
DATE: Monday, April 13, 2026
TIME: 7:00 PM
PLACE: 400 South Vine Street, Urbana, IL 61801

AGENDA

- A. Call to Order and Roll Call
- B. Approval of Minutes of Previous Meeting
 - 1. 03-09-2026 Council Meeting Minutes
 - 2. 03-16-2026 Committee of the Whole Public Hearing Meeting Minutes
- C. Additions to the Agenda
- D. Presentations and Public Input
- E. Council Input and Communications
- F. Reports of Standing Committees
- G. Committee of the Whole (*Council Member Shirese Hursey, Ward 3*)
 - 1. Consent Agenda
 - a. **Resolution No. 2026-04-013R:** A Resolution Approving the Transfer of Volume Cap in Connection with Private Activity Bonding Authority (Private Bond Cap Allocation – EIEDA, Series 2026) – CD
 - b. **Resolution No. 2026-04-014R:** A Resolution Approving the Transfer of Volume Cap in Connection with Private Activity Bonding Authority (Private Bond Cap Allocation – IHDA, Series 2026) – CD
 - c. **Resolution No. 2026-04-015R:** A Resolution Approving the City of Urbana and Urbana HOME Consortium Annual Action Plan for Fiscal Year 2026-2027 – CD
 - 2. Regular Agenda
- H. Reports of Special Committees
- I. Reports of Officers
 - 1. TACTICS SI Grant Presentation – PD
- J. New Business

All City meetings are broadcast on Urbana Public Television and live-streamed on the web. Details on how to watch are found on the UPTV webpage located at <https://www.urbanail.gov/executive-department/page/urbana-public-television>

K. Discussion

[1.](#) Surveillance Ordinance

L. Adjournment

PUBLIC INPUT

The City of Urbana welcomes Public Input during open meetings of the City Council, the City Council's Committee of the Whole, City Boards and Commissions, and other City-sponsored meetings. Our goal is to foster respect for the meeting process, and respect for all people participating as members of the public body, city staff, and the general public. The City is required to conduct all business during public meetings. The presiding officer is responsible for conducting those meetings in an orderly and efficient manner. Public Input will be taken in the following ways:

Email Input

Public comments must be received prior to the closing of the meeting record (at the time of adjournment unless otherwise noted) at the following: citycouncil@urbanail.gov. The subject line of the email must include the words "PUBLIC INPUT" and the meeting date. Your email will be sent to all City Council members, the Mayor, City Administrator, and City Clerk. Emailed public comments labeled as such will be incorporated into the public meeting record, with personal identifying information redacted. Copies of emails will be posted after the meeting minutes have been approved.

Written Input

Any member of the public may submit their comments addressed to the members of the public body in writing. If a person wishes their written comments to be included in the record of Public Input for the meeting, the writing should so state. Written comments must be received prior to the closing of the meeting record (at the time of adjournment unless otherwise noted).

Verbal Input

Protocol for Public Input is one of respect for the process of addressing the business of the City. Obscene or profane language, or other conduct that threatens to impede the orderly progress of the business conducted at the meeting is unacceptable.

Public comment shall be limited to no more than five (5) minutes per person. The Public Input portion of the meeting shall total no more than two (2) hours, unless otherwise shortened or extended by majority vote of the public body members present. The presiding officer or the city clerk or their designee, shall monitor each speaker's use of time and shall notify the speaker when the allotted time has expired. A person may participate and provide Public Input once during a meeting and may not cede time to another person, or split their time if Public Input is held at two (2) or more different times during a meeting. The presiding officer may give priority to those persons who indicate they wish to speak on an agenda item upon which a vote will be taken.

The presiding officer or public body members shall not enter into a dialogue with citizens. Questions from the public body members shall be for clarification purposes only. Public Input shall not be used as a time for problem solving or reacting to comments made but, rather, for hearing citizens for informational purposes only.

In order to maintain the efficient and orderly conduct and progress of the public meeting, the presiding officer of the meeting shall have the authority to raise a point of order and provide a verbal warning to a speaker who engages in the conduct or behavior proscribed under "Verbal Input". Any member of the public body participating in the meeting may also raise a point of order with the presiding officer and request that they provide a verbal warning to a speaker. If the speaker refuses to cease such conduct or

behavior after being warned by the presiding officer, the presiding officer shall have the authority to mute the speaker's microphone and/or video presence at the meeting. The presiding officer will inform the speaker that they may send the remainder of their remarks via e-mail to the public body for inclusion in the meeting record.

Accommodation

If an accommodation is needed to participate in a City meeting, please contact the City Clerk's Office at least 48 hours in advance so that special arrangements can be made using one of the following methods:

- Phone: 217.384.2366
- Email: CityClerk@urbanil.gov



City of Urbana
 400 S. Vine Street, Urbana, IL 61801
 www.urbanail.gov

MEMORANDUM TO THE MAYOR AND COMMITTEE OF THE WHOLE

Meeting: April 6, 2026, Committee of the Whole
Subject: A Resolution Approving the Transfer of Volume Cap in Connection with Private Activity Bonding Authority (Private Bond Cap Allocation –EIEDA, Series 2026)

Summary

Action Requested

Staff requests that the Committee of the Whole forward the attached Resolution, approving the transfer of half of the City's 2026 Private Activity Bond Cap to the Eastern Illinois Economic Development Authority, to the consent agenda for the April 13, 2026, City Council meeting.

Brief Background

The Committee of the Whole is asked to consider a Resolution regarding allocation of the City's Private Activity Bond Cap before May 1, 2026. In the event the City does not allocate its 2026 Private Activity Bond Cap for specific projects or purposes as of May 1, 2026, the unallocated bond cap will be reserved to the Governor's Office on June 1, 2026 (the "Home Rule Pool").

Two requests were received for the City allocation of Bond Cap: 1) for affordable housing initiatives through the Illinois Housing Development Authority (IHDA), and 2) the Eastern Illinois Economic Development Authority (EIEDA) for developing, constructing, acquiring, or improving affordable housing. There is also the option to provide Bond Cap with some combination of the two. Any unused Bond Cap not ceded for any combination of these programs will automatically be ceded back to the State of Illinois. Community Development Commission has recommended splitting the City of Urbana's 2026 Volume Cap evenly between the two organizations.

Relationship to City Services and Priorities

Impact on Core Services

There will be no impact on the City budget or core services in ceding Bond Cap to EIEDA, as there would be no financial risk associated with issuing the bonds for the City, and any potential associated risk would be assumed by the issuer. The City may also see benefits from eligible local projects in the future if they are supported with the bond financing provided through EIEDA.

Strategic Goals & Plans

Approval of the proposed Resolution is compatible with the findings and strategies described in the City of Urbana and Urbana HOME Consortium FY 2025-2029 Consolidated Plan related to the

affordable housing needs of low- and moderate-income households. Allocating Bond Cap to IHDA and EIEDA would provide a potential funding source for affordable local housing projects.

Previous Council Actions

City Council reviewed and unanimously approved Resolutions 2025-04-021R for 2025 Volume Cap allocation to the Eastern Illinois Economic Development Authority on April 14, 2025.

Discussion

Additional Background Information

A Private Activity Bond is a tax-exempt bond issued by a local or state government for financing a project owned and operated by a private user. Private Activity Bonds are issued to finance various types of facilities, including multi-family housing projects and single-family dwellings. Private Activity Bonds issued by the City are special obligations and do not constitute a debt or indebtedness of the City and do not give rise to a charge against the general credit or taxing power of the City.

In accordance with the IRS Code, each municipality in Illinois is allowed to issue Private Activity Bonds at \$135 per capita population (39,831) for 2026. The State of Illinois outlines the per capita amount and the population size for this calculation in the attached guidelines. The State of Illinois will recapture any bond allocation unused by the City as of May 1 of that year. The City of Urbana has a total of \$5,377,185 in 2026 Private Activity Bond Cap available that may be utilized for:

- 1) Multi-family affordable housing projects
- 2) Nonprofit development projects (e.g., hospitals, YMCAs, etc.)
- 3) Industrial development projects (e.g., manufacturing)
- 4) Below market-rate financing for affordable housing
- 5) Mortgage credit certificates in support of homeownership
- 6) Below-market-rate financing for limited types of industrial developments

EIEDA may issue taxable and tax-exempt bonds for the purpose of developing, constructing, acquiring, or improving affordable housing within the State of Illinois. EIEDA has invested in Housing Authority projects in Champaign County, including the Haven at Market Place. By ceding part of the City's Bond Cap to EIEDA, affordable developments in the City may be able to access these funds.

Recommendation

Staff recommend the Committee of the Whole forward the Resolution to City Council consent agenda, authorizing allocation in the amount of \$2,688,592.50 from the City of Urbana to be utilized by EIEDA for eligible projects including the creation of affordable single-family, multifamily, and senior housing. The City of Urbana Community Development Commission reviewed the Resolution on March 24, 2026, and unanimously voted to forward it to Committee of the Whole with a recommendation of approval.

Attachments

1. EIEDA Resolution

Originated by: Nick Olsen, Interim Grants Division Manager

Reviewed: Olivia Jovine, Community Development Services Director

Approved: Darius White, City Administrator

RESOLUTION NO. _____

**A RESOLUTION APPROVING THE TRANSFER OF VOLUME CAP IN
CONNECTION WITH PRIVATE ACTIVITY BONDING AUTHORITY**

(Private Bond Cap Allocation – EIEDA, Series 2026)

WHEREAS, the City of Urbana (“City”) is a home rule unit of local government pursuant to Article VII, Section 6, of the Illinois Constitution, 1970, and may exercise any power and perform any function pertaining to its government and affairs; and

WHEREAS, Section 146 of the Internal Revenue Code of 1986, as amended (“Code”), provides that the City has volume cap equal to \$135 per resident of the City in calendar year 2026, which volume cap may be allocated to certain tax-exempt private activity bonds; and

WHEREAS, Sections 6 and 6.1 of the Illinois Private Activity Bond Allocation Act (30 ILCS 345/6 and 6.1) authorize the corporate authorities of any home rule unit, before May 1 of each calendar year, to reallocate all or any portion of its unused volume cap to any home rule or non-home rule unit, the State, or a State agency; and

WHEREAS, the Urbana City Council, after due consideration, finds that the City’s best interests are served by the transfer a portion of the City’s volume cap allocation for calendar year 2026 to Eastern Illinois Economic Development Authority (“Issuer”), to be applied toward the issuance of private activity bonds (“Bonds”) by the Issuer for the purpose of supporting eligible projects including the creation of affordable single-family, multifamily, and senior housing, or for such other purpose permitted by this Resolution.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Urbana, Illinois, as follows:

Section 1. Pursuant to Sections 6 and 6.1 of the Illinois Private Activity Bond Allocation Act, the City hereby transfers and reallocates \$2,688,592.50 of its volume cap for calendar year 2026 to the Issuer, which shall issue the Bonds using such transfer of volume cap, without any further action

required on the part of the City. The adoption of this Resolution shall be deemed to be an allocation of such volume cap to the issuance of the Bonds or other private activity bonds.

Section 2. The City and the Issuer shall maintain a written record of this Resolution for the term of all private activity bonds it issues for that calendar year to which such allocation applies.

Section 3. The officers, officials, agents, and employees of the City are hereby authorized, empowered, and directed to perform all acts as may be necessary to carry out the purposes and intent of this Resolution.

Section 4. The invalidity of any section or provision of this Resolution hereby passed and approved shall not invalidate other sections or provisions thereof.

Section 5. All Resolutions or orders, or parts thereof, in conflict herewith are, to the extent of such conflict, hereby superseded. This Resolution shall be in full force and effect from and after its passage.

Section 6. Upon approval of this Resolution, the City Clerk is directed to give notice of the reallocation made herein to the Governor of the State of Illinois pursuant to 30 ILCS 345/6 and the guidelines and procedures promulgated thereunder.

PASSED BY THE CITY COUNCIL this ____ day of April, 2026.

AYES:
NAYS:
ABSTENTIONS:

Darcy E. Sandefur, City Clerk

APPROVED BY THE MAYOR this ____ day of April, 2026.

DeShawn B. Williams, Mayor



City of Urbana
 400 S. Vine Street, Urbana, IL 61801
 www.urbanail.gov

MEMORANDUM TO THE MAYOR AND COMMITTEE OF THE WHOLE

Meeting: April 6, 2026, Committee of the Whole
Subject: A Resolution Approving the Transfer of Volume Cap in Connection with Private Activity Bonding Authority (Private Bond Cap Allocation – IHDA, Series 2026)

Summary

Action Requested

Staff requests that the Committee of the Whole forward the attached Resolution, approving the transfer of half of the City's 2026 Private Activity Bond Cap to the Illinois Housing Development Authority, to the consent agenda for the April 13, 2026, City Council meeting.

Brief Background

The Committee of the Whole is asked to consider a Resolution regarding allocation of the City's Private Activity Bond Cap before May 1, 2026. In the event the City does not allocate its 2026 Private Activity Bond Cap for specific projects or purposes as of May 1, 2026, the unallocated bond cap will be reserved to the Governor's Office on June 1, 2026 (the "Home Rule Pool").

Two requests were received for the City allocation of Bond Cap: 1) for affordable housing initiatives through the Illinois Housing Development Authority (IHDA), and 2) the Eastern Illinois Economic Development Authority (EIEDA) for developing, constructing, acquiring, or improving affordable housing. There is also the option to provide Bond Cap with some combination of the two. Any unused Bond Cap not ceded for any combination of these programs will automatically be ceded back to the State of Illinois. Community Development Commission has recommended splitting the City of Urbana's 2026 Volume Cap evenly between the two organizations.

Relationship to City Services and Priorities

Impact on Core Services

There will be no impact on the City budget or core services in ceding Bond Cap to IHDA, as there would be no financial risk associated with issuing the bonds for the City, and any potential associated risk would be assumed by the issuer. The City may also see benefits from eligible local activities in the future if they are supported with the bond financing provided through IHDA.

Strategic Goals & Plans

Approval of the proposed Resolution is compatible with the findings and strategies described in the City of Urbana and Urbana HOME Consortium FY 2025-2029 Consolidated Plan related to the

affordable housing needs of low- and moderate-income households. Allocating Bond Cap to IHDA would provide a potential funding source for affordable local housing projects and affordable homeownership opportunities.

Previous Council Actions

City Council reviewed and unanimously approved Resolution 2025-04-022R for 2025 Volume Cap allocation to the Illinois Housing Development Authority on April 14, 2025.

Discussion

Additional Background Information

A Private Activity Bond is a tax-exempt bond issued by a local or state government for financing a project owned and operated by a private user. Private Activity Bonds are issued to finance various types of facilities, including multi-family housing projects and single-family dwellings. Private Activity Bonds issued by the City are special obligations and do not constitute a debt or indebtedness of the City and do not give rise to a charge against the general credit or taxing power of the City.

In accordance with the IRS Code, each municipality in Illinois is allowed to issue Private Activity Bonds at \$135 per capita population (39,831) for 2026. The State of Illinois outlines the per capita amount and the population size for this calculation in the attached guidelines. The State of Illinois will recapture any bond allocation unused by the City as of May 1 of that year. The City of Urbana has a total of \$5,377,185 in 2026 Private Activity Bond Cap available that may be utilized for:

- 1) Multi-family affordable housing projects
- 2) Nonprofit development projects (e.g., hospitals, YMCAs, etc.)
- 3) Industrial development projects (e.g., manufacturing)
- 4) Below market-rate financing for affordable housing
- 5) Mortgage credit certificates in support of homeownership
- 6) Below-market-rate financing for limited types of industrial developments

IHDA is allowed to issue taxable and tax-exempt bonds for the purpose of developing, constructing, acquiring, or improving affordable housing within the State of Illinois. IHDA has invested in several projects in the City of Urbana including Crystal View, Highland Green, Steer Place, and Pinewood. IHDA. IHDA also uses Private Activity Bonds to provide mortgage assistance to qualifying households. Between 2015 and 2025, 147 Urbana households received mortgage assistance through IHDA, totaling \$18,334,063.26 in mortgage volume over that period. IHDA partners with local lenders to assist qualifying households through its programs.

Recommendation

Staff recommends the Committee of the Whole forward the Resolution to City Council consent agenda, authorizing allocation of the City of Urbana 2026 Private Activity Bond Cap in the amount of \$2,688,592.50 from the City of Urbana to be utilized by IHDA for eligible projects, including issuance of single-family or multi-family mortgage revenue bonds. The City of Urbana Community

Development Commission reviewed the Resolution on March 24, 2026, and unanimously voted to forward it to Committee of the Whole with a recommendation of approval.

