating bodies of financial institutions[16] also consider this information when analyzing mergers, acquisitions, and branch openings for financial institutions.

Historically, in McLean County, leveraging a bank's CRA obligations may have been limited due to how assessment areas are outlined for banks' CRA activities. Currently, a bank's assessment area is an "area that can reasonably be served by each of a bank's locations, including its main office, any branches, and deposit-taking ATMs and where the bank originated or purchased a substantial portion of its loans." Areas, where banks have the bulk of their deposits, require "full scope" assessments and areas where fewer activities occur only require "limited scope" assessments, which have a minimal impact on a bank's CRA rating. This poses a problem for smaller communities because they are unlikely to fit within a bank's "full scope" assessment area which limits the banks incentive to work with local stakeholders to create housing or community development solutions to bolster CRA ratings. In McLean County, the most recent CRA assessments have indicated that Bloomington and Normal MSA are often considered "limited scope" assessment areas for the top seven banks with the largest depository

[16] These institutions are the Office of the Comptroller of the Currency (OCC), the Federal Reserve Board (FRB), and the Federal Deposit Insurance Corporation (FDIC)

shares, see Figure 3. These seven banks make up over 80 percent of the local market share, indicating their outsized impact on the community, despite their lack of meaningful CRA assessments for the area.

Figure 3: Market Share of Banks Bloomington MSA (as of June 30th, 2021)
Source: FDIC. (2021). "Deposit Market Share Report". Retrieved from https://www7.fdic.gov/sod/sodMarketRpt.asp?barItem=&sCounty=all

		Outside of Market		Inside of Bloomington/Normal Market				
Institution Name	**State/ Federal Charter**	**No. of Offices**	**Deposits ($000)**	**No. of Offices**	**Deposits ($000)**	**Market Share**	**CRA Rating (Year of Exam)**	**BN MSA Assessment Type**
Commerce Bank	State	163	26,961,041	**4**	**777,525**	**19.40%**	**Satisfactory (2000)**	**Limited Scope**
Heartland Bank and Trust Company	State	54	2,789,921	**9**	**667,426**	**16.65%**	**Satisfactory (2021)**	**Limited Scope**
PNC Bank, National Association	Federal	2,133	368,002,036	**5**	**576,297**	**14.38%**	**Outstanding (2018)**	**Limited Scope**
Busey Bank	State	76	8,645,862	**4**	**484,157**	**12.08%**	**Satisfactory (2019)**	**State of Illinois is a full-scope assessment area**
JPMorgan Chase Bank, National Association	Federal	4,923	2,010,942,09	**2**	**401,908**	**10.03%**	**Satisfactory (2013)**	**Limited Scope**
U.S. Bank National Association	Federal	2,317	422,616,243	**2**	**156,063**	**3.89%**	**Outstanding (2017)**	**Limited Scope**
First State Bank of Bloomington	State	0	0	**2**	**144,197**	**3.60%**	**Satisfactory (2020)**	**McLean County Assessment Area[17]**

Total Market Share 80.03%

[17] McLean County (designated assessment area) - Interagency Small Institution Evaluation

Another criticism from CRA proponents is that a great majority of banks, 98 percent of them, receive a passing rating, despite the persistent gaps in credit access for LMI populations (Mullin, 2022). Because of these criticisms, and many others, community development and financial institution stakeholders have called for revisions to CRA in recent years. Starting in 2018, the first effort to update CRA in a meaningful way since 1995 was initiated. The OCC published a Final Rule to update CRA in June of 2020. However, it was rescinded in December 2021. And on May 5th, 2022, the OCC, FRB, and FDIC issued an Interagency Notice of Proposed Rulemaking with a variety of significant proposed changes to CRA. Given these changes and the lack of previous CRA activities in McLean County, the Regional Housing Initiative would be well-served to track CRA changes and build relationships with lenders to support affordable housing in McLean County as they adjust to new regulations.

The second recommendation involves investigating options to leverage complex funding opportunities made available through the Government National Mortgage Association (Ginnie Mae) and Government Sponsored Enterprises: Federal National Mortgage Association (Fannie Mae) and the Federal Home Loan Mortgage Corporation (Freddie Mac). Leveraging these resources can be complicated because none of these agencies directly lend to housing developers. Instead, they purchase, package, and guarantee multi-family mortgage loans originated by third-party lenders or sell bonds on the securities market (Kaul, 2015). Thus, leveraging this funding will involve working with a multipronged group of stakeholders, including, but not limited to, qualified lenders, investor partners, and developers.

Similarly, HUD's Rental Assistance Demonstration (RAD) program requires the involvement of public-private partnerships (PPPs) to acquire funding and convert public housing to Section 8 housing with contracts that are renewed in perpetuity (US Department of Housing and Urban Development, 2022). These recommendations align with the 2020 Five-Year and Annual Public Housing Agency (PHA) Plan of the BHA, highlighting the Housing Authority's goal to increase affordable housing stock using mixed-finance housing options (12). To use these opportunities and prepare for the increasing reliance on public-private partnerships to support affordable housing in McLean County, the Regional Housing Initiative would benefit from identifying training needs and opportunities to bolster innovative housing financing expertise. This also aligns with the BHA's Plan and Objective 5.3, which "continue to develop staff and board expertise in the financial elements of federal housing programs for better long-term fiscal planning within the agency" (12).

