

Homeless activities will be funded on a citywide basis. Acquisition costs, proximity to bus lines, the current location of feeding programs and other services, and the availability of funds will dictate the location of facilities and services. As a result, we anticipate acquisition, rehabilitation, and rental assistance for the homeless will more than likely occur in lower income areas within the City without concentrating projects in any one neighborhood.

E. LEAD AGENCIES

The City of Rockford Community Development Department will continue to coordinate and/or manage most, if not all, housing and publicly-funded economic development activities. In some instances, the Community Development Department will share its coordination with the Rockford Local Development Corporation on publicly/privately-funded economic development activities. Public Housing activities will continue to be the responsibility of the public housing authorities (Rockford Housing Authority and Winnebago County Housing Authority) home energy related activities including home weatherization and energy assistance along with social service activities will continue to be managed and coordinated by the City of Rockford's Human Service Department. They will also continue to assume the lead role in all homeless activities that in 2007.

In addition, the we will continue to partner with all housing non-profits and service providers, as well as neighborhood business district organizations and minority/female owned business organizations even if financial assistance from the City is not sought.

F. MONITORING STANDARDS AND PROCEDURES

The City of Rockford's Community Development Department is responsible for administering the Community Development Block Grant, HOME Investment Partnership and Emergency Shelter Grant funds received by the City of Rockford including the monitoring of activities funded with these grant dollars. Funds are used to assist to homeowners, investor-owners, businesses, sub-recipients and housing not-for-profits and are provided in the form of grants and/or loans. The grants and/or loans for housing related activities are provided for the purpose of rehabilitating properties, to persons acquiring and rehabilitating properties and to non-profits for the purpose of making improvements, which will benefit lower-income persons and/or limited clientele. Each has specific obligations to fulfill when in receipt of federal funds in support of their project and such obligations are clearly outlined in a written agreement or contract. The following are the policies and procedures the city will use to monitor compliance with contractual requirements and applicable regulations.

The City of Rockford will monitor its progress toward Consolidated Plan goals through the following process:

- ✓ Each homeowner or investor-owner project file in which funds may be committed will contain a check sheet to determine if it meets the definition of Section 215 goals (affordable housing) upon initial occupancy. For projects that actually result in assistance, records will be kept regarding the units affordability, data on income, age, race/ethnicity, family size and gender data on each household benefiting from the program in the file and at a centralized location for reporting purposes. Each file will also contain costs, methods of procurements, work items completed and volunteer hours, if utilized.
- ✓ Economic development activities will have individual project files, in which the eligibility, environmental review, financial underwriting, public benefit analysis, and approval documentation will be found. Each file will also contain project cost documentation, procurement information, Davis-Bacon documentation, and work item progress checklist.
- ✓ Internal goals and objectives, quarterly reports, and year-end accomplishment reports will be completed by each division of the Community Development Department responsible for meeting identified goals. The reports will be reviewed at regularly scheduled quarterly staff meetings and City Council Planning and Development Committee meetings. Accomplishments will be evaluated to determine whether the programs are being carried out in accordance with its goals, objectives and performance measurements in the Action Plan and in a timely manner. Productivity and program impact will be evaluated on a yearly basis.
- ✓ As required, a Consolidated Annual Performance and Evaluation Report (CAPER) will be completed and submitted to HUD annually by March 31st (90 days after end of program year) to document the progress made implementing Rockford's community development strategy.
- ✓ Accountability of recipients and their contractors will be insured through quality standards and performance/production guidelines as outlined in the agreements/contracts executed with each recipient of federal funds. In addition, all funds awarded, except Small Business Loan funds, will be held in an escrow account and disbursed only after proper invoicing to the City is presented and an inspection is made at the project site by City staff. The City shall also inspect each unit to determine if it meets local housing code, the housing quality standards established by HUD or the building code, prior to final payout and yearly throughout the term of the agreement or contract. The agreements/contracts will specify City and HUD requirements including affirmative marketing and fair housing requirements, Section 504 handicapped accessibility requirements, rules regarding lead based paint, housing quality standards through the attachment of itemized work item lists/ bids/proposals, procurement requirements, maintenance of insurance, Davis-Bacon, and other rules as they may apply. Also, through the execution of promissory notes and mortgages, other restrictions will be outlined such as, but not limited to, recapture