Attachments

- 1. IHDA Resolution
- 2. State of Illinois Guidelines and Procedures for the Allocation of Private Activity Bond Authority 2026

Originated by: Nick Olsen, Interim Grants Division Manager
Reviewed: Olivia Jovine, Community Development Services Director
Approved: Darius White, City Administrator

RESOLUTION NO. _____

A RESOLUTION APPROVING THE TRANSFER OF VOLUME CAP IN CONNECTION WITH PRIVATE ACTIVITY BONDING AUTHORITY

(Private Bond Cap Allocation – IHDA, Series 2026)

WHEREAS, the City of Urbana (“City”) is a home rule unit of local government pursuant to Article VII, Section 6, of the Illinois Constitution, 1970, and may exercise any power and perform any function pertaining to its government and affairs; and

WHEREAS, Section 146 of the Internal Revenue Code of 1986, as amended (“Code”), provides that the City has volume cap equal to \$135 per resident of the City in calendar year 2026, which volume cap may be allocated to certain tax-exempt private activity bonds; and

WHEREAS, Sections 6 and 6.1 of the Illinois Private Activity Bond Allocation Act (30 ILCS 345/6 and 6.1) authorize the corporate authorities of any home rule unit, before May 1 of each calendar year, to reallocate all or any portion of its unused volume cap to any home rule or non-home rule unit, the State, or a State agency; and

WHEREAS, the Urbana City Council, after due consideration, finds that the City’s best interests are served by the transfer a portion of the City’s volume cap allocation for calendar year 2026 to the Illinois Housing Development Authority (“Issuer”), to be applied toward the issuance of single-family or multi-family mortgage revenue bonds (“Bonds”) by the Issuer or for such other purpose permitted by this Resolution.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Urbana, Illinois, as follows:

Section 1. Pursuant to Sections 6 and 6.1 of the Illinois Private Activity Bond Allocation Act, the City hereby transfers and reallocates \$2,688,592.50 of its volume cap for calendar year 2026 to the Issuer, which shall issue the Bonds using such transfer of volume cap, without any further action required on the part of the City. The adoption of this Resolution shall be deemed to be an allocation

of such volume cap to the issuance of the Bonds or other private activity bonds, or mortgage credit certificates.

Section 2. The City and the Issuer shall maintain a written record of this Resolution for the term of all private activity bonds it issues for that calendar year to which such allocation applies.

Section 3. The officers, officials, agents, and employees of the City are hereby authorized, empowered, and directed to perform all acts as may be necessary to carry out the purposes and intent of this Resolution.

Section 4. The invalidity of any section or provision of this Resolution hereby passed and approved shall not invalidate other sections or provisions thereof.

Section 5. All Resolutions or orders, or parts thereof, in conflict herewith are, to the extent of such conflict, hereby superseded. This Resolution shall be in full force and effect from and after its passage.

Section 6. Upon approval of this Resolution, the City Clerk is directed to give notice of the reallocation made herein to the Governor of the State of Illinois pursuant to 30 ILCS 345/6 and the guidelines and procedures promulgated thereunder.

PASSED BY THE CITY COUNCIL this ____day of April 2026.

AYES:
NAYS:
ABSTENTIONS:

Darcy E. Sandefur, City Clerk

APPROVED BY THE MAYOR this ____day of April 2026.

DeShawn B. Williams, Mayor

STATE OF ILLINOIS



GUIDELINES AND PROCEDURES

FOR THE

ALLOCATION OF PRIVATE ACTIVITY BONDING AUTHORITY

IN ACCORDANCE WITH THE TAX REFORM ACT OF 1986

AND THE ILLINOIS PRIVATE ACTIVITY BOND ALLOCATION ACT

OFFICE OF THE GOVERNOR

Effective January 2, 2026

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Questions regarding these guidelines and procedures may be directed to the Capital Markets Unit of the Governor’s Office of Management and Budget at (312) 814-0023. **** Please note that the Hard Copy Submission Address has changed to 555 W. Monroe Street, Suite 1500-S-GOMB, Chicago, IL. 60661**

INTRODUCTION

The Federal Tax Reform Act of 1986 (the “Code”), as amended, imposes a limit on the aggregate amount of “tax exempt private activity” bonds (also known as “Volume Cap”) that can be issued in a state. While the Code provides an allocation scheme for specific issuing authorities, it also provides that a state may, by law, provide a different formula for allocating the State ceiling among the governmental units in the state having authority to issue such bonds. The State of Illinois (“the State”) has enacted procedures for the allocation of Volume Cap pursuant to the Illinois Private Activity Bond Allocation Act, 30 ILCS 345/1 *et seq.* (the “Illinois Allocation Act”).

The Governor’s Office is the entity charged with authority to allocate Volume Cap among the political subdivisions within the State. In the event of conflict between the Code, the Illinois Allocation Act, and these “2026 Guidelines and Procedures” (the “Guidelines”), the Code and the Illinois Allocation Act shall control. Any matters not covered by the Code or the Illinois Allocation Act or the Guidelines shall be decided by the Governor’s Office, and the Governor’s Office reserves the right to amend the Guidelines at any time.

These Guidelines are provided by the Governor’s Office to assist issuers in understanding how the allocation formula will be administered. They do not represent a binding legal interpretation of either the Code or the Illinois Allocation Act. The Governor’s Office will not make a legal determination of the applicability of the Code to an issuer, nor will it determine an issuer’s compliance under the Code. Issuers should consult their own legal counsel to make these determinations.

The Guidelines require certain issuers to submit requests to the Governor’s Office for allocations of Volume Cap. In addition, the Governor’s Office requires issuers within the State to report on reallocations and their use of Volume Cap.

PLEASE NOTE – ALL REQUESTS AND REPORTING SUBMISSIONS, AS DESCRIBED HEREIN, MUST BE SUBMITTED IN BOTH (i) HARD AND (ii) ELECTRONIC FORMATS (ADOBE ACROBAT “PDF”) TO THE FOLLOWING ADDRESSES:

HARD COPY SUBMISSIONS TO:

**Governor’s Office of Management and Budget
Capital Markets Unit – Volume Cap Submission
555 W. Monroe Street – Suite 1500-S-GOMB
Chicago, IL 60661
Attn: Sophia Ronis**

ELECTRONIC (PDF) SUBMISSIONS TO:

OMB.VolumeCapRequest2026@Illinois.gov

Please indicate the (i) name, (ii) status of your organization (Home Rule, Non-Home Rule or State Agency) and (iii) type of submission (either a “REPORT” or a “REQUEST”) in the “SUBJECT” line of your submission e-mail. Please include the following information for a primary and secondary contact person in the body of each electronic submission (email):

Name
Title
Department/Division
Phone Number
Email address

IMPORTANT NOTE – The time and date stamp of the email will be used for the purpose of determining the order in which the submissions are received unless otherwise noted herein.

**** Please note that the Hard Copy Submission Address has changed to 555 W. Monroe Street, Suite 1500-S-GOMB, Chicago, IL. 60661**

Calendar Year 2026 State Ceiling and Allocations

2026 State Ceiling – Background and Calculation

Section 146 of the Code limits the amount of qualified private activity bond debt that may be issued in a state during a calendar year (“the State Ceiling”). Section 146(d) of the Code was amended by H.R. 5662, the “Community Renewal Tax Relief Act of 2000 (the “CRTF Act”),” to specify that beginning in calendar year 2002 the limit shall be the greater of (i) \$75 multiplied by a state’s population or (ii) \$225 million. The CRTF Act further specifies that beginning in calendar year 2003 the volume limit may be adjusted annually for inflation. Pursuant to Revenue Procedure 2008-66 published by the Internal Revenue Service, the volume limit on qualified private activity bonds adjusted for inflation for calendar year 2026 is \$135 multiplied by the state’s population.

Section 146(j) of the Code further requires that the calculation of the State Ceiling be based on the most recent resident population estimate released by the U. S. Bureau of the Census before the beginning of the calendar year. On December 19, 2024, the Population Division of the U.S. Census Bureau issued “Table 1: Annual Estimates of the Population for the United States, Regions, States, and Puerto Rico: April 1, 2000, to July 1, 2024 (NST-EST2024-01)” which reports Illinois’s estimated population as 12,710,158.

Illinois 2026 State Ceiling is \$1,715,871,330.00 (\$135 x 12,710,158).

Allocations

Pursuant to the Illinois Allocation Act, the table below denotes the initial allocation of the 2026 State Ceiling.

Home Rule Units	\$1,107,388,260.00
Non-Home Rule Units	\$ 304,241,535.00
State Agencies/Authorities	\$ 304,241,535.00
Total	\$1,715,871,330.00

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HOME RULE UNITS

Allocation

January 1 Benchmark

As described in “2026 State Ceiling – Background and Calculation” above, each Home Rule community is allocated an amount equal to \$135 multiplied by its population and Cook County, as a Home Rule County, is allocated an amount equal to \$135 multiplied by the population of its unincorporated area. Based on the most recent US Census estimates the total amount for all Home Rule units has been determined to be \$ 1,107,388,260.00. Appendix C identifies the list of Home Rule units and the population count used by the Governor’s Office for the volume cap allocation. Special census estimates or other estimates for individual municipalities are not recognized by the Governor’s Office.

During the period from January 2, 2026, through May 1, 2026, Home Rule units may not apply to the State for an allocation under the Illinois Allocation Act. Rather, Home Rule units must determine and monitor their own private activity bond limits as provided in the Illinois Allocation Act. Please see reporting requirements detailed below in “Home Rule Reporting”.

June 1 Benchmark

The amount of Volume Cap available to each Home Rule unit of government with less than 2,000,000 inhabitants that has not been granted, transferred, or reserved by Home Rule units for specific projects or purposes as of May 1, 2026, shall be reserved to the Governor’s Office for reallocation on June 1, 2026 (the “home Rule Pool”). During the period of June 1 through July 15, 2026, one-half of the home rule Pool will be available to all Home Rule units with less than 2,000,000 inhabitants (the remaining half is available for allocation to the State or State Agencies as herein after described).

The Governor’s Office will accept Home Rule units’ requests for volume cap from the Home Rule Pool beginning on the first State business day on or after June 1, 2026. Requests will be accepted, via the methods described on page 3, only on or after 8:30 a.m., June 1, 2026. No requests can or will be accepted prior to this date and time. **On the first date that applications may be received all applications received between 8:30am and 5pm on such date shall be deemed equally first in line and the Governor’s Office shall grant cap as it may determine. If more than one request is received in a day, other than the first day that applications may be submitted, completed requests will be logged in by the time the electronic submission is received, and processed on a first come, first-granted basis.**

If a determination is made that there is a sufficient amount of allocation remaining in the Home Rule Pool upon a request made, an allocation approval letter will be sent to the applicant. The approval letter will be mailed by first class U.S. Mail to the signatory of the application letter. Express mail will be used upon request and at the issuer’s expense. The allocation is valid until the earlier the end of a period of 60 calendar days from the date of the letter or December 27 of the year of the allocation. This period is set by the Illinois Allocation Act and cannot be extended.

July 15 Benchmark

On and after July 15, 2026, the amount of the unused allocation from the Home Rule Pool shall be available to both Home Rule units of government (with less than 2,000,000 inhabitants) and to State agencies. Requests submitted prior to July 15 that are not completely fulfilled must be re-filed after July 15 if cap is still requested.

The Governor’s Office will accept Home Rule units’ requests for volume cap from the Home Rule pool beginning on the first State business day on or after July 15, 2026. Requests will be accepted, via the methods described on page 3, only on or after 8:30 a.m., July 15, 2026. No requests can or will be accepted prior to this date and time. **On the first date that applications may be received all applications received between 8:30am and 5pm on such date shall be deemed equally first in line and the Governor’s Office shall grant cap as it may determine. If more than one request is received in a day, other than the first day that applications may be submitted, completed requests will be logged in by the time the electronic submission is received, and processed on a first come, first-granted basis.**

Please Note –

- **A completed “Allocation Request Letter” (Appendix A) and a copy of an “official action,” as defined in the Illinois Allocation Act, must accompany all request submissions (June 1 or July 15). A submission will not be deemed complete unless a copy of an official action is included in the transmittal.**
- **No Home Rule unit may be granted more than 10% of the amount of total allocation initially available for Home Rule units for a single project. Home Rule units may submit separate requests for multiple projects. Requests must be for specific projects, not general use. Requests will be processed only for allocation to be used directly by the requesting Home Rule unit. Joint requests from more than one unit or requests from one unit for allocation that will also be used by other units of government will not be considered. Once an allocation is given to a specific unit, the Governor’s Office will not object if units pool their allocations and join together in a bond issue as advised by legal counsel.**
- **The allocation approval letter to Home Rule units of government is valid for a period of 60 calendar days from the date of the letter or through December 27, 2026, whichever date comes first. If an issuer’s allocation has expired, it may apply for a new allocation if allocation is still available. Such application will be processed by the Governor’s Office in the same manner as any other new application.**
- **The State, a State Agency, or Home Rule unit may reallocate all or a portion of its ORIGINAL allocation to a Home Rule Unit, the State, a State Agency, or a Non-Home Rule Unit of local government. Home Rule units may reallocate by official action of their governing body only as to volume cap reserved prior to May 1, 2026. Home Rule units MAY NOT reallocate any allocation granted by the Governor’s Office after June 1. Please see “REALLOCATION PROVISIONS” for further details.**

Home Rule Reporting

Confirmation of Issuance

Pursuant to Section 7 of the Illinois Allocation Act, any Home Rule unit utilizing Volume Cap (regardless of its source) is required to report, within 10 calendar days of issuance, the following:

- (a) Name of the Issuer;
- (b) Principal amount of the issue;
- (c) Purpose for which the private activity bonds were issued;
- (d) The amount, if any, used to refund any prior issue of private activity bond; and
- (e) IRS 8038.

A form of the “Confirmation of Bond Issuance” letter is provided in Appendix A.

If the amount of bonds issued as stated in the confirmation letter is less than the amount approved for allocation for that project, the amount of unused allocation shall be added to the remaining pool allocation available. This “lapsed” volume cap will be offered first to all issuers who have requested volume cap whose requests were not completely fulfilled, in the order that such requests were initially filed. If more than one request was initially filed at the same time, the order of filing will be randomly assigned for purposes of offering lapsed cap. Volume cap is not considered lapsed unless the issuer or issuer’s representative states in writing that all or a portion of the cap will not be used.

Mid-Year Reporting

No later than May 10, 2026, each Home Rule unit with less than 2,000,000 inhabitants must report to the Governor’s Office in writing on volume cap (i) granted, (ii) transferred, or (iii) reserved by official action of the unit’s governing body prior to May 1, 2026. The form described in Appendix A is provided for this purpose – “Report of Allocation Granted by Home Rule”.

Once Volume Cap is properly reserved by a Home Rule unit prior to May 1, 2026, the Governor’s Office will not object to the subsequent transfer or reallocation of such cap or filing of a carry-forward of such volume cap, and no notice to the Governor’s Office of any such subsequent action is required. Please note, however, that Home Rule units must provide notice to the Governor’s Office, as provided in Section 6 of the Illinois Allocation Act, within fourteen days of said reallocation.

Please Note - Copies of “Official Action,” as defined in the Illinois Allocation Act, must accompany this reporting submission. Submission will not be deemed complete unless a copy of Official Action is included with the submissions.

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NON-HOME RULE UNITS

Allocation Requests

January 1 Benchmark

The 2026 allocation of Volume Cap available on or after January 2, 2026, to be issued by Non-Home Rule units of local government is expected to be \$304,241,535.00. Non-Home Rule units are defined as municipalities or counties, other than Home-Rule units. All other forms of government, such as local water districts or airport authorities, must apply for Volume Cap as a State Agency.

The Governor's Office will accept Non-Home Rule units' requests for Volume Cap from the Local Government Pool beginning on the first State business day on or after January 2, 2026 (January 3, 2026). Requests will be accepted, via the methods described on page 3, only on or after 8:30 a.m., January 3, 2026. No requests can or will be accepted prior to this date and time. **On the first date that applications may be received all applications received between 8:30am and 5pm on such date shall be deemed equally first in line and the Governor's Office shall grant cap as it may determine. If more than one request is received in a day, other than the first day that applications may be submitted, completed requests will be logged in by the time the electronic submission received, and processed on a first come, first-granted basis.**

If a determination is made that there is a sufficient amount of allocation remaining in the total available allocation, an allocation approval letter will be sent to the applicant. The approval letter will be mailed by first class U.S. Mail to the signatory of the application letter. Express mail may be used upon request and at the issuer's expense.