The final recommendation to address Challenge 3 is to investigate inclusionary housing policies. Seeking out and applying for grants or other forms of capital often takes center stage in affordable housing because it plays an outsized role in a municipalities' ability to implement solutions. However, housing-oriented policies and ordinances also play a critical role in supporting the efforts of the Regional Housing Initiative and increasing multi-family affordable housing stock. Changing ordinances and local policies to support affordable housing and multi-family developments can take many forms: abolishing single-family housing zoning, requiring affordable housing units to be incorporated in all new developments, and updating ordinances to allow accessory dwelling units (ADUs) are some of the most publicized examples. These policy changes are known as forms of inclusionary housing.

Inclusionary housing policies can serve a wide variety of purposes. Some municipalities enact policies to attract housing development, bolster affordable housing supply, support more equitable homeownership policies, or combat gentrification (Reyes & Wang, 2021). This is to say that policies do not need to be only targeted to support affordable housing, and inclusionary housing can be multifaceted to address the community's unique needs. In McLean County and across the country, housing supply has been a growing concern. As highlighted above, housing construction, especially multi-family housing construction, has slowed in recent years. For planning professionals, zoning and other inclusionary policies have gained recognition to combat this problem. These policy changes have recently taken hold at the Federal level and were promulgated through the Housing Supply Action Plan, released by the White House in May 2020. The plan aims to close the housing supply gap in five years through various policy initiatives, among them, promoting inclusionary housing policies. Additionally, it outlines potential funding opportunities to implement these solutions moving forward, including developing FHA and FHFA loans targeted to create ADUs and financing the expansion of competitive grants that fund inclusionary housing planning (The White House, 2022). Locally, planners have identified revising zoning and ordinances to support accessory units and support transit-oriented development as implementation strategies to improve the housing market in McLean County (89). However, concrete steps to doing so are limited.

Inclusionary housing can encompass a wide variety of housing policies unique to each community's needs. Updating the local zoning code to support accessory dwelling units (ADUs), reducing parking minimums for housing developments, or abolishing single-family zones are just a few of the many inclusionary housing policies that could impact the availability and affordability of multi-family housing in McLean County. Expanding on these policies and investigating other inclusionary housing policies could support the short-term and long-term production of affordable multi-family housing.

Recommendation 3.I: Examine the implications of the Community Reinvestment Act (CRA) in McLean County

Implementation Strategies:

a. Monitor changes in CRA as the new Final Rule is published and develop a white paper on the Community Reinvestment Act to share with the Regional Housing Initiative and the public.
b. Track potential financial institutions in the area with a large deposit share and compile their CRA ratings and how they are explicitly rated on lending in McLean County.
c. Communicate with local lenders and CRA Compliance Bankers to determine strategies to support affordable housing, specifically multi-family affordable housing.

Recommendation 3.II: Evaluate complex funding opportunities and the capacity of municipalities and organizations to do so

Implementation Strategies:

a. Develop relationships with other municipalities and affordable housing developers who have used GSE funding for public housing improvements, LIHTC property preservation, and other multi-family affordable housing efforts.
b. Research the Rental Assistance Demonstration (RAD) conversion program and its implication so Bloomington Housing Authority housing.
c. Examine the possibility of structuring local policies to support public-private partnerships for affordable housing development and preservation efforts, including RAD conversion efforts, securing GSE financing, developing future LIHTC projects, etc. This could include creating local enabling policies for PPPs or developing a guidebook for navigating PPPs for multi-family affordable housing development in McLean County.[18]

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[18] This implementation strategy expands upon two implementation strategies from the BN Regional Housing study, ”6.1A. Work with developers and community stakeholders including lenders, potential owners and renters, building code officials, and municipal leadership to create funding strategies to implement infill development solutions that accomplish the goals in this report” and “6.1D. Create a curriculum with Illinois Housing Development Authority, Bloomington Housing Authority, and other housing advocacy groups to present housing options to developers along with opportunities for public/private collaboration on affordable housing projects” (79).

a. Identify which affordable housing stakeholders would be best served to undertake financing training.

b. Identify appropriate financing training opportunities and potential funding sources to finance training. Below are common institutions that provide training opportunities for complex financing options:

    a. Council of Development Finance Agencies (CDFA)[19]

    b. Novogradac[20]

    c. Fannie Mae Learning Library[21]

Recommendation 3.III: Investigate inclusionary housing policies and implications of these policies and disseminate information to the public and elected officials

Implementation Strategies:

a. Coordinate with city planners from the City and the Town to develop a white paper on the zoning ordinances that support or diminish inclusionary zoning efforts in the City of Bloomington and the Town of Normal.

b. Inform the public about inclusionary zoning and its implications on impacting affordable housing

c. Present information on inclusionary zoning to municipal employees and elected officials in city council meetings.

d. Identify housing in the City and Town that could be viable units to develop Accessory Dwelling Units (ADUs) using GIS mapping and land surveying.

e. Identify funding sources for homeowners to develop and maintain ADUs.

