

Section V. Strategic Plan

Overview

The purpose of the five-year strategic plan is to connect the needs identified in the preceding evaluation of primary and secondary research with long-range objectives for improving housing, providing an improved community, and furthering the economic development opportunities of households in Rockford with low to moderate income.

The development process for this Strategic Plan was guided by a series of strategy sessions with staff members from the City of Rockford. The sessions sought to sort community needs with the help of the primary and secondary research and the public input process, and to prepare longer term strategies designed to overcome those needs.

Primary Housing, Homeless, and Community Development Needs

Development of the Strategic Plan is based upon the needs identified during discussions with the public as well as through quantitative and qualitative research. These needs can be summarized as follows:

- The City of Rockford's economy underwent significant structural change over the last decade, with higher paying jobs leaving the community. A strong need exists to expand employment and increase the wage rates and income of the City's residents.
- With the restructuring of the City's industrial base, population growth occurred in an unbalanced fashion within the City boundaries, with population on the east side gaining and declining on the west side. Vacant buildings are proportionally more common on the west side; meanwhile, residential, commercial, and industrial development largely occurred on the eastern fringe of the City. The need to stabilize this imbalance is important for the long-term health of the entire community.
- The west side of the City of Rockford has fewer economic and housing advantages. The number of persons employed and living on the west side declined over the decade, and the comparatively high incidence of lower-priced and potentially dilapidated housing is problematic.
- Affordable housing for the City's population is available, except in the Northeast quadrant; however, an unsatisfactory portion of the City's housing is vacant, in need of rehabilitation, or unsuitable. Even though the City eliminated in excess of 100 dilapidated housing units per year for the last decade, both the quantitative and qualitative data, as well as the expressed opinions generated through the public involvement process acknowledge the condition of many residential sites, particularly on the west side, needs improvement or elimination.
- The City's population will become increasingly diverse as it continues its slow but steady overall increase. This growth in the population will require additional housing units. Whether the units are new construction or rehabilitation of currently vacant units, many of these units will be needed for low- to moderate-income households. Cost-effective enhancements must be sought

Principles Guiding the Strategic Plan

The City recognizes that to be successful in the implementation of housing and community development activities, efforts must be efficient and fruitful. Unfortunately, Rockford does not have sufficient resources either in its CDBG or HOME programs to properly address all of the specific needs of the City. The City therefore is utilizing several guiding principles for its five-year strategic plan. These principles are as follows:

- Concentrate efforts on a limited number of areas and activities, so expended resources will have the greatest lasting and noticeable effect;
- Support activities that build upon existing infrastructure, such as in-fill development or use of the current labor pool;
- Implement strategies with sustainable long-term impacts, such as cost-effective rehabilitation and new construction that complements surrounding properties;
- Seek opportunities to form partnerships with other agencies within the City, as well as outside of the City, generating beneficial activities for the larger economic region;
- Explore opportunities to leverage resources with other private, nonprofit, and government agencies so the City's limited resources have the greatest possible net effect.

Five-Year Objectives and Strategies

The three objectives the City will pursue over the next five years, based on the research and analysis covered in earlier sections of this report, are as follows:

1. Reduce housing blight and blighting influences in neighborhoods;
2. Increase the provision of affordable housing;
3. Create, expand, and retain employment in Rockford; and,
4. Reduce chronic homelessness by providing support to the Rockford/Winnebago/Boone County Continuum of Care.

Each of the objectives identified above, as well as the strategies consistent with each objective, are discussed in greater detail below.

Objective One: Reduce Housing Blight and Blighting Influences in Neighborhoods

Strategies:

1. Rehabilitate Suitable Homeowner Properties

Rehabilitation of existing homeowner properties is an important part of the overall improvement of Rockford's neighborhoods. Rehabilitation will enhance property values and reduce the number of unsuitable or dilapidated homes. The rehabilitation will follow the following steps:

- a) The City will establish standards, or criteria, that define housing that is economically feasible and suitable for rehabilitation and housing that is not suitable for rehabilitation. This will help ensure that the City of Rockford can more effectively utilize its housing resources and make incremental improvements focusing on the exterior and significant health and safety deficiencies in the interior of properties. Examples of these standards or criteria include:
 - i. Housing that is suitable for rehabilitation was constructed with higher quality materials and workmanship, and have architectural, historic, or aesthetic value;
 - ii. Housing that is not suitable for rehabilitation was constructed with inferior or lower quality materials and workmanship and has no architectural, historic, or aesthetic value.
- b) The City will target rehabilitation efforts in selected areas of the City, so that neighborhood improvements can be more readily reflected in the area's surrounding homes and neighborhoods.