July 15 Benchmark

Of the total amount allocated to Non-Home Rule units, the amount of remaining allocation as of July 14, 2026 (the "Non-Home Rule Pool") shall be reserved to the Governor's Office on July 15, 2026, to be allocated to the State, State agencies or Non-Home Rule units as described in the Illinois Allocation Act. Requests submitted prior to July 15 that are not completely fulfilled must be re-filed on or after July 15 if volume cap is still requested.

The Governor's Office will accept Non-Home Rule units' requests for Volume Cap from the Non-Home Rule Pool beginning on the first State business day on or after July 15, 2026. Requests will be accepted, via the methods described on page 3, only on or after 8:30 a.m., July 15, 2026. No requests can or will be accepted prior to this date and time. **On the first date that applications may be received all applications received between 8:30am and 5pm on such date shall be deemed equally first in line and the Governor's Office shall grant cap as it may determine. If more than one request is received in a day, other than the first day that applications may be submitted, completed requests will be logged in by the time the electronic submission is received, and processed on a first come, first-granted basis.**

Please Note –

- A completed "Allocation Request Letter" (Appendix A) and a copy of an "Official Action," as defined in the Illinois Allocation Act, must accompany all request submissions (January 1 or July 15). A submission will not be deemed complete unless a copy of Official Action is included in the transmittal.
- No Non-Home Rule unit may not be granted more than 10% of the amount of total allocation initially available to units of local government for a single project. Non-Home Rule units may submit separate requests for multiple projects. Requests must be for specific projects, not general use. Non-Home Rule units do not have power under statute to transfer or reallocate cap to other Non-Home Rule or Home-Rule units. Requests may be made only for cap that will be used within the Non-Home Rule unit's jurisdiction, as

evidenced by such documentation or evidence as the Governor's Office shall request. Letters of intent from lenders shall be deemed prima facie evidence. Units planning to pool their allocations must certify their intent to comply with this section in their request letter.

- The allocation approval letter is valid for a period of 60 calendar days from the date of the letter. This period is set by the Illinois Allocation Act and cannot be extended.
- Pursuant to Section 6 of Illinois Allocation Act, a Non-Home Rule unit IS NOT AUTHORIZED TO REALLOCATE all or any unused portion of its allocation. Direct and indirect reallocations by Non-Home Rule Units are strictly prohibited. This prohibition is discussed more fully in the "Reallocation Provisions" of these Guidelines.
- The proceeds from bonds utilizing Volume Cap allocated to a Non-Home Rule unit pursuant to these Guidelines must be used within the jurisdiction of the Non-Home Rule unit.

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Non-Home Rule Reporting

Confirmation of Issuance

Pursuant to Section 7 of the Illinois Allocation Act, Non-Home Rule units are required to report, within 10 calendar days of issuance, the following:

- (a) Name of the Issuer;
- (b) Principal amount of the issue;
- (c) Purpose for which the private activity bonds were issued;
- (d) The amount, if any, used to refund any prior issue of private activity bond; and
- (e) IRS 8038.

A form of the “Confirmation of Bond Issuance” letter is provided in Appendix A.

If the amount of bonds issued as stated in the confirmation letter is less than the amount approved for allocation for that project, the amount of unused allocation shall be added to the remaining pool allocation available. This “lapsed” volume cap will be offered first to all issuers who have requested volume cap whose requests were not completely fulfilled, in the order that such requests were initially filed. If more than one request was initially filed at the same time, the order of filing will be randomly assigned for purposes of offering lapsed cap. Volume cap is not considered lapsed unless the issuer or issuer’s representative states in writing that all or a portion of the cap will not be used.

Annual Reporting of Housing Projects

The Illinois Allocation Act requires Non-Home Rule units to provide an annual report of all private activity bonds issued for any housing purposes which utilizes volume cap allocated by the State. Details on the reporting requirement can be located in the Section 7.5 of the Illinois Allocation Act. A form to aid reporting has been provided in Appendix B to these Guidelines. Calendar Year 2026 submissions are to be sent via the instructions set forth on page 3 of these Guidelines by February 1, 2026. An additional copy of this report only must also be submitted to the Illinois Housing Development Authority (“IHDA”) at the following address:

Illinois Housing Development Authority
 Attention: General Counsel
 111 E. Wacker Drive
 Suite 1000
 Chicago, IL 60601

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STATE AGENCIES

Allocation Requests

For calendar year 2026 there is expected to be \$304,241,535.00 for use by State Agencies, (the “State Agency Pool”), defined as any State agency, commission, board, authority, or body politic and corporate of the State authorized by law to issue Private Activity Bonds, other than a Non-Home Rule or Home-Rule unit.

The Governor’s Office may allocate among all State Agencies from the State Allocation Pool available after January 2, 2026. In addition, State Agencies may apply beginning on or after the first State business day after June 1, 2026, for the allocation retained by the Governor’s Office from the Home-Rule Pool and beginning on or after July 15, 2026, for the allocation retained, if any, from the Non-Home Rule Pool. Requests submitted prior to June 1 which are not completely fulfilled, and requests submitted prior to July 15 which are not completely fulfilled must be re-filed after July 15 if cap from the Non-Home Rule pool is requested. Please see “HOME RULE” and “NON-HOME RULE” sections for submission procedures.

Please Note-

- **Requests will be processed only for allocation to be used directly by the requesting State Agency. Requests may be requested and granted on a lump-sum by private activity bond category or individual project basis as the Governor’s Office may determine. Joint requests from more than one State Agency or unit of government or requests from one State Agency for an allocation that will be used by other units of government will not be considered. Once an allocation is given to a specific State Agency, the Governor’s Office will not object if units pool their allocations and join together in a bond issue as advised by legal counsel.**
- **State Agencies may submit requests for allocations of any amount. The 10% limit does not apply to State Agencies**
- **The Governor’s Office may consult with State Agencies prior to submission of their allocation requests and determine the amount of allocation that shall be requested and approved. The allocation shall be valid through the end of the calendar year.**
- **State Agencies may reallocate their unused allocation in the manner described in “REALLOCATION PROVISIONS” with the approval of the Governor’s Office. A State Agency that issues bonds after receiving a reallocation from a Home-Rule unit or another State Agency shall submit the information described in the “Reporting” section below.**
- **State Agencies may also file a carry-forward for an allocation remaining at the end of one calendar year to the next under certain circumstances, with the approval of the Governor’s Office. Issuers should consult their legal counsel with respect to the applicability of this provision to their circumstances.**

State Agency Reporting

Confirmation of Issuance

Pursuant to Section 7 of the Illinois Allocation Act. State Agencies are required to report, within 10 calendar days of issuance, the following:

- (a) Name of the Issuer;
- (b) Principal amount of the issue;
- (c) Purpose for which the private activity bonds were issued;
- (d) The amount, if any, used to refund any prior issue of private activity bond; and
- (e) IRS 8038.

A form of the “Confirmation of Bond Issuance” letter is provided in Appendix A.

If the amount of the bonds issued as stated in the confirmation letter is less than the amount approved for allocation for that project, the unused allocation amount shall be retained by the State Agency unless otherwise directed by the Governor’s Office.

Annual Reporting of Housing Projects

Pursuant to the Illinois Allocation Act, State Agencies are required to provide an annual report of all private activity bonds issued for any housing purposes which utilize volume cap allocated by the State. Details on the reporting requirement can be located in Section 7.5 of the Illinois Allocation Act and a form has been provided in Appendix B for submission. Calendar Year 2026 Submissions are to be sent via the instructions set forth on page 3 of these guidelines by February 1, 2026. An additional copy of this report only must also be submitted to the Illinois Housing Development Authority (“IHDA”) at the following address:

Illinois Housing Development Authority
Attention: General Counsel
111 E. Wacker Drive
Suite 1000
Chicago, IL 60601

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REALLOCATION PROVISIONS

Reallocations by the State, a State Agency, or a Home Rule Unit

The State, any State Agency, or Home Rule unit may voluntarily reallocate to any Non-Home Rule unit of local government, Home-Rule unit, the State, or any State Agency all or any portion of its unused allocation. The State Agency or Home Rule unit reallocating all or a portion of its unused allocation must provide notice to the Governor's office within fourteen days of said reallocation.

Consistent with the Illinois Allocation Act and these Guidelines, entities that issue private activity bonds on the basis of reallocations must submit to the Governor's Office written evidence of such reallocation and a confirmation of bond issuance letter within ten calendar days from the date the bonds are issued.

Reallocations by a Non-Home Rule Unit Are Prohibited.

Non-Home Rule units may not reallocate to any issuer. This prohibition applies to direct reallocations and to reallocations attempted via an intergovernmental or other agreement. Allocations made to Non-Home Rule units pursuant to the Illinois Allocation Act and these Guidelines may not be used in an issuance by another governmental entity on behalf of the Non-Home Rule unit or as a surrogate for the Non-Home Rule unit via an intergovernmental or other agreement.

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STANDARD FORM OF LETTERS

(Letterhead of Signatory)

**ALLOCATION REQUEST LETTER
FROM ALL ISSUERS**

(Date)

Office of the Governor
Governor’s Office of Management and Budget
555 W Monroe Street - Suite 1500 S GOMB
Chicago, IL. 60661

Attn: Sophia Ronis

ATTENTION: Debt Management Unit

RE: Issuer: _____
Type: (Home-Rule, Non-Home Rule or State Agency)
Maximum Principal Amount: _____
Bond Description: (project, beneficiary, location, type/category of bonds)

Dear Governor J B Pritzker:

In accordance with the Tax Reform Act of 1986 as passed by 99th Congress 2nd Session (1986), as amended, and 30 ILCS 345, the (name of issuer) respectfully requests an allocation for the above-captioned private activity bonds. In preparation for this bond issue to date, all applicable Federal and State requirements have been complied with. A copy of the inducement resolution or similar official action for this issue has been attached herewith.

[(The following is required only of Non-Home Rule units which expect to join other units in a single bond issue as described in the guidelines): I hereby certify that (name of issuer) intends to comply with requirements set forth in the Governor's Office guidelines and will not transfer or reallocate any cap received from the Governor's Office to other Non-Home Rule or Home-Rule units and will use the cap only within our jurisdiction.]

I hereby certify, under penalty of perjury, that to the best of my knowledge the issuance of the Private Activity Bond was or will not be made in consideration of any bribe, gift, gratuity or direct or indirect contribution to any political campaign.

Please forward the allocation approval letter to the undersigned [or to: _____]. Bond counsel for these bonds [is expected to be _____, who may be reached at [phone number]] [has not yet been selected].

Sincerely,
(Name of issuer)

(Signature of authorized public official)
(Title)
(Phone number)

[Note: The Bond description cannot be materially changed after submission.]

(Governor’s Letterhead)

BOND ALLOCATION APPROVAL LETTER

(Date)

Allocation Number (our assigned number)

(Name of issuer)

Attention: (Name of Official)

Re: Issuer: _____

Type: (Home-Rule, Non-Home Rule or State Agency)

Maximum Principal Amount: _____

Bond Description: (project, beneficiary, location, type/category of bonds)

Ladies and Gentlemen:

In accordance with the Tax Reform Act of 1986, as amended, and 30 ILCS 345, the above-captioned Issuer has requested an allocation for Private Activity Bonds with respect to the above-captioned bonds. In support of this request, I have been presented with the resolution duly adopted by the Issuer or similar official action with respect to the above-captioned bonds.

I hereby allocate \$_____ of the State’s 2026 maximum limit on private activity bonds to the above-captioned Issuer.

Pursuant to Section 6 of the Illinois Private Activity Bond Allocation Act, this allocation is only valid if:

- (1) the proceeds from the bonds (the “Bonds”) utilizing the bond volume cap are to originate single family mortgages to finance the purchase of homes located within the jurisdiction of the unit local government applying for the bond volume cap, or the costs associated therewith, or, if not so used, applied to redeem the Bonds; and
- (2) the unit of local government is the Issuer of the Bonds.

“Issuer” as used herein is the entity named on the Bonds and obligated for the repayment of the Bonds and does not include an entity for whom bonds have been issued by another party via an intergovernmental or other agreement.

This allocation is valid through and including _____. If the above-captioned bonds have not been issued by said date this allocation automatically expires and is available for reallocation.

Sincerely,
J B PRITZKER

Governor

(Letterhead of Signatory)

**CONFIRMATION OF BOND ISSUANCE
TO BE PROVIDED BY ISSUER**

(Date) [Within 10 calendar days of issuance]

Allocation Number: (assigned by us in the allocation approval letter)

Office of the Governor
Governor’s Office of Management and Budget
555 W Monroe Street - Suite 1500 S GOMB
Chicago, IL. 60661
Attn: Sophia Ronis

ATTENTION: Debt Management Unit

Re: Issuer: _____

Type: (Non-Home-Rule, Home-Rule or State Agency)

Date of Issuance: _____

Principal Amount Issued: _____

Bond Description: (project, beneficiary, location, type/category of bonds)

Dear _____:

In accordance with the Tax Reform Act of 1986, as amended, and the Illinois Private Activity Bond Allocation Act, the above-captioned Issuer is giving notice that the above-captioned private activity bonds have been issued. With regard to the issuance of these bonds, all applicable federal and state requirements have been complied with. The total allocation provided for this bond issue in the Allocation Approval Letter dated _____ was \$_____. The total principal amount actually issued was \$_____ and, therefore, the amount of \$_____ is unused allocation that may be added to the total available allocation.

Sincerely,

(Name of issuer)

(Signature of authorized public official)
(Title)

Attachments

[Note: If the bonds were issued on the basis of a voluntary reallocation of unused allocation or as a result of a carry-forward of allocation from a prior year, this fact should be so stated in this confirmation letter and a copy of the written evidence of such reallocation or carry-forward should be attached.]

(Letterhead of Signatory)

**REPORT OF ALLOCATION GRANTED
BY HOME-RULE UNITS**

(Date) [Due Thursday, May 10, 2026]

Office of the Governor
Governor’s Office of Management and Budget
555 W Monroe Street - Suite 1500 S GOMB
Chicago, IL. 60661
Attn: Sophia Ronis

ATTENTION: Debt Management Unit

Re: Issuer: (Home-Rule unit)
Total 2026 Volume Cap Allocation: [see list attached to guidelines for population, multiplied by \$135.00]

Volume Cap allocations granted, transferred, or reserved by Issuer resolution prior to May 1, 2026:

- 1. Principal Amount of Issue: _____
- Bond Description: (Type of bond)
- (Repeat as necessary identify all specific allocations)
- If reallocated to another issuer, state name of issuer: _____

Copies of allocation resolutions or ordinances are attached. [Note: Memorandums of agreements with businesses need not be attached.]