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[19] CDFA - https://www.cdfa.net/
[20] Novogradac - https://www.novoco.com/
[21] Fannie May Learning Library - https://multifamily.fanniemae.com/learning-center/learning-library

f. Develop ADU owner support resources, including support for rehabilitation of potential units, checklists for owners to establish their ADU, marketing support, etc. (i.e., the Community Investment Corporation's (CIC) Property Management Training Toolkit[22])

a. Examine other inclusionary housing policies and how they might support multi-family affordable housing development and preservation, including:
    a. Establishing a revolving loan fund
    b. Minimizing parking requirements for developers
    c. Set minimum number of affordable or income-restricted units for new multi-family housing developments

Conclusion

Multi-family affordable housing is a critical aspect of the housing market in McLean County. However, developing and preserving this vital resource can be complicated, involve inter-jurisdictional and multisector cooperation, and require extensive capital. Therefore, the primary goal of this capstone was to identify funding opportunities and programs available for developers and municipalities to develop and preserve multi-family affordable housing. To do so, this research explored the history and background of federally assisted housing and the U.S. Department of Housing and Urban Development to better inform the political and historical context for current programs. Then, the local context for the development of the Municipal Housing Resource Guide was outlined, including the definition of affordable housing, local affordable housing topics, and the creation and priorities of the Regional Housing Advisory Committee. The proceeding section of this capstone outlined the process of developing the

[22] This resource can be found here: https://www.cicchicago.com/wp-content/uploads/2020/06/PropertyManagementTrainingToolkit.pdf

Guide, which included a description of the current federally assisted housing landscape and the tools and resources used to create the Guide.

After I presented the guide, the recommendations section outlined local challenges in McLean County outside of federal and state funding. These three challenges were informed by the various existing planning documents and organizational plans in McLean County. The challenges identified were the unavailability of timely and locally sourced data on multi-family housing providers and residential rental property characteristics, the absence of mission-based multi-family affordable housing organizations, especially community-based organizations (CBOs), and the lack of complex funding opportunities and implementing explicitly inclusionary housing policies. Although these are not the only challenges faced by the multi-family housing sector in McLean County, they are essential to the implementation of the funding resources outlined in the Municipal Housing Resource Guide.

Overall, the housing market in McLean County, especially the Bloomington and Normal urbanized area, has been changing dramatically in recent years. Like much of the country, housing prices are rising, and those most impacted by this change are often low- to moderate-income households, renters, and marginalized populations. To ensure that the housing stock in McLean County fits the needs of all residents, developers, municipalities, other governmental agencies, and mission-based organizations in McLean County have begun to investigate ways to increase housing stock. The multi-family affordable housing stock is just one of the many components of a complex system. The capstone aimed to support this effort identified by the Regional Housing Initiative to support the development, maintenance, and preservation of multi-family affordable housing stock.

References

Axelson, L. J., & Dail, P. W. (1988). The Changing Character of Homelessness in the United States. Family Relations, 37(4), 463–469. https://doi.org/10.2307/584121

Bennett, R., Bernstine, N. (2017). Housing Opportunities for Persons with AIDS (HOPWA). 2017 NLIHC Advocates Guide. Retrieved from http://nlihc.org/sites/default/files/AG-2017/2017AG_Ch04-S03_Housing-Opportunities-for-Persons-with-AIDS-HOPWA.pdf

Bennon, M, Kim, J. Levitt, R. (2017). U.S. Infrastructure Gap(s): Federal Policy and Local Public Institutions. In Press.

Bibri, S. E., & Krogstie, J. (2021). Data-driven smart sustainable cities of the future: A novel model of urbanism and its core dimensions, strategies, and solutions.

Blasco, A. (2015). Continuum of Care Planning. National Low Income Housing Coalition. Retrieved from http://nlihc.org/sites/default/files/Sec7.04_Continum-of-Care_2015.pdf

Bloomington-Normal Economic Development Council. (2022). Regional Housing Market Analysis. Retrieved from https://npr.brightspotcdn.com/69/5d/501447894b7cb83e9117e436d098/bloomington-normal-housing-analysis-white-paper-april-2022.pdf

Boeing, G & Waddell, P. (2016). New Insights into Rental Housing Markets Across the United States: Web Scraping and Analyzing Craigslist Rental Listings. 10.13140/RG.2.1.2876.1841.

Bostic, R., & Acolin, A. (2017). The potential for HUD's Affirmatively Furthering Fair Housing rule to meaningfully increase inclusion. This volume.

Britannica, The Editors of Encyclopedia. (2015) Reconstruction Finance Corporation. Encyclopedia Britannica. Retrieved from https://www.britannica.com/topic/Reconstruction-Finance-Corporation.

Bromley, R., & Daniels, T. (2001). Metropolitan regional planning in the United States. Planning Practice and Research, 16(3-4), 229-232.

