June 12, 2020

RE: Recent appropriation of $396 million to IHDA

Director Faust,

Thank you for the opportunity to provide feedback on IHDA’s use of the nearly $400 million appropriated for rent and mortgage relief in the recently passed Illinois budget. Your outreach demonstrates your continued commitment to engage community stakeholders, and we appreciate your partnership.

We strongly support the recommendations submitted to your office by our affordable housing partners, including Shriver Center on Poverty Law, Housing Action Illinois, Chicago Coalition for the Homeless, Access Living, Illinois Housing Council, and Lawyers’ Committee for Better Housing. Their recommendations represent a robust set of suggestions on program design and implementation.

We recognize that although a significant sum of money has been made available to serve the housing needs of Illinois residents, this funding is insufficient to address all housing needs across Illinois - needs which existed before and have only been exacerbated by the economic devastation of COVID-19. Because the need is greater than available resources, it is critical that IHDA takes steps to ensure that this money stretch as far as possible.

To this end, our primary recommendation is to target specific geographies and communities where the need is greatest and the opportunity for assistance will be most deeply felt. In assessing those geographies, we urge you to consider at least the following:

- **Data-informed analysis** considering factors like number of cases, number of deaths, housing cost burden, eviction rates, *households with workers in COVID-impacted industries, economically disinvested and disconnected areas,* and racially or ethnically concentrated areas of poverty. Any data analysis to target relief should use data disaggregated by race to take into account disparities among COVID cases, deaths, and economic impacts.

- **Target relief to residents in most need who are not receiving other federal benefits**, such as mixed status households with undocumented family members who file taxes through ITINs (individual taxpayer identification numbers). In tax credit properties, support should be prioritized for households who are not receiving additional subsidy.
• **Coordinate with state and local programs to enhance community impact.** State and local programs exist that may amplify the effects of IHDA’s investment. For example, the Department of Commerce and Economic Opportunity is currently developing a Business Interruption Grant Program designed to assist communities hardest hit by the pandemic. While IHDA is providing housing assistance, DCEO is providing assistance to businesses. By coordinating closely and from the beginning of program design, IHDA and DCEO can create cumulative community investment impact, providing targeted assistance to communities most in need.

• **Direct funding to communities experiencing multiple, overlapping effects of COVID and recent property damage.** It appears that many of the communities hit hardest by COVID-19 are the same communities hit hardest by property damage in the wake of George Floyd’s death. This is no accident: these are both symptoms of structural racism. IHDA should ensure that these communities - where businesses and residents are most vulnerable - are receiving housing assistance. By doing so, IHDA will ensure those communities’ residents can stay housed and may retain income to spend within their communities on groceries and other necessities.

• **Partner with trusted community based organizations on outreach and education.** Community groups with existing relationships and networks in target communities will be best able to successfully recruit and reach target individuals needing relief assistance. This is especially true for Black, Latinx and other communities of color where a distrust of government may often exist.

• **Use influence to encourage lenders to promote equitable forbearance and repayment plans.** IHDA can optimize mortgage assistance funding by also leveraging its influence to encourage broader and more equitable forbearance and repayment plans. This could be targeted to low- and moderate-income households as well.

We understand that these points are more suggestive than exhaustive. We welcome the opportunity to discuss this matter with you in more detail. Please reach out if we can be of any assistance.

Sincerely,

[Signature]

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