Total Allocation Granted or Reallocated \$ _____

Sincerely,

(Name of issuer)

(Signature of authorized public official)
(Title)
(Phone number)

APPENDIX B

ANNUAL HOUSING REPORT

SAMPLE FORM

Bond Issuer Annual Reporting Form

Statutory Requirement (30 ILCS 345/7.5)	Explanation/Detail	Insert Required Information
Information Required for All Bond Issues		
Bond Issuer	Entity Issuing Bonds:	
Person Completing Report (Drafter)	Name:	
Drafter Contact Information	Company:	
	Address:	
	Address:	
	City, State, Zip:	
	Phone:	
	E-mail Address:	
Reporting Period	Calendar Year:	
Date of Report	Date (no less than 45 days prior to end of Reporting Period):	
Bond Proceeds Used for Projects and Loans	Percentage of Total Issuance:	
Total Cost of Issuance	Amount:	
Bond Proceeds Used to Refund Prior Bonds	Amount:	
Unused Proceeds at Time of Report	Amount:	
Plan for Use of Any Unused Proceeds	<i>Attach Narrative and Supporting Documentation Showing Commitments to Utilize Proceeds, including timetable for use.</i>	
For Multifamily Rental Units Only		
Total Number of Developments	Total:	
Total Number of Units	Total:	
Income Levels for All Units (using Area Median Income, or "AMI")	No. Units at 30% AMI or less:	
<p><i>NOTE: The table of current AMI figures to be used in compiling this information may be found by calling the Illinois Housing Development Authority at 312-836-5200.</i></p>	No. Units at 40% AMI:	
	No. Units at 50% AMI:	
	No. Units at 60% AMI:	
	No. Units at 80% AMI:	
	No. of Other Restricted Units (% AMI):	
	No. of Other Restricted Units (% AMI):	
	No. of Other Restricted Units (% AMI):	
	Unrestricted (Market Rate):	
Annual Comprehensive Housing Plan Priorities (see below for priority key)	<i>Attach detail showing the number units serving the priority populations described below, along with documentation showing efforts to serve Priority Populations, when available.</i>	
For Single Family Units Only		
Loans and Households Achieving Homeownership with Bond Proceeds	Number of Mortgage Loans:	
	Number of Households:	
Loan Amounts, Actual and Effective Interest Rates	<i>Attach List of Individual Loan Amounts, detailing the actual and effective interest rate for each loan.</i>	
Annual Comprehensive Housing Plan Priorities (see below for priority key)	<i>Attach detail showing the number units serving the priority populations described below, along with documentation showing efforts to serve Priority Populations, when available.</i>	
First-time Homebuyers	Number:	
Homeownership Counseling	No. of assisted homeowners who received any homeownership counseling:	
Key to Priorities		
Disabled - No. Units Serving People with Disabilities (as defined in the Illinois Comprehensive Housing Plan, found at www.ihda.org ; choose "Housing Policy and Planning" in the left margin)		
Extremely Low Income - No. Units Serving Very Low-Income (less than 30% AMI) Households and Families		
Homeless - No. Units Serving Homeless People and Families and Those At-Risk of Homelessness		
Live Near Work - No. Units Serving Low and Moderate-Income Families and People Unable to Find Affordable Housing Near Employment or Transportation		
Preservation - No. of Units for Low-Income Families and People Living in Existing Affordable Housing that is in Danger of Becoming Unaffordable		
Very Low Income - No. Units Serving Very Low-Income (31 to 50% AMI) Households and Families		
QUESTIONS?		
Any questions on how to complete this form should be directed to IHDA's CFO or General Counsel at 312-836-5200 or TTD 312-836-5222.		

APPENDIX C

POPULATION ESTIMATES

Item b.

<u>Home Rule Unit¹</u>	<u>Population²</u>	<u>Home Rule Unit¹</u>	<u>Population²</u>
Addison Village	35,728	East Dundee Village	3,116
Alsip Village	18,486	East Hazel Crest Village	1,254
Alton City	24,967	East St. Louis City	17,808
Arlington Heights Village	75,596	Edwardsville City	26,715
Aurora City	180,710	Elgin City	114,701
Bannockburn Village	1,377	Elk Grove Village Village	31,802
Barrington Hills Village	4,080	Elmhurst City	46,108
Bartlett Village	40,718	Elmwood Park Village	23,698
Bartonville Village	5,836	Elwood Village	2,248
Batavia City	26,555	Evanston City	76,006
Bedford Park Village	585	Evergreen Park Village	19,301
Belleville City	40,560	Fairview Heights City	16,115
Bellwood Village	18,132	Flora City	4,647
Belvidere City	25,325	Forest View Village	765
Benton City	6,578	Freeport City	23,140
Berkeley Village	5,155	Galesburg City	29,289
Berwyn City	55,152	Gilman City	1,674
Bloomington City	79,232	Glencoe Village	8,720
Bolingbrook Village	74,756	Glendale Heights Village	32,866
Bridgeview Village	16,559	Glen Ellyn Village	28,872
Bryant Village	164	Glenview Village	47,634
Buffalo Grove Village	43,072	Glenwood Village	8413
Burbank City	28,606	Golf Village	504
Burnham Village	3,916	Granite City City	26,854
Cahokia Village	17,052	Gurnee Village	30,546
Calumet City City	34,855	Hanover Park Village	36,685
Calumet Park Village	6,777	Harvey City	19,781
Carbon Cliff Village	1,808	Harwood Heights Village	8,755
Carbondale City	22,223	Hazel Crest Village	13,036
Carlock Village	569	Herrin City	12,253
Carol Stream Village	39,556	Highland Park City	30,794
Carpentersville Village	37,144	Highwood City	5,358
Cartersville City	5,821	Hillside Village	8,031
Champaign City	91,961	Hodgkins Village	1,487
Channahon Village	14,392	Hoffman Estates Village	50,920
Chicago City	2,721,308	Homer Glen Village	24852
Chicago Heights City	26,533	Hopkins Park Village	625
Chicago Ridge Village	14,036	Huntley Village	28,495
Christopher City	2,621	Inverness Village	7,428
Cicero town	82,090	Jacksonville City	17,801
Collinsville City	23,766	Johnston City City	3,309
Cook County, Unincorporated	101,455	Joliet City	151,837
Country Club Hills City	16,238	Kankakee City	23,535
Countryside City	6,246	Lake Barrington Village	5,160
Crainville Village	1,493	Lake Bluff Village	5,600
Crystal Lake City	41,513	Lake Forest City	19,642
Danville City	27,981	Lake in the Hills Village	28,706
Darien City	22,015	Lansing Village	28,107
Decatur City	68,763	LaSalle City	9,424
Deerfield Village	19,138	Lincolnshire Village	8,008
DeKalb City	40,491	Lincolnwood Village	13,055
De Pue Village	1,573	Lockport City	26915
Des Plaines City	58,832	McCook Village	241
Dolton Village	20,697	McHenry City	28,825
Downers Grove Village	50,552	Manhattan Village	10,772
Du Quoin City	5,611	Marion City	17,021
		Mascoutah City	9,118

1. Home Rule Communities: Secretary of State – Index Department

2. Population Data Source: Population Division of the U.S. Census Bureau - "Table 1: Annual Estimates of the Population for the United States, Regions, States, and Puerto Rico: April 1, 2020, to July 1, 2024 (NST-EST2024-POP-17) on December 30, 2025

<u>Home Rule Unit¹</u>	<u>Population²</u>	<u>Home Rule Unit¹</u>	<u>Population²</u>
Matteson Village	18,566	Robbins Village	4,567
Maywood Village	23,364	Rockdale Village	1,980
Melrose Park Village	23,999	Rock Island City	36,434
Mettawa Village	562	Rolling Meadows City	23,732
Midlothian Village	13,870	Romeoville Village	41,177
Moline City	42,442	Roselle Village	22,871
Monee Village	5,139	Rosemont Village	3,822
Monmouth City	8,639	Round Lake Beach Village	27,091
Morton Grove Village	24,467	St. Charles City	33,482
Mound City City	481	Sauget Village	134
Mount Prospect Village	55,460	Savoy Village	9,260
Mount Vernon City	14,162	Schaumburg Village	77,099
Muddy Village	57	Schiller Park Village	11,325
Mundelein Village	32,641	Sesser City	1,876
Murphysboro City	7,044	Sherman Village	4,634
Naperville City	153,124	Shorewood Village	18,522
Naples town	97	Skokie Village	65,850
Nauvoo City	910	South Barrington Village	5,061
New Lenox Village	28,480	South Chicago Heights Village	3,887
Niles Village	29,918	South Holland Village	20,775
Normal town	53,304	Springfield City	112,949
Norridge Village	14,817	Standard Village	222
Northbrook Village	34,546	Stickney Village	6,902
North Chicago City	30,639	Stone Park Village	4,473
Northfield Village	5,625	Streamwood Village	38,360
Northlake City	12,433	Summit Village	10,761
North Utica Village	1,343	Sycamore City	18,968
Oakbrook Terrace City	2,729	Thornton Village	2,300
Oak Forest City	26,813	Tilton Village	2,533
Oak Lawn Village	56,531	Tinley Park Village	54,856
Oak Park Village	52,947	Tuscola City	4,658
O'Fallon City	32,169	University Park Village	7,043
Old Mill Creek Village	160	Urbana City	39,831
Onarga Village	1,294	Valier Village	539
Orland Park Village	58,020	Valmeyer Village	1,214
Oswego Village	38,778	Vernon Hills Village	27,002
Palatine Village	65,951	Volo Village	7,361
Park City City	7,940	Warrenville City	15,247
Park Forest Village	21,016	Washington City	15,857
Park Ridge City	38,445	Watseka City	4,495
Pekin City	31,266	Waukegan City	88,570
Peoria City	111,696	West Chicago City	25,469
Peoria Heights Village	5,802	West City Village	640
Peru City	9,793	West Dundee Village	7,906
Phoenix Village	1,650	West Frankfort City	7,131
Plainfield Village	48,881	Wheaton City	53,741
Posen Village	5,413	Wheeling Village	38,329
Prairie Grove Village	1,951	Williamsville Village	1,441
Quincy City	38,786	Willowbrook Village	9,179
Rantoul Village	12,268	Wilmette Village	27,443
Richton Park	12,504	Winnetka Village	12,494
Riverdale Village	10,299	Woodridge Village	34,103
River Grove Village	10,424	Woodstock City	25,892
Riverwoods Village	3,784		

1. Home Rule Communities: Secretary of State – Index Department

2. Population Data Source: Population Division of the U.S. Census Bureau - "Table 1: Annual Estimates of the Population for the United States, Regions, States, and Puerto Rico: April 1, 2020, to July 1, 2024 (NST-EST2024-POP-17) on December 30, 2025



MEMORANDUM TO THE MAYOR AND COMMITTEE OF THE WHOLE

Meeting: April 6, 2026, Committee of the Whole
Subject: A Resolution Approving the City of Urbana and Urbana HOME Consortium Annual Action Plan for Fiscal Year 2026-2027

Summary

Action Requested

The City of Urbana Committee of the Whole is asked to consider the attached resolution approving the 2026/27 City of Urbana and Urbana HOME Consortium Annual Action Plan (AAP).

Brief Background

As a recipient of CDBG and HOME entitlement funding from the U.S. Department of Housing and Urban Development, the City of Urbana and the Urbana HOME Consortium (which consists of the City of Urbana, City of Champaign, and Champaign County) are required to submit an Annual Action Plan. The AAP is a one-year component of the five-year Consolidated Plan, which guides the implementation of CDBG and HOME funded projects.

Relationship to City Services and Priorities

Impact on Core Services

There are considerable impacts on core services associated with the preparation of the Annual Action Plan. The plans guide the utilization of substantial federal resources that support critical affordable housing and community development needs for low-income households throughout the City of Urbana, and the Consortium-wide area.

Strategic Goals & Plans

Approval of the Consolidated Plan and Annual Action Plan further the following Mayor/Council Strategic Goals:

- 2.1.A *Coordinate with housing and social service agencies to reduce homelessness*
- 2.1.B *Continue supporting Tenant-Based Rental Assistance providers through pilot programs that address gaps in service, and by expanding existing programs*
- 2.2.A *Provide targeted assistance for rehabilitation and repairs of dilapidated homes in targeted neighborhoods, with a special emphasis on seniors*
- 2.2.B *Partner with developers to generate affordable rental and homeowner housing*

Funding proposals in the 2026/27 AAP are consistent with the goals, strategies, and objectives of the 2025/29 Consolidated Plan.

Previous Council Actions

Urbana City Council approved the 2025/29 Consolidated Plan and 2025/26 Action Plan on June 9, 2025, in Resolution No. 2025-06-036R.

Discussion

Additional Background Information

The AAP outlines activities that the City and Consortium will undertake during the 2026/27 program year in order to meet the needs and goals outlined in the 2025/29 Consolidated Plan. Every activity funded with CDBG and/or HOME funds in the AAP is consistent with the goals, strategies, and objectives included in the Consolidated Plan.

The AAP is completed electronically and submitted to HUD through the Integrated Disbursement and Information System (IDIS). The beginning of the 2026/27 program year is July 1, 2026. HUD requires submission of the Consolidated Plan and Annual Action Plan no fewer than 45 days prior to the beginning of the program year.

Expected CDBG and HOME allocations can be found on page 17-18 of the AAP. The budget summary is provided in Attachment A of this memo. HUD has not yet determined official allocations for the upcoming program year. As a result, funding estimates are based on prior year numbers. Once final allocations are announced, staff will update the Consolidated Plan and Annual Action Plan proportional to any changes in overall anticipated funding. Per the city's public participation guidelines, additional approval of the adjusted allocations by Council will be required only if the allocations are 25% over or under the estimates.

As part of the public input process for the 2026/27 AAP, Grants Management staff hosted two public hearings, held a 30-day public comment period during which drafts of the plan were available for review, consulted with local service providers, and circulated a community needs survey. A detailed description of the public input process is included in the AAP.

Recommendation

Staff recommends approval of the attached Resolution, noting consistency with the Council goals described above, as well as the goals and budget in the previously approved 2025/29 Consolidated Plan. The City of Urbana Community Development Commission reviewed the Resolution at its March 24, 2026, meeting, and unanimously voted to forward it to Committee of the Whole with a recommendation of approval.

Attachments

1. Summary of Estimated Budget
2. A Resolution Approving the City of Urbana and Urbana HOME Consortium Annual Action Plan for Fiscal Year 2026-2027
3. Draft 2026/27 Annual Action Plan

Originated by: Nick Olsen, Interim Grants Division Manager
Reviewed: Olivia Jovine, Community Development Services Director
Approved: Darius White, City Administrator

Attachment A – Summary of Estimated Budget

FY 2026-2027

CDBG

CDBG Revenue	Amount	Description
Total Estimated FY27 Allocation	\$392,195.00	<i>FY27 allocation</i>
Project	Amount	Description
1. Planning & Administration		
Admin	\$78,000.00	<i>20% cap for staff salaries and planning costs</i>
Category Subtotal:	\$78,000.00	
2. Neighborhood Stabilization		
Property acquisition/demo/new constr.	\$50,000.00	<i>Blight reduction activities in target areas.</i>
Code Enforcement	\$35,000.00	<i>Code enforcement/nuisance abatement in target areas.</i>
Category Subtotal:	\$85,000.00	
3. Housing & Support Services		
Public Services	\$58,000.00	<i>15% cap for public services. Funds expected to support emergency rental assistance in FY27.</i>
Housing Rehabilitation Program	\$128,000.00	<i>Emergency and accessibility rehabilitation grants.</i>
Housing Program Delivery	\$43,195.00	<i>Program delivery costs to administering rehab program.</i>
Category Subtotal:	\$229,195.00	

HOME

HOME Revenue	Amount	Description
Estimated FY27 Allocation	\$633,154.18	
Project	Amount	Description
1. Planning & Administration	\$63,000.18	<i>10% cap for staff salaries and planning costs.</i>
2. CHDO Developer Support	\$150,000	<i>Set aside for CHDO housing development projects.</i>
3. CHDO Capacity Building Support	\$30,000	<i>5% cap for CHDO capacity building</i>
4. TBRA	\$100,000	<i>Tenant-based rental assistance contracts</i>
5. Champaign Affordable Housing Development	\$206,782	<i>Affordable housing development and neighborhood revitalization projects in Champaign.</i>
6. Urbana Affordable Housing Development	\$83,372.00	<i>Affordable housing development and neighborhood revitalization projects in Urbana.</i>

RESOLUTION NO. _____

**A RESOLUTION APPROVING THE CITY OF URBANA AND URBANA HOME
CONSORTIUM ANNUAL ACTION PLAN FOR FISCAL YEAR 2026-2027**

WHEREAS, the City of Urbana has been designated an entitlement city under the Federal Housing and Community Development Act of 1974, as amended, and as such is eligible for Community Development Block Grant (hereinafter "CDBG") funds upon proper submittal being made to the United States Department of Housing and Urban Development (hereinafter "HUD"); and

WHEREAS, the City of Urbana has been designated lead entity for the Urbana HOME Consortium in accordance with the Cranston-Gonzales National Affordable Housing Act of 1990, as amended, and as such is eligible to receive HOME Investment Partnerships (hereinafter "HOME") funds on behalf of the City of Urbana, City of Champaign, and Champaign County; and

WHEREAS, on January 5, 1995, HUD published a final rule in the Federal Register requiring a five-year consolidated plan and annual action plans for all HUD community planning and development formula grant programs, consolidating into a single submission the planning, application, and reporting aspects of the CDBG, HOME, Emergency Shelter Grants, and Housing Opportunities for Persons with AIDS programs, and the Comprehensive Housing Affordability Strategy; and

WHEREAS, public hearings were held to solicit input on the City of Urbana and Urbana HOME Consortium Annual Action Plan for Fiscal Year 2026-2027 (hereinafter the "Annual Action Plan"); and

WHEREAS, the Urbana Grants Division staff, assisted by the Urbana Community Development Commission, has prepared the Annual Action Plan for public review; and

WHEREAS, said Annual Action Plan was placed on file for public review beginning February 20, 2026, and ending March 23, 2026; and

WHEREAS, the Urbana Community Development Commission public hearings on September 23, 2025 and February 20, 2026 to receive comments on the Annual Action Plan;

NOW, THEREFORE, BE IT RESOLVED By the City Council of the City of Urbana, Illinois, as follows:

Section 1.