Calabro, A., Patton, N., Saadian, S. (2020) Housing is Healthcare. National Low-Income Housing Coalition. Retrieved from https://nlihc.org/sites/default/files/FEMA_Housing-Is-Healthcare.pdf

City of Bloomington. (2014). Consolidated Plan, Program years 2015 – 2019. Retrieved from https://www.cityblm.org/home/showpublisheddocument/23395/637081173582030000

City of Bloomington. (2015). Economic Development Chapter from City of Bloomington Comprehensive Plan Retrieved from https://mcplan.org/plans-and-studies/economic-development#:~:text=Bloomington%20Comprehensive%20Plan-

,Economic%20Development%20Chapter%20from%20City%20of%20Bloomington%20Comprehensive%20Plan,-August%202015

City of Bloomington. (2015). Neighborhoods Chapter from City of Bloomington Comprehensive Plan Retrieved from https://mcplan.org/file/239/Chapter%204_Neighborhoods.pdf

City of Bloomington. (2021). Rental Property Program. Retrieved from https://www.cityblm.org/government/departments/building-safety/rental-property-program

Code of Federal Regulations. (1968) Civil Rights Act of 1968 § Title 42. The Public Health and Welfare, Chapter 45 Fair Housing Sub Chapter I. Generally, U.S.C. § 3608. Administration

Committee on Housing and Urban Development. (1974). Development of State Housing Finance Agencies. Real Property, Probate and Trust Journal, 9(4), 471–491. http://www.jstor.org/stable/20781337

Conduent Healthy Communities Institute, Clarita's, 2019

Congressional Budget Office. (1988). Current Housing Problems and Possible Federal Responses. Retrieved from https://ir.lawnet.fordham.edu/cgi/viewcontent.cgi?article=1351&context=ulj

Conlan, T. (2006). From cooperative to opportunistic federalism: Reflections on the half-century anniversary of the commission on intergovernmental relations. Public Administration Review, 66(5), 663-676.

Department of Housing approved. (1966). CQ almanac 1965 (21st ed.). http://library.cqpress.com/cqalmanac/cqal65-1259346

Edson, C. L. (2011). Affordable Housing—An Intimate History. Journal of Affordable Housing & Community Development Law, 20(2), 193–213. http://www.jstor.org/stable/41429169

FDR Library. (2012). 75th Anniversary of the Wagner-Steagall Housing Act of 1937. Retrieved from https://www.fdrlibrary.org/housing

Federal Home Loan Bank of Chicago. (2022) About Us Retrieved from https://www.fhlbc.com/about-us

Freemark, Y., Steil, J., & Thelen, K. (2020). Varieties of Urbanism: A Comparative View of Inequality and the Dual Dimensions of Metropolitan Fragmentation. Politics & Society, 48(2), 235–274. https://doi.org/10.1177/0032329220908966

Greene, H. (1967). Planning Effectiveness and 701: an Evaluation. Prepared for the U.S. Department of Housing and Urban Development. Retrieved from https://www.huduser.gov/portal/publications/Planning-Effectiveness-and-701-an-Evaluation.html

Harvard Kenndy School. (2020). The State of the Nation's Housing 2020. Joint Center for Housing Studies of Harvard University. Retrieved from https://www.jchs.harvard.edu/sites/default/files/reports/files/Harvard_JCHS_The_State_of_the_Nations_Housing_2020_Report_Revised_120720.pdf

Hawkins, B. W., & Dye, T. R. (1970). Metropolitan Fragmentation: A Research Note. Midwest Review of Public Administration, 4(1), 17–24. https://doi.org/10.1177/027507407000400103

Heather, K. (2021). Watch Now: A Roller Coaster Year for McLean County economy. The Pantagraph. Retrieved form https://pantagraph.com/business/local/watch-now-a-roller-coaster-year-for-mclean-county-economy/article_2cf0f545-db69-5692-aab7-59e48c74437b.html

Henig, J. R. (1989). Privatization in the United States: Theory and Practice. Political Science Quarterly, 104(4), 649–670. https://doi.org/10.2307/2151103

Herbert, C. Hermann, A. McCue, D. (2017). In Defense of the 30 Percent of Income to Housing Affordability Rule–In Some Cases. Shelterforce. Retrieved from https://shelterforce.org/2017/04/25/defense-30-percent-standard-cases/

Hoffman, R. L. (1975). REGIONAL PLANNING AND A-95 REVIEW. Real Property, Probate and Trust Journal, 10(4), 670–674. http://www.jstor.org/stable/20780965

Illinois Department of Employment Security. (2021). Illinois Unemployment Rate by County June 2021. Retrieved from Illinois Unemployment Rate by County

Illinois Department of Human Service. (2022). FY20 Emergency Solutions Grant (ESG) Program. Retrieved from https://www.dhs.state.il.us/page.aspx?item=115823

Illinois Department of Public Health. (2022). Ryan White CARE and HOPWA Services. Retrieved from https://dph.illinois.gov/topics-services/diseases-and-conditions/hiv-aids/ryan-white-care-and-hopwa-services

Illinois Finance Authority. (2022). About IFA. Retrieved from https://www.il-fa.com/about

Illinois Housing and Development Authority. (2021). Qualified Allocation Plan. Retrieved from https://www.ihda.org/wp-content/uploads/2021/09/QAP_2022-2023_Website.pdf