- restrictions, determinations of appropriate equity interest and third party rights, and those that will ensure continued affordability through long term mortgages with assumption clauses, as applicable. Title will be conveyed to those participating in the City's programs with specific terms and conditions.
- ✓ Occupancy and maintenance requirements will be instituted on several programs. Monitoring methods include: 1) requiring property owners to maintain property insurance in full force and effect with the City listed as loss payee. This ensures the City being notified if ownership changes and protects City investments, and 2) scheduling on-site and regular drive-by inspections.
 - ✓ Investor-owners that have received federal funds for the rehabilitation of rental units will also be required to submit annual responses to questionnaires regarding rents, tenant characteristics, and affirmative marketing procedures in order to determine compliance with program policies and procedures as stipulated in executed agreements, contracts, notes and mortgages.
 - ✓ All sub-recipients of federal funds, including projects awarded under the City's Community Assistance Program (CAP) and Emergency Shelter Grants Program, as well as Community Housing Development Organizations that receive either set aside dollars or project-based dollars will be required to submit monthly progress reports along with any requests for reimbursement of monthly expenses. These reports are reviewed to ensure that the activities associated with the expenditures are in line with the activities that were specified in the grant agreement with the sub-recipient. All such activities have been determined eligible prior to the execution of the grant agreement. Additionally, these progress reports will provide the basis for determining if specified goals and objectives of the Consolidated Plan are being met. They will contain information regarding the progress of the project as well as a statement concerning the boundaries of the area served by one project, and including the number of minority, low income and homeless persons served. Additionally, each report shall include a statement of whether the project has or has not met its initial objectives. A final report and annual reports for a specified period of time will also be required. The CAP reports must include a statement of final costs, a progress report as well as a statement concerning those served by the project, and any other information deemed necessary by the City. Each recipient will be required to have available all file documents, papers and records for inspection, audit and copying by the City of Rockford or HUD. Additionally, each sub-recipient will receive at least one on site visit by the monitoring and compliance staff during the term of its agreement. If reports are not received on a timely basis or if they are repeatedly inaccurate, then more frequent on site visits may be required.
 - ✓ The Mayors' Community Task Force on Homeless will meet monthly to review the homeless providers progress in serving the homeless, discuss problems, and identify gaps in services. They will also identify priorities for the following year and grant opportunities.

- ✓ The Rockford Housing Authority will continue to submit to the City of Rockford copies of reports and plans that they are required to submit to HUD for those programs it undertakes that are a necessary part of this Consolidated Plan.
- ✓ More clearly defined roles and improved cooperation has enabled federal grant fund draw downs to occur in a timelier manner thus decreasing the need to use local funds to carry out grant activities. As a result, the department is less likely to not reimburse the local dollars and thus more likely to expend grant dollars in a timely manner.
- ✓ Sub-recipient grant agreements call for monthly reimbursement of expenditures via expenditure reports. Sub-recipients are urged to submit monthly expenditure reports in a timely manner, usually before the fifteenth of the following month.
- ✓ Monitoring and Compliance staff works with Community Development's accounting staff to review grant disbursements monthly. This monthly review enables a more realistic projection of which, if any funds will probably need to be reprogrammed. A thorough evaluation of projects and activities is performed yearly prior to annual budget preparation. At this time, slow moving projects are evaluated to determine if funds should be reprogrammed to other line items. After appropriate reprogramming of activities then the budget is prepared.
- ✓ Lastly, the City of Rockford has been fully aware of HUD's requirements to institute Performance Measurements for all activities beginning October 1, 2006. As a result, the five-year goals and objectives that the city commonly develops for each Consolidated Planning period have been expanded to include inputs, outputs and outcomes. Additionally, performance measurement indicators have been instituted to provide a means to accurately measure the outcomes. These outcomes and objectives were actually very similar to those used when HUD established its outcome performance measurement framework. Consequently, it enabled the city to make a fairly painless transition into the new system. It should also be noted that the city will continue the practice of establishing one-year goals for each year of the five-year plan and objectives with specific activities are identified to determine how said goals will be met. The activities speak especially to projects and or units to be accomplished. The resources and or funding sources necessary to carry out each activity are specified as well. Progress towards meeting the goals established in the each year's annual plan is tracked quarterly via a quarterly report that is completed and submitted to City Council. In addition, the overall progress towards meeting the five-year goals is assessed. All of this provides a solid framework for completing each years Consolidated Annual Performance and Evaluation Report.

G. OTHER ACTIONS