That the City of Urbana and Urbana HOME Consortium Annual Action Plan for Fiscal Year 2026-2027, in substantially the form as attached hereto, is hereby approved.

Section 2.

That the Mayor is hereby designated as the authorized representative of the City of Urbana to take any action necessary in connection with said Annual Action Plan to implement the CDBG and HOME programs and to provide such additional information as may be required.

PASSED BY THE CITY COUNCIL this _____ day of April, 2026.

AYES:

NAYS:

ABSTENTIONS:

Darcy E Sandefur, City Clerk

APPROVED BY THE MAYOR this _____ of April, 2026.

DeShawn Williams, Mayor

DRAFT

City of Urbana &
Urbana HOME
Consortium

Annual
Action Plan
FY
2026/27

July 1, 2026 – June 30, 2027



Prepared by:
City of Urbana
Community Development Services | Grants Division
400 South Vine Street
Urbana, Illinois 61801

DRAFT



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Executive Summary

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

1. Introduction

Contingency Language: Actual allocations by the U.S. Department of Housing and Urban Development are not yet known for the 2026-27 Action Plan period at the time of publication of this draft. Budgets included in this plan are estimates based on prior year allocations and will be adjusted up or down proportionally in the final draft when actual allocations are known. Adjustments to CDBG and HOME funds will be proportionally distributed among all CDBG and/or HOME Activities/Projects.

The City of Urbana and Urbana HOME Consortium Consolidated Plan identifies and prioritizes housing, community development, and economic needs of low- and moderate-income households in Urbana, and across Champaign County. The Action Plan serves as a one-year guide to how the City of Urbana and Consortium members will utilize funding from the U.S. Department of Housing and Urban Development (HUD) to address these critical needs, within the five-year Consolidated Plan period (2025 – 2029). This action plan covers the July 1, 2026—June 30, 2027 program year, the second year of the 2025-2029 period.

Every year of the five-year Consolidated Plan period, the City of Urbana will receive an allocation of Community Development Block Grant (CDBG) funds from HUD. The City of Urbana, acting as the lead entity of the Urbana HOME Consortium, will also receive an annual allocation of HOME Investment Partnership (HOME) funds from HUD. The Consortium consists of the City of Urbana, City of Champaign, and unincorporated Champaign County represented by the Champaign County Regional Planning Commission.

The Consolidated Plan and corresponding Action Plans are collaborative documents, the foundation of which is community input and engagement. Throughout the planning process, staff have consulted extensively with residents, social service organizations, and other important stakeholders to craft the goals and priorities addressed in the Plan. The City of Urbana is committed to fostering a diverse and inclusive community that engages and encourages residents and institutions to work together to make Urbana a healthy, safe, and thriving community.

Many organizations in Champaign County undertake regular planning initiatives to address low-and moderate-income housing and community development needs. The Consolidated Plan incorporates these local planning initiatives to ensure efforts and resources are strategically aligned. The City of Urbana and its consortium members would like to thank the many housing and social service provider agencies that have partnered in this important work.

The city of Urbana agrees that its compliance in all respects with all applicable Federal anti-discrimination laws is material to the U.S. Government's payment decisions for purposes of section 3729(b)(4) of title 31, United States Code. The city of Urbana will not operate any programs that violate any applicable Federal anti-discrimination laws, including Title VI of the Civil Rights Act of 1964.

2. Summarize the objectives and outcomes identified in the Plan

The statutory goals of the CDBG and HOME programs are to provide decent housing, sustain a suitable living environment, and expand economic opportunities, principally for low- and moderate- income persons. During the FY 2026-27 period, the City and Consortium will continue to further the 2025-29 Consolidated Plan goals through the following:

- Increase the supply of high-quality affordable housing
- Retain existing affordable housing stock
- Assist individuals experiencing or at-risk of homelessness to find and maintain housing
- Improve safety and livability of neighborhoods
- Affirmatively further fair housing
- Increase access to high-quality public and private facilities and service

3. Evaluation of past performance

Each year, the City of Urbana evaluates and reports on the progress made toward the goals outlined in the Consolidated Plan, and one-year Annual Action Plan. This is accomplished through completion of the Consolidated Annual Performance Evaluation Report (CAPER). The CAPER is submitted to HUD each year for review and approval. The CAPER is made available for public review at the City of Urbana Community Development Services Department, and on the City's website.

The most recently completed CAPER was for the FY 24-25 period, the final year of the previous 2020-2024 Consolidated Plan Period. During FY 24-25, met, exceeded, or made significant progress toward goals related to housing rehabilitation, public infrastructure development, homeowner housing construction, and rental assistance were met or exceeded. During FY24-25, progress was not made toward goals related to property demolition and new rental construction. The Consortium has funds actively committed to in-progress rental developments and expects to report accomplishments as projects are completed. Grants staff will continue to coordinate with the City Building Safety Division to identify projects in target areas eligible for demolition, and where properties may be donated for affordable housing development.

4. Summary of Citizen Participation Process and consultation process

The Consolidated Plan was developed by the City of Urbana Grants Division staff in collaboration with the Champaign Neighborhood Programs Division Staff from both cities have contributed input and data to the Plan and have coordinated to conduct community-wide public engagement.

5. Summary of public comments

High priorities identified through surveys include affordable housing, rental assistance, homeless shelter/services, domestic violence services, senior housing, pedestrian infrastructure, and mental health resources.

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

There were no comments that were not accepted.

7. Summary

The Annual Action Plan reflects the coordinated efforts of the Urbana HOME Consortium and its citizens, as well as the expansive network of housing and human service providers in Champaign County. Through strategies documented in this plan, the effectiveness and impact of federal funds will be maximized through thoughtful investment of resources, reduced duplication of services, and improved service delivery. The goals and objectives identified in this plan aim to improve the quality of life in Champaign County, particularly for low-income, homeless, elderly, and/or special-needs individuals and families.

PR-05 Lead & Responsible Agencies - 91.200(b)

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

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

Agency Role		Name	Department/Agency
CDBG Administrator	URBANA		Community Development/Grants Management Division
HOME Administrator	URBANA		Community Development/Grants Management Division

Table 1 – Responsible Agencies

Narrative

The City of Urbana is the lead agency for the Urbana HOME Consortium and is responsible for the administration of the HOME program. The Consortium members meet on a regular basis to discuss community challenges as well as programs being implemented with the HOME funds. Urbana staff monitor program compliance and subrecipient agreements for projects that take place within the City of Urbana and unincorporated Champaign County, and Champaign staff monitor program compliance and subrecipient agreements for projects that take place within the City of Champaign.

Both cities, the county, and Housing Authority of Champaign County have worked for many years to address housing and community development needs in the County. Staff from all three are actively engaged with other community agencies to address community housing and service needs. All activities and actions undertaken by the City and Consortium will not violate any applicable Federal anti-discrimination laws, including Title VI of the Civil Rights Act of 1964.

Consolidated Plan Public Contact Information

City of Urbana
Community Development Services Department

Annual Action Plan
2024

5

Grants Division
400 South Vine Street
Urbana, IL 61801
Grants@UrbanaIL.gov

AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

The Action Plan is developed by City of Urbana Grants Division staff in collaboration with staff from the City of Champaign Neighborhood Programs Division. Staff from both cities have contributed input and data to the Plan and have coordinated to conducted community-wide public engagement.

Information about the Action Plan and how community members can participate in the planning process is disseminated through the following channels:

- Social media
- Newspaper notices
- Public Hearings
- Community Needs Survey
- Community meetings & events

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).

Several public and assisted housing providers have been consulted in the above-mentioned stakeholder engagement process, including through the Housing Authority of Champaign County and local Continuum of Care. Furthermore, the community needs survey distributed to community partners contains a section specifically for mental health and service provider agencies to share their input on current gaps in service and ways that coordination can be enhanced county-wide.

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

The City of Urbana and Urbana HOME Consortium coordinate closely with the Champaign County Continuum of Service Providers to the Homeless (CSPH), which is the Continuum of Care covering Champaign County. Staff from both cities have served on the CSPH Executive Committee, or as past Executive Committee Chairs. In 2023, Urbana staff on the Executive Committee assisted with the development of the Continuum’s 3-year strategic plan, which is ongoing at this time.

Draft HUD Plans are presented to the CSPH for review and comment during public comment periods. Community needs surveys are shared with CSPH members.

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

Consortium staff regularly serve on the Continuum’s Rating and Ranking and Executive Committees, which are responsible for allocating ESG funds annually. Furthermore, as members of the Executive Committee, Consortium staff have had opportunities to develop and evaluate outcomes and develop funding, policies, and procedures for managing HMIS.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization Name	City of Champaign
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Champaign, as an Urbana HOME Consortium member, has gathered substantial public input regarding consortia-wide projects, and is consulted regularly regarding Consortium planning and funding decisions. The City of Champaign is currently finalizing a housing

		study that will help inform Consortium planning moving forward.
2	Agency/Group/Organization Name	Champaign County Regional Planning Commission
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Employment Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Champaign County Regional Planning Commission is a member of the Urbana HOME Consortium and administers services and programs that provide assistance to low-income residents, as well as individuals and families experiencing homelessness. CCRPC gathers substantial data on local conditions, and this information is a vital component to the Consortium’s planning efforts.
3	Agency/Group/Organization Name	IL-503 CoC Champaign County (Continuum of Service Providers to the Homeless)
	Agency/Group/Organization Type	Planning organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Over 40 homeless service provider agencies, including municipal and nonprofit partners are members of the IL-503 Continuum of Care. The Urbana HOME Consortium members have all served on the Executive Committee or as past chairs for the CoC, and the three participating jurisdictions/subrecipients to the HOME Consortium continue to be active on the Continuum of Service Providers to the Homeless. During the annual March meeting, the Urbana HOME Consortium will solicit input on the Annual Action Plan from the group. The Community Needs Assessment Survey was sent out to the CoC and members were encouraged to participate.
4	Agency/Group/Organization Name	Champaign County Human Services Council
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Human Services Council is made up of local healthcare and behavioral healthcare providers, municipalities, and non-profits organizations that meet monthly to discuss issues facing low-mod residents of Champaign County. The Community Needs Assessment Survey was sent out to the group and members were encouraged to participate.
5	Agency/Group/Organization Name	Community Reinvestment Group
	Agency/Group/Organization Type	Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Community Reinvestment Group is made up of local Community Reinvestment Act bankers, non-profit housing providers, municipalities, and the Housing

		Authority of Champaign County. The group meets monthly to discuss affordable housing and lending issues facing low-mod residents of Champaign County. At its Spring 2026 meeting, Consortium members will provide a presentation on the Annual Action Plan and solicit feedback on affordable housing needs from the group.
6	Agency/Group/Organization	Housing Authority of Champaign County
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Urbana HOME Consortium regularly meet with the Housing Authority of Champaign County to review data and discuss the needs in Champaign County. The Housing Authority continues to inform local jurisdictions of major housing opportunities and is currently collaborating on major redevelopments in Champaign (Bristol Place Senior Residences) and Urbana (Lierman/Washington).

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

Not applicable

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	CCRPC	The Champaign County Continuum of Care has goals identified for optimizing housing choices for persons either homeless or at risk of homelessness. These areas align with the Urbana HOME Consortium's goal of ensuring access to decent, safe and sanitary housing for all residents.

Table 3 – Other local / regional / federal planning efforts

Narrative

N/A

AP-12 Participation - 91.401, 91.105, 91.200(c)

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

A draft of the FY 26-27 Annual Action Plan was available to the public during the public comment period, from February 20, 2026, to March 23, 2026. Copies were made available at the Urbana City Building, the Urbana Free Library, and the City's website. Information about public hearings is posted on the City of Urbana's website, and the city's calendar for public review. Information was shared through local service provider networks. Public hearings were held in Urbana City Hall on Tuesday, September 23, 2025 and February 24, 2026. During the comment period, a community needs survey was circulated through flyering, social media, service provider consultations, and public meetings.

Staff continue to utilize Community input data generated during the 2025-2029 Consolidated Plan process, which included over 20 in-person engagement events, 177 survey responses, and consultation with a wide range of service providers. A full summary of this input is included in the 2025-2029 Consolidated Plan.

Information received through this consultation process reflects a strong public mandate for investment in behavioral health services, homelessness response, affordable housing development, and social services—particularly for families with children, survivors of domestic violence, and individuals with disabilities.

Community feedback informed the Consortium’s goal setting across several domains. In the area of homelessness, respondents emphasized the need for transitional housing, emergency shelters, and wraparound supportive services. Housing-related comments called for investment in rehabilitation for owner-occupied homes, rental assistance, and housing targeted to those experiencing homelessness or reentering the community after incarceration. Public services such as youth and senior programming, mental health support, disability services, and crime prevention were also identified as key community priorities. Infrastructure needs were also frequently noted.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non-targeted/broad community	Public hearing and comment period information was published in the News-Gazette to weeks ahead of public hearings on September 10, 2025, and February 11, 2025.	No public comments received at this hearing.	N/A	
2	Public Hearing	Non-targeted/broad community	The Urbana Community Development Commission hosted a presentation and public hearing on September 23, 2025 and February 24, 2026	No public comments received at this hearing.	N/A	https://www.youtube.com/watch?v=ZWt8Mjsk4To&t=2925s

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Event	Homeless service providers	At its March 10, 2026 meeting, the Champaign County Continuum of Service Providers of the Homeless (CSPH) received a presentation on the draft Consolidated Plan and public comment opportunities.	Survey was shared with service providers. 6 service provider surveys were completed. High priorities identified include affordable housing, rental assistance, and homeless shelter and services.	N/A	
4	Event	Lenders and housing providers	At its Spring 2026 meeting, the Community Reinvestment Group will receive a presentation on the draft plan.	Discussion of lending products in relation to CPD programs.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Internet Outreach	Non-targeted/broad community	A community input survey was available online during the public comment period. The survey was shared on through social media, during meetings with service provider, and in-person through fliers. 31 residents and 6 service providers took the survey.	High priorities identified through surveys include affordable housing, rental assistance, homeless services, domestic violence services, pedestrian infrastructure, senior housing, and mental health resources.	N/A	https://forms.gle/WfjjB1FFHwFm6siG8

Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

In year two of the 5-year Consolidated Plan period (FY27), the City of Urbana expects to receive an estimated CDBG allocation of \$392,195. In FY27, the Urbana HOME Consortium expects receive an estimated HOME allocation of \$633,154. Contingency Language: Actual allocations by the U.S. Department of Housing and Urban Development are not yet known for the 2026-27 Action Plan period at the time of publication of this draft. Budgets included in this plan are estimates based on prior year allocations and will be adjusted up or down proportionally in the final draft when actual allocations are known. Adjustments to CDBG and HOME funds will be proportionally distributed among all CDBG and/or HOME Activities/Projects.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	392,195.00	0.00	0.00	392,195.00	1,176,585.00	CDBG funds will be used for eligible costs including acq/demo/new construction, public facility improvements, public services including rental assistance, TBRA program delivery, certain economic development activities, admin & planning, code enforcement, housing rehab activities, and project delivery.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	633,154.18	0.00	0.00	633,154.18	1,899,462.54	HOME funds will be used consortium-wide for eligible costs including development/rehab of affordable housing, TBRA, CHDO project and operating, and planning & admin costs.

Table - Expected Resources – Priority Table

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

All Consortium members continue to seek private investment, tax credits, and grant opportunities from the State of Illinois that further the goals outlined in the Consolidated Plan. The Cities of Champaign and Urbana continue to work with private developers applying for tax credit incentives on future developments. The City of Urbana is working with the local developers to build affordable housing on what is currently city-owned property on Lierman and Washington Avenues. The City of Urbana is also continuing to collaborate with non-profit stakeholders and healthcare providers in the community to develop a tiny homes facility that will support medically fragile individuals who are experiencing homelessness. Champaign has invested a portion of its HOME funds in Bristol Place Senior Residences, which broke ground in December 2024,

and Phase II of Parker Glen, which broke ground in Spring of 2025 and are still under construction.