Illinois Housing Council. (2010). The Low Income Housing Tax Credit Program in Illinois. Retrieved from https://www.ilhousing.org/wp-content/uploads/2018/01/LIHTC_state_summary.pdf

Joint Center for Housing Studies. (2022). America's Rental Housing 2022. Harvard University. Retrieved from https://www.jchs.harvard.edu/sites/default/files/reports/files/Harvard_JCHS_Americas_Rental_Housing_2022.pdf

Jones, K. (2021). An Overview of the HOME Investment Partnership Program. Congressional Research Service. Retrieved from https://sgp.fas.org/crs/misc/R40118.pdf

Jones, M. (2017). PAS Memo: Data-Driven Housing Assessments and Action Plans, Part 1: The Data. The American Planning Association. Retrieved from https://planning-org-uploaded-media.s3.amazonaws.com/document/PASMEMO-2017-05-06.pdf

Kaul, K. (2015). The GSEs' Shirking Role in the Multifamily Market. The Urban Institute. Retrieved from https://www.urban.org/sites/default/files/publication/48986/2000174-The-GSEs-Shrinking-Role-in-the-Multifamily-Market.pdf

Knightley, M. (2021). An Introduction to the Low-Income Housing Tax Credit. CRS. Retrieved from https://sgp.fas.org/crs/misc/RS22389.pdf

Massey, D. S. (2015, June). The legacy of the 1968 fair housing act. In Sociological Forum (Vol. 30, pp. 571-588).

McDowell, B. D. (1984). The metropolitan planning organization role in the 1980s. Journal of advanced transportation, 18(2), 125-133.

McFarland, M. (2021). The new Normal: How one Midwestern town got swept up in the electric vehicle boom. CNN Business. Retrieved from https://www.cnn.com/2021/03/24/cars/rivian-illinois-town/index.html

McKinney-Vento Homeless Assistance Act of 1994 § Title 24. Housing and Urban Development, Chapter 5 Office of Assistant Secretary for Community Planning and Development Chapter V. U.S.C. § 11381. Administration

McLean County Government. (2019). Regional Planning. Retrieved from https://www.mcleancountyil.gov/1263/Regional-Planning

McLean County Government. (n.d). Who We Are. Retrieved from https://mcplan.org/about-mcrpc/who-we-are/vision-mission-and-values

McLean County Health Department. (2019). Community Health Needs Assessment. Retrieved from: https://health.mcleancountyil.gov/DocumentCenter/View/3670/2019-McLean-County-Community-Health-Needs-Assessment-PDF

McLean County Regional Planning Commission. (2018). VISIONS Newsletter 2018. Retrieved from https://mcplan.org/file/253/VISIONS%20Summer%202018.pdf

McLean County Regional Planning Commission. (1969). 1969 Annual Report. McLean County Regional Planning Commission. Retrieved from: https://mcplan.org/file/297/1969%20Annual%20Report%20-%201.pdf

McLean County Regional Planning Commission. (1975). Annual Report 1975. Retrieved from https://mcplan.org/file/279/1974%20Annual%20Report.pdf

McLean County Regional Planning Commission. (2009). McLean County Regional Comprehensive Plan. (p. vii) Retrieved from REG_PLAN V7.pub (mcplan.org)

McLean County Regional Planning Commission. (2017). BN Home. Regional Housing Initiative. Retrieved from https://mcplan.org/file/493/2017_BN%20Home_Regional%20Housing%20Study_FINAL.pdf

McLean County Regional Planning Commission. (2018). Bylaws of the McLean County Regional Planning Commission. Retrieved from https://mcplan.org/file/721/Bylaws%20as%20amended%20Feb%202018.pdf

McLean County Regional Planning Commission. (2019). BN Vitals. Retrieved from Data Dictionary (mcplan.org)

McLean County Regional Planning Commission. (2020). Income-Qualified Housing in McLean County Regional Housing Initiative. Retrieved from https://mcplan.org/file/866/Income%20Qualified%20Housing%20Issue%202A%202020.pdf

McLean County Regional Planning Commission. (2020). Income-Qualified Housing in McLean County. Regional Housing Initiatives. Retrieved from https://mcplan.org/file/866/Income%20Qualified%20Housing%20Issue%202A%202020.pdf

McLean County Regional Planning Commission. (2021). Preservation of LIHTC and other Income-Qualified Housing in McLean County. Retrieved from https://mcplan.org/file/894/Income%20Qualified%20Housing%20Issue%202B.pdf

McLean County Regional Planning Commission. (2021). Regional Housing Initiatives 2020-2021. Retrieved from https://mcplan.org/file/937/Regional%20Housing%20Initiatives%202020-2021%20Report.pdf

McLean County Regional Planning Commission. (n.d.). MCRPC History. Retrieve from https://mcplan.org/about-mcrpc/history

Meléndez, E., Schwartz, A. F., & Montrichard, A. D. (2008). Year 15 and preservation of tax-credit housing for low-income households: An assessment of risk. Housing Studies, 23(1), 67-87.

Meléndez, E., Schwartz, A. F., & Montrichard, A. D. (2008). Year 15 and preservation of tax-credit housing for low-income households: An assessment of risk. Housing Studies, 23(1), 67-87.

Metropolitan Mayors Caucus. (2019). Housing + Community Development Municipal Resource Guide. Retrieved from https://mayorscaucus.org/wp-content/uploads/2013/10/HCD-Municipal-Resource-Guide-2.pdf

Milgram, G. (1993). A Chronology of Housing Legislation and Selected Executive Actions, 1892-1992. Congressional Research Service. Retrieved from https://www.huduser.gov/publications/pdf/HUD-11661.pdf

Minnesota Housing Agency. (2015). Housing Tax Credit Program Qualified Contract Process Guide. Retrieved from https://www.novoco.com/sites/default/files/atoms/files/minnesota_qualified_contract_process_guide_070815.pdf

Mitchell-Weaver, C., Miller, D., & Deal Jr, R. (2000). Multilevel governance and metropolitan regionalism in the USA. Urban Studies, 37(5-6), 851-876.

Moffett, J. (1934). First Annual Report of the Federal Housing Agency. Retrieved from https://www.huduser.gov/portal/sites/default/files/pdf/First-Annual-Report-of-the-Federal-Housing-Administration.pdf

Morrison, P. A. (1974). Urban Growth and Decline in the United States: A Study of Migration's Effects in Two Cities. Paper Series No. 5234

Mullin, J. (2022). Revisiting the Community Reinvestment Act. Federal Reserve Bank of Richmond. Retrieved from https://www.richmondfed.org/publications/research/econ_focus/2022/q1_federal_reserve

Name Redacted. (2014). An Overview of the Section 8 Housing Programs: Housing Choice Vouchers and Project-Based Rental Assistance Every CRS Report. Retrieved from https://www.everycrsreport.com/files/20140207_RL32284_c06c87f7a9b055ade32ee0ca1e2bd69c17c89ecb.pdf

National Archives. (2016). Records of the Housing and Home Finance Agency. National Archives. 2016-08-15. Retrieved from https://www.archives.gov/research/guide-fed-records/groups/207.html#207.1

National Association of Realtors. (2021). NAR Commercial Real Estate Market Report 2021.Q2, Bloomington, IL. Retrieved from https://www.nar.realtor/sites/default/files/documents/2021-q2-commercial-real-estate-metro-market-reports-il-bloomington-08-19-2021.pdf

National Association of Regional Councils. (2021). What is a Regional Council or Council of Governments (COG)? Retrieved from What is a COG or MPO? - National Association of Regional Councils (narc.org)

National Coalition for the Homeless. (2006). NCH Fact Sheet #18: McKinney-Vento Act. Retrieved from https://www.nationalhomeless.org/publications/facts/McKinney.pdf

National Council of State Housing Agencies. (2021). Closing the Qualified Contract Loophole. Retrieved from https://www.ncsha.org/wp-content/uploads/Qualified-Contract-Background.pdf

National Council of State Housing Agencies. (2021). State Housing Finance Agencies: At the Center of the Affordable Housing System. Retrieved from https://www.ncsha.org/resource/hfas-at-the-center/

National Low Income Housing Coalition. (2021). Advocates' Guide to Housing and Community Development. Retrieved from https://nlihc.org/explore-issues/publications-research/advocates-guide

National Low Income Housing Coalition. (2022). State & City Funded Rental Housing Programs. Retrieved from https://reports.nlihc.org/rental-programs/catalog/illinois-affordable-housing-trust-fund#:~:text=The%20Illinois%20Affordable%20Housing%20Trust,family%20developments%20or%20predevelopment%20expenses.

NCLC Digital Library. (n.d.) 1.2.2.2 The Home Owners' Loan Act. Retrieved from https://library.nclc.org/ml/01020202-0

Newman, K. (2009). Post-industrial widgets: Capital flows and the production of the urban. International Journal of Urban and Regional Research, 33(2), 314-331.

Office of Community Planning and Development. (2009). Continuum of Care 101. U.S. Department of Housing and Urban Development. Retrieved from https://files.hudexchange.info/resources/documents/CoC101.pdf

Office of Policy Development and Research. (2012). What happens to low-income housing tax credit properties at year 15 and beyond. U.S. Department of Housing and Urban Development. Retrieved from https://www.huduser.gov/publications/pdf/what_happens_lihtc_v2.pdf

Olberding, J. C. (2002). Does regionalism beget regionalism? The relationship between norms and regional partnerships for economic development. Public Administration Review, 62(4), 480-491.

Opportunity Finance Network. (2021). CDFI Coverage Map. Retrieved from https://ofn.org/cdfi-coverage-map

Opportunity Finance Network. (2021). What is a CDFI. Retrieved from https://ofn.org/what-cdfi#:~:text=Community%20development%20financial%20institutions%20(CDFIs,communities%20join%20the%20economic%20mainstream.

Poulin, S., Metraux, S., Culhane, D. (2008). The History and Future of Homeless Management Information Systems Westport, CTHomelessness in America Vol. 3. Retrieved from https://works.bepress.com/dennis_culhane/101/

Pyati, A. (2016). New CoStar Data Reveal a Vast National Inventory of Naturally Occurring Affordable Housing—and an Untapped Opportunity. Urban Land Institute. Retrieved from https://urbanland.uli.org/economy-markets-trends/new-costar-data-reveal-vast-national-inventory-naturally-occurring-affordable-housing-untapped-opportunity/

Radić, M., Ravasi, D., & Munir, K. (2021). Privatization: implications of a shift from state to private ownership. Journal of Management, 47(6), 1596-1629.