The 25% match requirement for the HOME program utilizes a variety of leveraging sources to fulfill this obligation. The City of Urbana and Champaign contribute cash matches towards its HOME projects from private investment in development projects. Land donations for developments will contribute to the program in the coming year, as well as volunteer hours and cash contributions provided by the volunteers of Habitat for Humanity of Champaign County, a certified CHDO. The Consortium has a large carryover match balance that will exceed the anticipated match requirement in the coming years.

CDBG funded City of Urbana projects for public facility and infrastructure leverage general funds and State of Illinois Motor Fuel Tax dollars to have a greater impact on the projects. The City of Urbana has also leveraged funds through the State of Illinois Department of Commerce and Economic Opportunity to support public service programming and capital improvement projects. Public service spending is supplemented by City of Urbana general funds. An estimated \$300,000 in general funds will be committed annually to support public services for low-income Urbana households. This practice is expected to continue through the 2025-2029 Consolidated Plan period.

The City of Urbana agrees that its compliance in all respects with all applicable Federal anti-discrimination laws is material to the U.S. Government’s payment decisions for purposes of section 3729(b)(4) of title 31, United States Code. The city of Urbana will not operate any programs that violate any applicable Federal anti-discrimination laws, including Title VI of the Civil Rights Act of 1964.”

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

City Code Enforcement staff will continue to identify blighted properties that may be purchased with CDBG funds, demolished, and then donated to a not-for-profit developer or CHDO. These lots will be used to address affordable housing needs identified in the Consolidated Plan. The city does not keep an inventory of land.

Discussion

N/A

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Invest in Affordable Housing	2025	2029	Affordable Housing	Urbana Consortium-wide Area	Affordable Housing	CDBG: \$85,000.00 HOME: \$470,154.00	Rental units constructed: 3 Household Housing Unit Homeowner Housing Added: 4 Household Housing Unit Buildings Demolished: 1 Buildings Housing Code Enforcement/Foreclosed Property Care: 400 Household Housing Unit
2	Support Households in Need	2025	2029	Affordable Housing Homeless Non-Homeless Special Needs	Urbana Consortium-wide Area	Community Services	CDBG: \$229,195.00 HOME: \$100,000.00	Public service activities other than Low/Moderate Income Housing Benefit: 12 Persons Assisted Homeowner Housing Rehabilitated: 10 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
								Tenant-based rental assistance / Rapid Rehousing: 12 Households Assisted
3	Planning and Administration	2025	2029	Other	Urbana Consortium-wide Area	Affordable Housing Community Services Community Development	CDBG: \$78,000.00 HOME: \$63,000.18	Other: 2 Other

Table 2 – Goals Summary

Goal Descriptions

<p>1</p>	<p>Goal Name</p>	<p>Invest in Affordable Housing</p>
	<p>Goal Description</p>	<p>In order to encourage investments in the expansion and preservation of high-quality affordable housing, and to ensure everyone in the Consortium-wide area has a safe and affordable place to live, the City of Urbana and Urbana HOME Consortium will support a variety of housing activities including new housing construction for both renter and homeowner households, acquisition/demolition, and code enforcement in targeted areas.</p> <p>CDBG Neighborhood Stabilization</p> <p>Acquisition/Demolition/New Construction: The City of Urbana will provide funding for the acquisition and demolition of abandoned or sub-standard properties in the City. Once cleared, the properties will be donated to affordable housing developers, or CHDOs for the development of affordable housing. An estimated 1 blighted structure will be acquired and demolished during the 1-year Annual Action Plan period.</p> <p>Code Enforcement: In order to preserve high-quality affordable housing, the City of Urbana will support code enforcement activities in low-income targeted areas. An estimated 400 households will be served in one year.</p> <p>CHDO Developer Support</p> <p>The Urbana HOME Consortium will partner with certified CHDOs to develop affordable housing for homeownership and rental. An estimated 5 units will be produced during the 1-year Annual Action Plan period.</p> <p>CHDO Operating Support</p> <p>The Urbana HOME Consortium will provide capacity building support to certified CHDOs in order to support the development of affordable rental and homeowner housing.</p> <p>Champaign Affordable Housing Development</p> <p>Champaign HOME funds will be used to develop affordable rental housing in the City of Champaign. An estimated 2 units will be created in the 1-year Annual Action Plan period.</p> <p>Urbana Affordable Housing Development</p> <p>Urbana HOME funds will be used to develop affordable rental housing in the City of Urbana. An estimated 1 unit will be created in the 1-year Annual Action Plan period.</p>

2	Goal Name	Support Households in Need
	Goal Description	<p>Through the use of CDBG and HOME funds, the Urbana HOME Consortium will support low-income households through the provision of critical services.</p> <p>CDBG Housing & Support Services</p> <p>CDBG Public Services: Over the course of the 1-year Annual Action Plan period, the City of Urbana will commit its 15% public service cap to projects and programs that support low- income Urbana residents. Activities may include homelessness prevention rental assistance, and other public services for low-income households, and households experiencing or at risk of experiencing homelessness.</p> <p>Housing Rehabilitation: The City of Urbana will continue to provide rehabilitation assistance to low-income homeowners in Urbana. Assistance may include grants for emergency repairs, roof repair and replacement, and accessibility modifications for individuals with a disability and Seniors. An estimated 20 households will be served in the 1-year Annual Action Plan period.</p> <p>Housing Rehabilitation Program Delivery: The City of Urbana will use CDBG to pay program delivery costs associated with operating the Housing Rehabilitation Program. Costs will include staff salaries and wages.</p> <p>Tenant-based rental assistance (TBRA)</p> <p>The Urbana HOME Consortium will provide HOME funds to local housing service providers to support TBRA programs for low-income households. An estimated 12 households will receive TBRA assistance in the 1-year Annual Action Plan period.</p>
3	Goal Name	Planning and Administration
	Goal Description	Planning and administration of the CDBG and HOME programs.

AP-35 Projects - 91.420, 91.220(d)

Introduction

The City of Urbana and Urbana HOME Consortium made its funding allocation decisions based on public input received during the Consolidated Plan and Annual Action Plan process, with input and oversight provided by the City’s Community Development Commission. Funding is awarded based on eligible activities and priorities identified in the application. The following is a list of proposed projects for the one-year Annual Action Plan period. All of the proposed projects are tied back to the Goals identified in the SP-45.

Consideration has also been given to program delivery and staffing requirements to successfully operate the grant activities, various objectives of leveraged funding available, as well as programmatic constraints of both the HOME Investment Partnerships and Community Development Block Grant programs. The projected target start date for the proposed programs is July 1, 2026, and the projected commencement of proposed programs is June 30, 2027.

Total CDBG funds committed to projects in 2026-2027 Annual Action Plan period: **\$392,195.00**

Total HOME funds committed to projects in 2025-2026 Annual Action Plan period: **\$633,154**

The city of Urbana agrees that its compliance in all respects with all applicable Federal anti-discrimination laws is material to the U.S. Government’s payment decisions for purposes of section 3729(b)(4) of title 31, United States Code. The city of Urbana will not operate any programs that violate any applicable Federal anti-discrimination laws, including Title VI of the Civil Rights Act of 1964.

#	Project Name
1	CDBG Planning & Administration
2	CDBG Neighborhood Stabilization
3	CDBG Housing & Support Services
4	CDBG Neighborhood Revitalization
5	HOME Planning and Administration
6	CHDO Developer Support
7	CHDO Operating Support
8	TBRA
9	Champaign Affordable Housing Development
10	Urbana Affordable Housing Development

Table 3 – Project Information

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

needs

Allocation priorities are based on the statutory requirements of the HOME Investment Partnership program, Community Development Block Grant programs. Needs have been prioritized in keeping with identified needs in the Consolidated Plan and corresponding community input.

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG Planning & Administration
	Target Area	Urbana Community Development Target Area
	Goals Supported	Planning and Administration
	Needs Addressed	Affordable Housing Community Services Community Development
	Funding	CDBG: \$78,000.00
	Description	Planning and Administration to support the CDBG funded activities.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	CDBG planning & admin activities.
2	Project Name	CDBG Neighborhood Stabilization
	Target Area	Urbana Community Development Target Area
	Goals Supported	Invest in Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$85,000.00
	Description	The City of Urbana will undertake activities to stabilize neighborhoods in order to preserve existing affordable housing and make Urbana a strong and healthy place to live. Activities will include acq/demo/new construction, and code enforcement in targeted areas.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 400 low-income households will benefit from code enforcement activities, and an estimated 1 blighted property will be demolished.
	Location Description	The Urbana Community Development Target Areas consist of census blocks with 51% or more low- to -moderate income households.

	Planned Activities	Acquisition and demolition of abandoned or sub-standard housing Code enforcement in targeted neighborhoods
3	Project Name	CDBG Housing & Support Services
	Target Area	Urbana Community Development Target Area
	Goals Supported	Support Households in Need
	Needs Addressed	Community Services
	Funding	CDBG: \$229,195.00
	Description	The City of Urbana will provide CDBG funding to support programs and services for low-income households. This will include utilization of the City's 15% CDBG public service allocation for services to low-income residents, including rental assistance for individuals or households experiencing homelessness.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	An estimate 32 low-income households will benefit from the proposed activities.
	Location Description	The Urbana Community Development Target Areas consist of census blocks with 51% or more low- to -moderate income households.
	Planned Activities	CDBG public services Housing rehabilitation assistance and program delivery
4	Project Name	HOME Planning and Administration
	Target Area	Urbana Consortium-wide Area
	Goals Supported	Planning and Administration
	Needs Addressed	Affordable Housing Community Services Community Development
	Funding	HOME: \$63,000.00
	Description	Planning and Administration to support HOME funded activities.
	Target Date	6/30/2027

	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	Planning and administration to support HOME funded activities.
5	Project Name	CHDO Developer Support
	Target Area	Urbana Consortium-wide Area
	Goals Supported	Invest in Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$150,000.00
	Description	15% set-aside to support affordable housing development by certified Community Housing Development Organizations (CHDOs).
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 5 low-income households will benefit from the proposed activities.
	Location Description	Activities will take place within the Consortium-wide area (cities of Urbana, Champaign, and unincorporated Champaign County).
	Planned Activities	CHDO affordable rental and homeowner housing development.
6	Project Name	CHDO Operating Support
	Target Area	Urbana Consortium-wide Area
	Goals Supported	Invest in Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$30,000.00
	Description	Operating support for certificated CHDOs to build affordable housing.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	N/A - operating funds will be provided directly to CHDOs for administrative support related to affordable housing program.

	Location Description	Activities will take place within the Consortium-wide area (cities of Urbana, Champaign, and unincorporated Champaign County).
	Planned Activities	CHDO operating activities.
77	Project Name	TBRA
	Target Area	Urbana Consortium-wide Area
	Goals Supported	Support Households in Need
	Needs Addressed	Affordable Housing Community Services
	Funding	HOME: \$100,000.00
	Description	HOME funds will be used to support service provider agencies that provide tenant-based rental assistance to low-income households.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 12 households will benefit from TBRA assistance.
	Location Description	Activities will take place within the Consortium-wide area (cities of Urbana, Champaign, and unincorporated Champaign County).
	Planned Activities	TBRA
8	Project Name	Champaign Affordable Housing Development
	Target Area	Beardsley Park Neighborhood Improvement Plan Area Garden Hills United Neighborhood Association Action Plan Bristol Park Neighborhood Plan Area Champaign Planning Area 14
	Goals Supported	Invest in Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$206,782.00
	Description	As a member of the Urbana HOME Consortium, the City of Champaign receives a percentage of the annual HOME allocation. The City of Champaign will use HOME funds to develop affordable rental and homeowner housing, as well as other neighborhood revitalization activities as needed.
	Target Date	6/30/2027

	Estimate the number and type of families that will benefit from the proposed activities	An estimated 2 affordable units will be produced.
	Location Description	City of Champaign local target areas.
	Planned Activities	Activities include affordable rental and homeowner housing development, and neighborhood revitalization activities.
9	Project Name	Urbana Affordable Housing Development
	Target Area	Urbana Community Development Target Area
	Goals Supported	Invest in Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$83,372.18
	Description	As a member of the Urbana HOME Consortium, the City of Urbana receives a percentage of the annual HOME allocation. The City will use HOME funds to develop affordable rental and homeowner housing, as well as other neighborhood revitalization activities as needed. As in prior years, the City of Urbana will commit a portion of its HOME allocation to Champaign County Regional Planning Commission for TBRA.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 1 unit will be produced.
	Location Description	The Urbana Community Development Target Areas consist of census blocks with 51% or more low- to -moderate income households.
Planned Activities	Activities include affordable rental and homeowner housing development, and neighborhood revitalization activities.	

AP-50 Geographic Distribution - 91.420, 91.220(f)

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

The City of Urbana is the county seat of Champaign County, Illinois. The population is estimated at 38,336 as of June 1, 2020. Urbana is the tenth-most populous city in Illinois outside of the Chicago metropolitan area. Urbana is notable for sharing the campus of the University of Illinois at Urbana–Champaign with its sister city of Champaign. The three largest employers in Urbana are two non-profit hospitals and the University of Illinois.

The City of Urbana and Urbana HOME Consortium will direct HUD assistance to low-income areas identified through the Consolidated Planning process. In the City of Urbana, assistance will be prioritized in the Community Development Target Area. These areas have disproportionately greater housing and community development needs than other areas of the city due to many factors, including the historical impacts of red lining.

Geographic Distribution

Target Area	Percentage of Funds
Beardsley Park Neighborhood Improvement Plan Area	10
Garden Hills United Neighborhood Association Action Plan	100
Urbana Consortium-wide Area	20
Bristol Park Neighborhood Plan Area	40
Champaign Planning Area 14	10
Urbana Community Development Target Area	10

Table 4 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Target neighborhoods are those census tracts with populations for which at least 51% of the total number of households are at or below 80% of the area median family income. Total above exceeds 100%. Since all local target areas are within the Urbana HOME Consortium-wide Area, percentage of funds distributed within the consortium-wide area is 100%.

Discussion

While HOME and CDBG funded projects and activities are available to all households that meet the low-mod income definition, targeted efforts will be made to market programs and services to these specific areas.

Affordable Housing

AP-55 Affordable Housing - 91.420, 91.220(g)

Introduction

The City of Urbana will use its HOME funds to support its affordable housing and neighborhood development program activities, which may include: TBRA, new construction, down payment assistance, acquisition-rehab, purchase-rehab-resale, rental rehab, owner-occupied rehabilitation, lot acquisition/demolition, and/or other programs currently under development or may be proposed that further the affordable housing goals and mission of the City, Council, and Grants Management Division. Programs must comply with applicable local, state and federal regulations, including but not limited to HOME regulations.

One Year Goals for the Number of Households to be Supported	
Homeless	4
Non-Homeless	66
Special-Needs	5
Total	75

Table 5 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	22
The Production of New Units	23
Rehab of Existing Units	30
Acquisition of Existing Units	0
Total	75

Table 6 - One Year Goals for Affordable Housing by Support Type

Discussion

N/A

AP-60 Public Housing - 91.420, 91.220(h)

Introduction

The Housing Authority of Champaign County (HACC) is a Move to Work (MTW) organization. Move to Work (MTW) is a demonstration that provides a limited number of Public Housing Authorities with the ability to design and test innovative approaches tailored to their communities, using federal dollars more efficiently, providing increased support for families to become economically self-sufficient, and increasing housing choice for low-income households. The broad flexibility to waive statutes and regulations allows HACC to better serve and house residents while streamlining internal operations.

The seven-member HACC Board of Commissioners consists of two commissioners appointed by each of the Cities of Urbana and Champaign, an appointee that rotates between the two cities called a “floating” appointee, a commissioner appointed by the Champaign County Board, and a commissioner appointed from among residents of the HACC properties.

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

The Housing Authority continues to partner with landlords to increase engagement and provide incentives. For example, consortium member agencies are collaborating with the Housing Authority and other housing service providers in the community to pilot a landlord risk mitigation fund. This program provides reimbursements to landlords who have agreed to participate in voucher programs and have experienced damage to their units from voucher holders.

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

HACC continues its partnership with CHDO organizations to provide affordable homeownership and rental opportunities to residents. The Consortium will seek ways to continue to support CHDOs, which will in turn further the goals set by the HACC for its public housing residents seeking to transition into homeownership.

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

The Housing Authority of Champaign County is not designated as a troubled PHA.