Reyes, S., Wang. R. (2021). Inclusionary Housing: Secrets to Success. Shelterforce. Retrieved from https://shelterforce.org/2021/03/10/inclusionary-housing-secrets-to-success/

Rolfe, S., Garnham, L., Godwin, J. et al. (2020). Housing as a social determinant of health and wellbeing: developing an empirically-informed realist theoretical framework. BMC Public Health 20, 1138 https://doi.org/10.1186/s12889-020-09224-0

Rothstein, R. (2018). The color of law. Liveright Publishing Corporation.

S.566 - 101st Congress (1989-1990): Cranston-Gonzalez National Affordable Housing Act. (1990, November 28). https://www.congress.gov/bill/101st-congress/senate-bill/566

Schaeffer, K. (2022). Key Facts about Housing Affordability in the U.S. Pew Research Center. Retrieved from https://www.pewresearch.org/fact-tank/2022/03/23/key-facts-about-housing-affordability-in-the-u-s/

Schill, M. (1990). Privatizing Federal Low-Income Housing Assistance: The Case of Public Housing, 75 Cornell L. Rev. 877 Available at: http://scholarship.law.cornell.edu/clr/vol75/iss4/3

Shlay, A. B., & Rossi, P. H. (1992). Social Science Research and Contemporary Studies of Homelessness. Annual Review of Sociology, 18, 129–160. http://www.jstor.org/stable/2083449

StateScape. (2022). Budget Timetable. Retrieved from https://www.statescape.com/resources/legislative/budget-timetable/

Susser, I. (1996). The Construction of Poverty and Homelessness in US Cities. Annual Review of Anthropology, 25, 411–435. http://www.jstor.org/stable/2155833

Swanstrom, T. (1999). The nonprofitization of United States housing policy: dilemmas of community development. Community Development Journal, 34(1), 28–37. http://www.jstor.org/stable/44257448

Swanstrom, T. (2001). What we argue about when we argue about regionalism. Journal of urban affairs, 23(5), 479-496.

The City of Bloomington. (2015). Comprehensive Plan 2015-2035; Chapter 4: Neighborhoods. Retrieved from https://www.cityblm.org/home/showpublisheddocument/12054/636229384011800000

The Housing Authority of Bloomington. (2022). Home. Retrieved from http://www.bloomingtonha.com/

The Office of the Comptroller of the Currency. n.d. Community Reinvestment Act. Retrieved from https://www.occ.treas.gov/topics/consumers-and-communities/cra/index-cra.html#:~:text=The%20Community%20Reinvestment%20Act%20of,sound%20operation%20of%20such%20institutions.

Thompson, L. (2006). A History of HUD. Retrieved from https://monarchhousing.org/wp-content/uploads/2007/03/hud-history.pdf

Town of Normal. (2017). Town of Normal Comprehensive Plan. Retrieved from https://mcplan.org/file/226/Elements_Housing.pdf

United States Census Bureau. (2018). 2018: ACE 5-Year Estimates Data Profiles. Retrieved from Census - Table Results

United States Census Bureau. (2021). 2019: ACS 5-Year Estimates Data Profiles. Retrieved from: Census - Table Results

University of Wisconsin Population Health Institute. (2021). Illinois 2021 County Health Rankings & Roadmaps. Retrieved from: McLean County, Illinois | County Health Rankings & Roadmaps

US Department of Agriculture. (2019). COVID-19 Federal Rural Resource Guide. Retrieved from https://www.rd.usda.gov/sites/default/files/usda_covid19_fed_rural_resourceguide508.pdf

US Department of Agriculture. (2022). 'USDA Rural Development. Retrieved from https://www.rd.usda.gov/

US Department of Housing and Urban Development. (2007). Basically CDBG. Retrieved from https://www.hud.gov/sites/documents/DOC_16470.PDF

US Department of Housing and Urban Development. (2012) HUD Historical Background. Retrieved from https://web.archive.org/web/20120823084806/http://www.hud.gov/offices/adm/about/admguide/history.cfm

US Department of Housing and Urban Development. (2014). Major Legislation on Housing and Urban Development Enacted Since 1932. Retrieved from https://www.hud.gov/sites/documents/LEGS_CHRON_JUNE2014.PDF

US Department of Housing and Urban Development. (2014). The eCon Planning Suite: Citizen Participation and Consultation Toolkit. Community Planning and Development. Retrieved from https://www.hudexchange.info/sites/onecpd/assets/File/eCon-Planning-Suite-Citizen-Participation-Toolkit.pdf

US Department of Housing and Urban Development. (2017). Defining Housing Affordability PD&R Edge Online Magazine retrieved from https://www.huduser.gov/portal/pdredge/pdr-edge-featd-article-081417.html

US Department of Housing and Urban Development. (2020). Programs of HUD. Retrieved from https://www.hud.gov/sites/dfiles/Main/documents/HUDPrograms2020.pdf