Discussion

N/A

AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)

Introduction

The most detailed data on homelessness in Champaign County is collected on an annual basis during the Point-in-Time (PIT) count each January. The 2025 PIT count found 355 homeless individuals with 299 sheltered and 56 unsheltered. This represents a continued increase from counts in previous years (215 individuals in 2023, 279 individuals in 2024).

Both children and young adults were found experiencing homelessness: this total number includes 75 children (under 18) and 40 young adults (aged 18-24). The remaining 240 individuals were over the age of 24, including 14 individuals aged 65 or older.

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

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

The City of Urbana and the Urbana HOME Consortium will continue to partner closely with the Champaign County Continuum of Services Providers to the Homeless (CSPH). Starting in 2024, the CSPH received a grant from the State of Illinois to support stipends for individuals with lived experience to serve on the Executive Committee. This program has greatly increased the participation of individuals with lived experience in the Committee's decision-making process.

Through the City of Urbana's Housing and Homelessness Innovations grant opportunity, funded in part through HOME-ARP, local street outreach capacity has expanded in recent years.

Addressing the emergency shelter and transitional housing needs of homeless persons

Strides Shelter, which is operated by the City of Champaign Township, is the only low-barrier emergency shelter option in Champaign County. The current capacity of Strides is approximately 60 beds per night. Champaign County Regional Planning Commission operates an emergency shelter for families, and Courage Connection is the domestic violence shelter in Champaign County.

County-wide, there are a variety of other non-congregate shelter options available for individuals and families, however consultation with service provider shows many shelter often operate at or near capacity. Expanding capacity, in addition to more affordable units in general, is essential to continue moving individuals smoothly through the continuum of services.

The CSPH continues to seek ways to expand emergency shelter capacity, especially during the winter months. In winter of 2025/26, a winter overflow shelter was operated by Cunningham Township, in

partnership with Friend in Me, two local service providers.

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

Many local government agencies and non-profits in the community work to help homeless individuals meet these goals. The CSPH maintains strong ties with the VA and other organizations that serve veterans, including Salvation Army. In addition, Consortium member agencies continue to provide funds to social service providers in order to expand existing supportive service programs that already exist. For example, the Housing & Homeless Innovations Consolidated Grant Program, which is funded with HOME ARP, City of Urbana ARPA, and city general funds, was launched in the Winter of 2025 and these programs continue to provide funding to support vital case management, housing navigation, and shelter programs and services throughout ongoing grant terms.

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

The Champaign County Continuum of Service Providers to the Homeless seeks to address homelessness at each stage of homelessness, beginning with prevention. Several CoC member agencies provide utility assistance, as well as connections to job training programs in the community. In addition, the Champaign County Regional Planning Commission continues to provide security deposit assistance to low-income households. The City of Urbana uses CDBG Public Service funding along with city general funds to support grants to local non-profit service providers. The goal of this funding opportunity is to fund community-based programs and services for low-income households. In recent years, this funding has gone toward recidivism prevention programs, job training opportunities, short-term emergency rental assistance, and violence intervention programming.

Discussion

N/A

AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

The need for affordable housing units currently outweighs the current funding available to construct or subsidize those units, or to acquire land for affordable housing purposes. A related issue is that existing affordable housing developer capacity is limited; other than the Housing Authority of Champaign County, local affordable housing developers tend to work on small scale projects for which prospective applicants outpace the number of units being built. For larger affordable housing developments in recent years, Consortium members have worked in partnership with external affordable housing developers to expand local affordable housing stock (Bristol Seniors and Parker Glen II developments).

In addition to financial gaps, other social aspects play a role in an individual or family's ability to secure affordable housing, including mental illness, unemployment, drug and/or alcohol addictions, as well as a criminal record, though some progress has been made in addressing these barriers. In 2020, the Housing Authority of Champaign County revised its criminal background screening policy to only review offenses explicitly required by HUD. The City of Urbana prohibits discrimination based on arrest or conviction record. In Champaign, landlords may still refuse prospective tenants for certain felonies within two years of incarceration.

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

Because zoning is one of the primary tools used to regulate development, staff from City Planning Divisions within the HOME Consortium actively monitor its use. Zoning designations that restrict multifamily land uses and mandate large lot size minimums can increase development costs and restrict supply, which may contribute to lack of affordability. Overly restrictive zoning policies also reinforce patterns of segregation and unfair housing practices by separating single-family homes and multifamily rental housing, which tend to serve different demographics. Currently, much of Urbana's residentially zoned land only allows single-family residential uses by-right. The City of Urbana recently completed a new Comprehensive Plan with goals related to addressing housing needs in relation to development regulations. A goal is to follow the Comprehensive Plan with zoning policy revisions related to addressing identified housing needs and goals.

In recent years, the City of Champaign has passed code updates permitting ADUs, support infill development, and reduce parking restrictions.

Both cities are currently in the process of completing housing studies, which will be used to identify

barriers to affordable housing and strategize toward solutions.

Discussion

N/A

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

Proposed actions associated with the City's 2026-2027 Annual Action Plan are described in the specifically related sections of the Plan. This section describes any actions to be undertaken by the City of Urbana that will further the goals of the 2025-2029 Consolidated Plan.

The city of Urbana agrees that its compliance in all respects with all applicable Federal anti-discrimination laws is material to the U.S. Government's payment decisions for purposes of section 3729(b)(4) of title 31, United States Code. The city of Urbana will not operate any programs that violate any applicable Federal anti-discrimination laws, including Title VI of the Civil Rights Act of 1964."

Actions planned to address obstacles to meeting underserved needs

The City of Urbana will continue to focus its community development efforts on expanding affordable housing opportunities and fostering strong and vibrant neighborhoods to meet underserved needs in the community. Affordable housing needs will be addressed by focusing on the housing cost burden. Investments made in affordable housing developments will continue to address the limited supply and rising cost of housing, which has exacerbated challenges like homelessness. The creation of strong and vibrant neighborhoods will focus on support for low- and moderate-income persons. Strategic investments in infrastructure, public facility improvements, and community assets will address needs and strengthen and enhance the health of the neighborhoods.

The City will continue to supplement HUD investments with other state and local funds in addressing community needs.

Actions planned to foster and maintain affordable housing

City staff manage a comprehensive housing rehabilitation program using CDBG funds. This program targets low-income homeowners in the City's targeted census tracts. Funds can provide emergency repair assistance to address health or safety concerns and accessibility modifications and improvements for individuals with a disability. The City also uses CDBG funds for code enforcement and blight reduction activities intended to maintain healthy and livable neighborhoods.

Actions planned to reduce lead-based paint hazards

Staff use Lead Safe Practices in implementing its housing rehabilitation activities. The city's housing inspectors are lead certified and lead based paint remediation policies and procedures are included in each housing rehabilitation contract funded with federal funds. Contractors are required to follow lead-safe work practices to comply with local, state, and federal requirements. City staff will also consider funding opportunities for lead abatement activities outside of existing programs based on availability

and capacity.

Actions planned to reduce the number of poverty-level families

The Tenant-Based Rental Assistance programs in the Consortium-wide area are targeted toward persons who are below the poverty level. The combination of self-sufficiency case management and stable housing is intended to assist households in escaping poverty. Staff will evaluate these programs for their effectiveness during the Annual Action Plan year. Economic Development opportunities will be provided to small businesses located in Community Development Target areas. Priority funding will be made available to social service agencies that target youth programming for low-income families.

The city will continue its poverty reduction strategy by focusing its programs in geographic areas. By working closely with residents and concentrating programs and public improvements in a specifically targeted neighborhood, the community will feel a greater impact. Key strategies include improving public infrastructure within target areas and coordinating city-funded programs and services with other funders, businesses, and neighborhood groups.

The City of Urbana Community Services Grant, currently funded by City general funds, provides funding opportunities for local organizations providing social services to low-income Urbana households.

Actions planned to develop institutional structure

Urbana staff work to foster creative ideas for improving the institutional structure that is part of a larger, more holistic network of services that benefit low-income households. By supporting various social service agencies through staff participation in the Continuum of Service Providers to the Homeless, the City of Urbana plays a role in developing programmatic improvements to strategizing capacity that will further the impact of services in the community.

Furthermore, the city is engaging a consultant to examine the feasibility of developing an alternative response system within the city. This process will involve engaging with community-based service providers and those in the justice involved community to develop a proposal for consideration. Urbana Grants staff will be involved in this process and will examine how CPD funds can potentially be leveraged to support an alternative responder model.

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

The City of Urbana will continue its efforts to increase coordination and collaboration with the public and private housing and social service agencies in the community. Urbana staff regularly attend board meetings for the Housing Authority of Champaign County. The City also maintains an active presence on the Continuum of Service Providers to the Homeless, offering assistance with various reporting and application systems inherent to the successful delivery of the Continuum of Care network, such as the

ESG and CoC grants.

Furthermore, in their role as a member of the CoC Executive Committee, City staff have supported the Housing Authority in its decision to accept Stability Housing Vouchers. These vouchers will provide another important resource for individuals who are experiencing or at risk of experiencing homelessness in the community. The City plays an active role in the Community Reinvestment Group, a group of local lenders looking to address affordable housing issues in the community.

Discussion

The success of these efforts is dependent upon continued CPD funding through the CDBG and HOME programs. These funds are a critically important resource in the community, and cuts to the city's entitlement allocations will hamper ongoing efforts to serve low-income households in our community.

Ordinance No. 2024-12-042

AN ORDINANCE ESTABLISHING APPROVAL, POLICY, AND REPORTING REQUIREMENTS FOR SURVEILLANCE TECHNOLOGY

WHEREAS, the City of Urbana (“City”) is a home rule unit of local government pursuant to Article VII, Section 6, of the Illinois Constitution, 1970, and may exercise any power and perform any function pertaining to its government and affairs, and the passage of this Resolution constitutes an exercise of the City’s home rule powers and functions as granted in the Illinois Constitution, 1970; and

WHEREAS, the City of Urbana reaffirmed its commitment as a sanctuary city in Resolution No. 2016-12-070R, stating that “the City Council and the Mayor will join with councils and mayors from other communities around the country to stand with our immigrant residents and defend policies that welcome and protect immigrants...” and that “no city employee or official or department or agency of the City of Urbana shall request information about or otherwise investigate or assist in the investigation of the citizenship or immigration status of any person unless such inquiry or the investigation is required by a court order...”; and

WHEREAS, the City of Urbana adopted the Ten Shared Principles on June 22, 2020 in Resolution No. 2020-06-031R which states “We reject discrimination toward any person that is based on race, ethnicity, religion, color, nationality, immigrant status, sexual orientation, gender, disability, or familial status;” provides support to “build and rebuild trust through procedural justice, transparency, accountability, and honest recognition of past and present obstacles” and advocates for “the four pillars of procedural justice, which are fairness, voice (i.e., an opportunity for citizens and police to believe they are heard), transparency, and impartiality”; and

WHEREAS, it is the Urbana City Council (“Council” or “City Council”) and City’s responsibility to legislate matters of public safety and accountability to the public, and any use or expense of surveillance technology require due public process and approval from City Council; and

WHEREAS, the Urbana City Council finds that no decision relating to surveillance technology should be made without collaborative community input and consideration of the impact such technologies may have on civil rights and civil liberties, including those rights guaranteed by Article I of the Illinois Constitution and the First, Fourth, and Fourteenth Amendments to the United States Constitution; and

WHEREAS, the use of surveillance technologies are known to have had a significant, detrimental impact on civil rights and civil liberties, namely the invasion of an individual's privacy and infringing on their right to be left alone, including those guaranteed by the First, Fourth and Fourteenth Amendments to the United States Constitution, and thus it is incumbent on the police seeking to fund, acquire, or use a surveillance technology to expressly identify the potential adverse impacts the technology may have on civil rights and civil liberties and what specific measures it will undertake to prevent such adverse impacts; and

WHEREAS, surveillance technologies can create oppressive, stigmatizing environments when used indiscriminately, continuously, or pervasively, especially for communities that have historically been disproportionately targeted by their use, such as communities of color, low-income communities, and politically active communities; and

WHEREAS, the urgency to publicly process the acquisition of surveillance technologies is necessitated by new concerns whether surveillance technologies will be used to apprehend people from out-of-state seeking abortions and other reproductive healthcare in Illinois; people without legal immigration status who seek asylum and would be sought for deportation; peaceful individuals or organizations exercising their rights, including expressing grievances against the government; and people whose race, national origin, ethnic identity, gender identity, sexual orientation, or other protected demographics place them under potential for additional surveillance; and

WHEREAS, the need for a public process to acquire surveillance technologies is further required because of the likelihood that federal law enforcement agencies will access any data stored by surveillance technologies; and

WHEREAS, as of the passing of this ordinance, there is no current city policy on the use and acquisition of police surveillance technology, and it is therefore necessary to clarify the Council's position on the required processes of public accountability;

NOW THEREFORE BE IT ORDAINED by the City Council, of the City of Urbana, Illinois, as follows:

Section 1. Purpose:

The purpose of this ordinance is to provide transparency, oversight, and accountability regarding the acquisition and use of surveillance technology and the data it collects by the City of Urbana police department, and to protect privacy, civil rights, and racial and immigrant justice.

Section 2. Approval Process for Surveillance Technology Acquisition or Use

(a) When the Police Department seeks to acquire or use new surveillance technology or change an existing Use Policy, it shall, prior to such acquisition or use obtain approval by majority vote of the Urbana City Council prior to purchasing, acquiring, or using any new surveillance technology (as defined in Attachment A of this Ordinance), which includes adding data from a new source or new analytic tools in a manner which changes the functionality of the existing data collected by the surveillance technology.

(b) At least thirty (30) days prior to seeking approval of a surveillance technology, the City shall submit to the City Council and make publicly available a written and unredacted surveillance technology “Use Report,” along with a draft of the proposed surveillance technology “Use Policy” (as defined in Attachment A of this Ordinance). During this time, the public will have the opportunity to provide input to the City Council.

(c) Once approved or denied by the City Council, surveillance technology may be reconsidered under the following circumstances and procedures:

(1) Twelve (12) months or more after its most recent vote to approve or reconsider the technology;

(2) At any time, due to a demonstrable material change in circumstances that may affect the City Council’s intent in previously approving or denying the use of a particular technology, including but not limited to the following:

a. evidence showing that the approved use of a technology has led to an outcome indicating a discriminatory impact or some other infringement of individual rights;

b. a change in the law that changes or materially impacts the previously approved or denied use of such technology;

c. the revelation of a previously unknown capability, functionality, or application of the approved technology that is inconsistent with the City Council’s previous intent in approving or denying the technology; or

(3) A request to reconsider a previously approved or denied surveillance technology may be placed on a Committee of the Whole agenda by the Mayor or by council members consistent with City Council rules in effect at the time of the request.

(4) Once a request for reconsideration is placed on a Committee of the Whole agenda, the City Council must then vote on whether to proceed with formal reconsideration of the technology.

(5) Approval of reconsideration under paragraph (c)(1) of this section shall be by a simple council majority. Approval of reconsideration under paragraph (c)(2) of this section shall be by a 2/3 vote of the corporate authorities.

(6) If a request for reconsideration is approved by the City Council, the party requesting reconsideration will present to the City Council the material basis for the reconsideration, if applicable, and any proposed Council action, at a future Committee of the Whole meeting.

Section 3. Standard for Approval of Surveillance Technology

a) When evaluating a request for the use of surveillance technology, the City Council may consider a range of factors, including but not limited to:

- i) The potential public safety benefits and effectiveness of the technology.
- ii) The economic, social, and community costs associated with its implementation and use.
- iii) Any potential impacts on civil liberties and civil rights, including privacy concerns.
- iv) The possibility of disparate impacts on specific communities or groups.
- v) Safeguards or oversight mechanisms that could mitigate risks or unintended consequences.
- vi) Alternative methods or technologies that could achieve similar outcomes with fewer negative effects.

Section 4. Reporting and Approval of Existing Surveillance Technologies

(a) For all existing or hereinafter approved surveillance technology in use, a “Surveillance Technology Annual Report” will be publicly available and presented to City Council each year, which includes a current copy of the “Use Policy” for each technology and other information included in the definitions in Attachment A.

(b) For all surveillance technology referenced here that are already in use at the time this Ordinance is approved:

- (i) The City shall present to City Council a “Use Report” and “Use Policy” for each technology in use, within one hundred twenty (120) days of the passing of this Ordinance, unless otherwise extended with approval by majority vote from City Council. No more than two (2) extensions shall be granted for any individual technology or database in use.

(ii) The existing surveillance technologies shall require a formal approval process (as outlined in Section 2 and 3 of this Ordinance) as soon as the information on each technology is made available.

(iii) If the Council has not approved the continuing use of the surveillance technology, including the Use Report and the Use Policy, within one hundred eighty (180) days of its submission to the Council, unless otherwise extended, the City Department shall cease its use of the surveillance technology and the sharing of surveillance data therefrom until such time as Council approval by majority vote is obtained in accordance with this Ordinance.

(iv) During the period that continued use is not yet approved, the technology or database contract shall not be renewed or extended even if the result would be the termination of availability of the use before one hundred eighty (180) days.

Section 5. Contractual Agreements Involving Surveillance Technology

(a) Except where otherwise allowed under this Ordinance all contracts or agreements for the acquisition or use of surveillance technology, regardless of duration or cost, shall require formal approval by a majority vote of the City Council prior to execution.

(b) Prior to approval, City Departments, through the Mayor's Office, shall provide all members of City Council with a complete copy of any and all contract(s) or other agreement(s) for the purchase, acquisition, or use of any new surveillance technology. Consistent with its obligations under the Illinois Freedom of Information Act (FOIA) and current practice, the City shall not enter into a nondisclosure agreement or contractual confidentiality provision with any surveillance technology vendor or third party provider that limits or purports to limit the disclosure of records or information subject to FOIA..

(c) The City shall not enter into any contract or other agreement that facilitates the sharing of surveillance data in the City's possession with any non-governmental entity or third party in exchange for money or other consideration, whether or not such surveillance data was generated by or is owned by the City. Any such contracts or agreements signed prior to the enactment of this ordinance that are inconsistent with this section shall be terminated as soon as is permissible under the terms of the agreement.

Section 6. Disaster Circumstances

(a) Notwithstanding the provisions of this ordinance, the Urbana Police Department may temporarily acquire or temporarily use surveillance technology in disaster circumstances for a period not to exceed thirty (30) days, with approval from the Mayor or their designee, without following the provisions of approval stated in this ordinance before that acquisition or use. No more than two (2) consecutive periods of disaster circumstantial use shall be granted for any individual technology or database.

(b) If the Urbana Police Department acquires or uses surveillance technology in disaster circumstances under this section, the Department must:

(i) Report that acquisition or use to the City Council in writing within thirty (30) days following the end of those disaster circumstances and the use of the surveillance technology.

(ii) Submit a Use Report and, if necessary, a technology-specific Use Policy to the City Council regarding that Surveillance Technology within thirty (30) days following the end of those disaster circumstances.

(iii) Include that surveillance technology in the next Surveillance Technology Annual Report to the City Council following the end of those disaster circumstances.

(iv) If the City Department is unable to meet the 30-day timeline to submit a surveillance technology Use Report and, if necessary, a technology-specific Use Policy to the City Council, the City Department must notify the City Council in writing requesting to extend this period. The City Council may grant extensions in 30-day increments beyond the original 30-day timeline to submit a surveillance technology Use Report, and, if necessary, a technology-specific Use Policy.

(v) Any surveillance technology Use Report, and, if necessary, any technology-specific Use Policy submitted to the City Council under this subsection shall be made publicly available on the City's website upon submission to the City Council.

(vi) Any Surveillance Technology Use Report and, if necessary, technology-specific Use Policy submitted to the City Council under this section may be redacted to the extent required to comply with an order by a court of competent jurisdiction, or to exclude information that, in the reasonable discretion of the Urbana Police Department or other City Department, would, if disclosed, materially jeopardize an

ongoing investigation or otherwise represent a significant risk to public safety and security; provided, however, that any information redacted pursuant to this paragraph will be released in the next Surveillance Technology Annual Report following the point at which the reason for such redaction no longer exists.

(c) Departments using approved surveillance technologies or other technologies with unutilized and unapproved surveillance capabilities may apply a technical patch or upgrade that is necessary to maintain essential operations or to mitigate cyber security threats to the City. The department shall not use any unapproved new surveillance capabilities of the technology until the requirements of this ordinance are met or unless the Mayor or the Mayor's designee determines that the use is unavoidable; in that case, the Mayor shall request City Council approval as soon as possible. The request shall include a report to the City Council of how the altered surveillance capabilities were used since the time of the upgrade.

Section 7. Destruction of Improperly Collected Data

(a) Prohibition on Use or Disclosure

Any data collected through the use of surveillance technology in violation of this ordinance, and any data or information derived from such data, shall not:

1. Be knowingly used or introduced as evidence by any City department, agency, employee, or official in any criminal, civil, or administrative proceeding against any member of the public, except in a proceeding alleging a violation of this ordinance; or
2. Be knowingly disclosed or provided by any City department, agency, employee, or official to any other person or entity for the purpose of investigation, enforcement, or evidentiary use.

(b) Preservation Pending Review

Upon discovery that data may have been created or collected in violation of this ordinance, the City department possessing the data shall:

1. Segregate and preserve the data pending review; and
2. Promptly notify the appropriate prosecuting authority if the data relates to a known or reasonably foreseeable criminal investigation or prosecution.

(c) Review for Evidentiary and Discovery Obligations

Before any deletion or destruction of data subject to this section:

1. The appropriate prosecuting authority shall be given a reasonable opportunity to determine whether the data must be preserved to comply with constitutional, statutory, or court-imposed disclosure obligations, including obligations recognized under *Brady v. Maryland* and applicable Illinois discovery rules.

2. If the prosecuting authority determines that the data may be material to the defense in a criminal case, a copy of the potentially material data shall be disclosed to the defendant in accordance with applicable law before any deletion or destruction.

(d) Deletion and Destruction

After completion of the review described above, and once the City determines that retention is not required by law, court order, evidentiary obligations, or pending litigation, the data and any derivatives shall be permanently deleted or destroyed as soon as possible under applicable records retention requirements.

(e) Documentation

The City department or agency responsible for the surveillance technology shall document:

1. The determination that the data was collected in violation of this ordinance;
2. Any review conducted under subsection (c); and
3. The date and method of deletion or destruction.

Such documentation shall be retained in accordance with applicable records retention laws.

Section 8. Surveillance Technology Reporting Oversight and Policy Review

- (a) The Civilian Police Review Board (CPRB) shall review each Surveillance Technology Annual Report, Use Report, and Use Policy of surveillance technology or database subject to this ordinance, with a final vote on the recommendation by CBRP before moving to the Urbana City Council Committee of the Whole. If the CPRB is not able to review the reports and policies in a reasonable time-frame due to logistical factors, the City Department will present the reason for lack of CPRB review to council.
- (b) The CPRB and the Human Rights Commission (HRC) may hear complaints within their existing authority under the City Code that involve the use of surveillance technology or databases.
- (c) Upon request by the CPRB or HRC, City Departments shall provide records relevant to a complaint properly before that body that involves the use of surveillance technology or databases.
- (d) The City Council and CPRB, in its review of Surveillance Technology Annual Reports and Use Reports, may request and shall be entitled to receive and review records related to the use of such technology by City Departments.

Section 9. Incorporation of State Law; Conflict

The Protecting Household Privacy Act, 5 Illinois Compiled States 855/1 set seq., the Freedom from Drone Surveillance Act, 725 Illinois Compiled Statutes 167/1 et seq., and the Freedom from Location Surveillance Act, 725 Illinois Compiled Statutes 168/1 et seq., are incorporated herein by reference as part of this article. In the case of a conflict between a provision of state law and a provision of this article, the more stringent provision shall control.

Section 10. Definitions

The list of relevant definitions is included in Attachment A as part of this Ordinance.

[The final version will be formatted for city code]

PASSED BY THE CITY COUNCIL this ____ day of _____, 2026.

AYES:

NAYS:

ABSTENTIONS:

Darcy E. Sanderfur, City Clerk

APPROVED BY THE MAYOR this ____ day of _____, 2026.

Diane Wolfe Marlin, Mayor

ATTACHMENT A
(Ordinance No. 2024-12-042)

Definitions:

1) *Disaster Circumstances* mean occurrences that are determined by the Mayor or their designee to meet the definition of a “disaster” under the Illinois Emergency Management Agency Act (220 ILCS 3305/1 et seq), meaning “an occurrence or threat of widespread or severe damage, injury or loss of life or property resulting from any natural, technological, or human cause, including but not limited to fire, flood, earthquake, wind, storm, hazardous materials spill or other water contamination requiring emergency action to avert danger or damage, epidemic, air contamination, blight, extended periods of severe and inclement weather, drought, infestation, critical shortages of essential fuels and energy, explosion, riot, hostile military or paramilitary action, public health emergencies, cyber incidents, or acts of domestic terrorism.” The use of surveillance technology in disaster circumstances shall not infringe upon an individual’s right to peacefully protest or exercise other lawful and protected constitutional rights.

2) *Surveillance* means the act of observing or analyzing the movements, behavior, or actions of identifiable individuals.

4) *Surveillance Technology* means any device, hardware, or software that is capable of collecting, capturing, recording, retaining, processing, intercepting, analyzing, monitoring, or sharing audio, visual, digital, location, thermal, biometric, associational, or similar information specifically associated with, or capable of being associated with, any identifiable individual or group; or any system, device, or vehicle that is equipped with an electronic surveillance monitoring device, hardware, or software.

a) Examples of Surveillance Technology include, but are not limited to:

1. International mobile subscriber identity (IMSI) catchers and other cell-site simulators;
2. Automatic license plate readers;
3. Closed-circuit television cameras except as otherwise provided herein;
4. Biometric Surveillance Technology, including facial, voice, iris, and gait-recognition software and databases;
5. Gunshot detection and location hardware and services;
6. GPS tracking systems that monitor an individual’s location without authorization;
7. X-ray vans;
8. Video and audio monitoring and/or recording technology that can be remotely accessed, including privately owned devices such as doorbell or private security cameras;

9. Surveillance enabled or capable light bulbs or light fixtures;
10. Tools, including software and hardware, used to gain unauthorized access to a mobile device, computer, computer service, or computer network;
11. Social media monitoring software;
12. Through-the-wall radar or similar imaging technology;
13. Passive scanners of radio networks;
14. Long-range Bluetooth and other wireless-scanning devices;
15. Thermal imaging or “forward-looking infrared” devices or cameras;
16. Electronic database systems containing or analyzing surveillance data about identifiable individuals;
17. Radio-frequency identification (RFID) scanners; and
18. Use of aerial drones by or on behalf of the City within City limits, in addition to compliance with the Illinois Freedom from Drone Surveillance Act
19. Software designed to integrate or analyze data from surveillance technology, including surveillance target tracking and predictive policing software.

b) Surveillance Technology does not include the following devices, software, or hardware, which are exempt from the requirements of this ordinance, unless the devices, hardware, or software are modified to include additional surveillance capabilities:

1. Routine office hardware, such as televisions, computers, and printers, that are in widespread public use and will not be used for any surveillance or surveillance- related functions;
2. Parking ticket devices (PTDs) and related databases;
3. Manually-operated, non-wearable, handheld digital cameras, audio recorders, and video recorders that are not designed to be used surreptitiously and whose functionality is used for manually capturing and manually downloading video and/or audio recordings;
4. Cameras installed in or on a police vehicle;
5. Body-worn cameras as required by the Illinois Law Enforcement-Worn Body Camera Act, 50 ILCS 706/10-1 *et seq.*, as amended;
6. Cameras installed pursuant to state law authorization in or on any vehicle or along a public right-of-way solely to record traffic violations or traffic patterns, provided that the Surveillance Data gathered is used only for that purpose;
7. Surveillance devices that cannot record or transmit audio or video or be remotely accessed, such as image stabilizing binoculars or night vision goggles;
8. City databases that do not and will not contain any Surveillance Data or other information collected, captured, recorded, retained, processed, intercepted, or analyzed by Surveillance Technology;

9. Manually-operated technological devices that are used primarily for internal City communications and are not designed to surreptitiously collect Surveillance Data, such as radios and email systems;
10. Card readers and key fobs used by City employees and other authorized persons for access to City-owned or controlled buildings and property;
11. Cameras installed on City property solely for security purposes, including closed-circuit television cameras installed by the City to monitor entryways and outdoor areas of City-owned or controlled buildings and property for the purpose of controlling access, maintaining the safety of City employees and visitors to City buildings, and protecting City property;
12. Security cameras including closed-circuit television cameras installed by the City to monitor cashiers' windows and other cash-handling operations on City property and to maintain the safety of City employees and visitors to such areas;
13. Technology that monitors only City employees in response to complaints of wrongdoing or in order to prevent waste, fraud, or abuse of City resources.
14. Personal communication devices that have not been modified beyond stock manufacturer capabilities in a manner described above, provided that any bundled Face Recognition Technology is only used for the sole purpose of user authentication in the regular course of conducting City business.

(c) "Use Report" shall mean a publicly released, legally enforceable written report that includes, at a minimum, the following:

- (i) Information describing the surveillance technology and how it works.
- (ii) Information on the proposed purpose(s) of the surveillance technology.
- (iii) If the surveillance technology will not be uniformly deployed throughout the city, what factors will be used to determine where the technology will be deployed or targeted, and the location(s) where it may be deployed and crime statistics for such location(s).
- (iv) The fiscal impact of the surveillance technology, including initial purchase and other known ongoing costs, including impact on personnel time, along with any current or potential sources of funding.
- (v) An assessment of whether use of the surveillance technology will have an unwarranted disparate impact on protected classes and demographics, as defined in the Illinois Civil Rights Act of 2003, the Urbana Human Rights Ordinance, and other relevant laws and policies.

(vi) An assessment identifying any potential adverse impacts the surveillance technology, if deployed, might have on civil liberties and civil rights, and what specific, affirmative measures will be implemented to safeguard the public from the potential adverse impacts.

(vii) Whether use or maintenance of the surveillance technology will require data gathered by the technology to be handled or stored by a third-party vendor on an ongoing basis.

(d) “Use Policy” shall mean a publicly released, legally enforceable written policy governing the use of the surveillance technology that, at a minimum, includes and addresses the following:

(i) Purpose: What specific purpose(s) the surveillance technology is intended to advance.

(ii) Description of the authorization for use of the surveillance technology: specifically, what legal and procedural rules will govern each authorized use; what potential uses of the surveillance technology will be expressly prohibited such as the warrantless surveillance of public events and gatherings; and how and under what circumstances will surveillance data that was collected, captured, recorded, or intercepted by the police technology be analyzed and reviewed.

(iii) Description of data collection, protection, and retention: specifically, what types of surveillance data will be collected, captured, recorded, intercepted, or retained by the police technology; what safeguards will be used to protect surveillance data from unauthorized access; for what maximum limited time period the surveillance data will be retained; and by what process the surveillance data will be regularly deleted after the retention period.

(iv) Description of data sharing: specifically, which governmental agencies, departments, bureaus, divisions, or units will be approved for data sharing; how such sharing is necessary for the stated purpose and use of the surveillance technology; and what mechanisms will ensure any entity sharing access to the surveillance technology or surveillance data complies with the applicable surveillance use requirements within the Urbana “Use Policy” and does not further disclose the surveillance data to unauthorized persons and entities.

(v) Training: The training required for any individual authorized to use the surveillance technology or to access information collected by the surveillance technology.

(vi) Auditing and Oversight: The mechanisms to ensure that the surveillance use policy is followed, including internal personnel assigned to ensure compliance with the surveillance use policy, internal record keeping of the use of the technology or access to information collected by the technology, technical measures to monitor for misuse, any independent person or entity with oversight authority.

(e) “Surveillance Technology Annual Report” shall mean a written report covering each surveillance technology in use over the past year that is publicly released at least once per year and shall, at a minimum, include the following:

- (i) A summary of how each surveillance technology was used, including locations and neighborhoods where technology or equipment was deployed, and information that may assist the City Council to assess whether the surveillance technology has been effective at achieving its identified purposes.
- (ii) Total annual costs for each surveillance technology and database, including personnel and other ongoing costs, and what source of funding will fund the technology in the coming year.
- (iii) How often and what type of collected surveillance data was shared with and received from any external persons or entities; under what legal standard(s) the information was disclosed; and the justification for the disclosure(s).
- (iv) A summary of complaints or concerns that were received about each surveillance technology.
- (v) The results of any internal audits, any information about violations of the Use Policy, and any actions taken in response to complaints or concerns.
- (vi) Justification for the continued use of each surveillance technology.