US Department of Housing and Urban Development. (2021). Budget in Brief Fiscal Year 2022. Retrieved from https://www.hud.gov/sites/dfiles/CFO/documents/2022_Budget_in_Brief_FINAL.pdf

US Department of Housing and Urban Development. (2022). Rental Assistance Demonstration (RAD). Retrieved from https://www.hud.gov/RAD

US Department of Housing and Urban Development. (n.d.) SECTION 202 SUPPORTIVE HOUSING FOR THE ELDERLY PROGRAM. Retrieved from https://www.hud.gov/program_offices/housing/mfh/progdesc/eld202

US Housing and Urban Development. (n.d.) Fair Housing and Related Laws. Retrieved from https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_and_related_law

Vale, L. J., & Freemark, Y. (2019). The privatization of American public housing: Leaving the poorest of the poor behind. The Routledge Handbook of Housing Policy and Planning (pp. 189-206). Routledge.

Wachs, M., & Dill, J. (1999). Regionalism in transportation and air quality: History, interpretation, and insights for regional governance. Governance and opportunity in metropolitan America, 253-280.

Walker, F. Noble, E. (2022). Understanding Who Owns Rental Stock Can Ensure Tenants and Small Landlords Get the Support They Need. Urban Institute. Retrieved from https://www.urban.org/urban-wire/understanding-who-owns-rental-stock-can-ensure-tenants-and-small-landlords-get-support

Weiner, E. (1987). Urban transportation planning since the federal-aid highway act of 1962. Journal of transportation engineering, 113(6), 658-671.

White House. (2022). President Biden Announces New Actions to Ease the Burden of Housing Costs. Briefing Room. Retrieved from https://www.whitehouse.gov/briefing-room/statements-releases/2022/05/16/president-biden-announces-new-actions-to-ease-the-burden-of-housing-costs/

Wolf, M. A. (1990). HUD and Housing in the 1990s: Crises in Affordability and Accountability. Fordham Urb. LJ, 18, 545.

Appendix

Appendix 1

Coefficient of variation of 2020 Contract Rent by census tract in McLean County

Source: U.S. Census Bureau, American Community Survey 2020 Table B25056

Census Tract	Estimate of Units with Cash Rent	Margin of Error with Cash Rent	Coefficient of Variation	Estimate with cash rent: $800 to $899	Margin of Error: $800 to $899	Coefficient of Variation*
1.05	371	92	15%	30	24	49%
1.06	1078	329	19%	56	86	93%
1.07	474	147	19%	0	12	NA**
1.08	1592	446	17%	417	346	50%
1.09	263	101	23%	97	54	34%
2	248	85	21%	5	8	97%
3.01	1083	188	11%	33	34	63%
3.02	998	295	18%	77	75	59%
4	604	140	14%	12	21	106%
5.01	787	170	13%	109	62	35%
5.02	83	37	27%	0	12	NA
5.04	948	183	12%	114	95	51%
5.06	30	31	63%	0	12	NA
5.07	129	62	29%	39	34	53%
11.03	519	153	18%	57	66	70%
11.05	974	181	11%	237	100	26%
11.06	813	144	11%	119	51	26%

Table continued on next page

Census Tract	Estimate of Units with Cash Rent	Margin of Error with Cash Rent	Coefficient of Variation	Estimate with cash rent: $800 to $899	Margin of Error: $800 to $899	Coefficient of Variation
11.07	333	110	20%	0	12	NA
11.08	811	192	14%	104	76	44%
12	581	117	12%	87	63	44%
13.01	297	60	12%	20	17	52%
13.02	377	90	15%	27	24	54%
13.03	334	86	16%	48	36	46%
14.02	337	105	19%	7	12	104%
14.03	455	133	18%	19	22	70%
14.04	239	93	24%	46	47	62%
15	536	163	18%	49	39	48%
16	1177	298	15%	39	34	53%
17	598	113	11%	35	33	57%
18	208	68	20%	0	12	NA
21.01	683	256	23%	23	34	90%
21.02	42	27	39%	8	9	68%
51.02	311	136	27%	0	17	NA
51.03	56	61	66%	0	17	NA
51.04	796	212	16%	144	89	38%
52.01	6	13	132%	0	12	NA
52.02	100	47	29%	0	12	NA
54.01	168	74	27%	22	23	64%
54.02	205	77	23%	20	23	70%
55.01	185	84	28%	0	12	NA
55.02	126	53	26%	0	12	NA
56.01	127	39	19%	4	6	91%
56.02	88	31	21%	2	3	91%
57	406	80	12%	4	6	91%
58	849	207	15%	67	75	68%
59	945	226	15%	60	75	76%
60	264	97	22%	77	60	47%

*Coefficient of variation calculated by generating the standard error (SE), SE = MOE/1.645, then CV = SE/Estimate x 100. When CV is between 15 percent and 30 percent, the estimate is deemed to have medium reliability, and when the CV is over 31 percent, the estimate has low reliability (U.S. Census Case Studies, ACS Data Users Group).

**NA indicates when the estimated number of units is zero and coefficient of variation is thus undefined