2. Reduce Blighted Housing

A blighted area is defined as one in which conditions place serious physical or economic burdens on a community which cannot reasonably be expected to be reversed or alleviated by private enterprise acting alone. Blighted areas may be detrimental to the public health, safety, or welfare of the community, and they may be detrimental to the effective redevelopment of the area. A combination of many factors seems to have left the City of Rockford with a burdensome amount of blighted and dilapidated housing. By reducing blight through the following actions, the City will revitalize deteriorated neighborhoods and reduce low-income concentrations:

- a) The City will seek to identify housing that is unsuitable for rehabilitation and initiate efforts to acquire and eliminate such housing, whether through acquisition, condemnation, or other means; and,
- b) Once the housing is eliminated, the City will identify private residential owners interested in acquiring the land, expanding selected lot sizes in the City or using the lots for in-fill housing.

3. Promote New Construction for Infill Replacement of Housing

Although the City of Rockford's population is expanding slowly and some unsuitable housing must be eliminated, there remains a need to provide affordable new construction for homeownership. The new construction needs to be handled in a thoughtful manner that takes into consideration the issues of the entire community. Given these considerations, infill opportunities, including redevelopment activities, should be targeted, as follows:

- a) The City intends to identify possible infill projects; and,
- b) The City intends to review and, budget permitting, fund appropriate infill projects.

Objective Two: Increase the Provision of Affordable Housing

Strategy:

1. Increase Transitions From Low-Income Rentals to Homeownership

Homeownership is an important step in transitioning out of poverty. By helping persons in low-income rental situations access homeownership, the City will provide greater opportunity for low-income persons to accumulate equity and wealth.

- a) Increase minority homeownership in Rockford by using American Dream Downpayment Initiative funds and other available resources for first-time homebuyers; and,
- b) Enhance understanding and operation of the credit markets, particularly through homebuyer education classes.

Objective Three: Create, Expand, and Retain Employment

The City of Rockford has an abundant, capable workforce that unfortunately experienced significant job losses in recent years, particularly in the manufacturing sector. These recent problems can be overcome by focusing on the strengths of the workforce, attracting new business to the City, educating and retraining workers, and supporting and expanding current business in the City.

Strategies:

- 1. Expand and Retain Employment at Existing Businesses.** The City will take action by providing working capital, technical assistance, assistance with locating local employees, and/or aiding with special skills training.
- 2. Recruit New Businesses to the City.** The City will seek new business by targeting employers with needs matching the abilities of the City's workforce.

Objective Four: Reduce Chronic Homelessness

One of the nation's goals is to end chronic homelessness by 2012. The City, through its participation in the Rockford/Winnebago/Boone County Continuum of Care, is addressing the problem of chronic homelessness. A chronically homeless person is defined by HUD as an unaccompanied homeless individual with a disabling condition who has either been continuously homeless for a year or more, or has had at least four episodes of homelessness in the past three years.³⁹

Strategies:

1. Develop and Implement a 10-Year Plan to End Chronic Homelessness

Within the Continuum of Care (CoC) region 570 chronic homeless persons were identified in a 2003 point-in-time count, which provides a conservative estimate of the total population. Helping these persons, receive the assistance they need to make a successful transition into permanent housing is a priority that, once achieved, will likely result in greater resources and

³⁹ Notice of Funding Availability for the Collaborative Initiative to Help End Chronic Homelessness/Federal Register, Vol. 68, No. 17.

services for other homeless persons in need of assistance. The following actions will be taken by the CoC to end chronic homelessness:

- g) Identify all homeless resources and needs in the CoC;
- h) Determine the changes necessary to the current system to allow for rapid re-housing and appropriate services and intervention for those at risk of homelessness;
- i) Determine the appropriate approach to plan implementation;
- j) Engage CoC agencies in adopting the plan;
- k) Develop an outcomes instrument; and,
- l) Report results to the CoC and the community.

2. Encourage Collaboration and Cooperation Among Continuum of Care Agencies

The CoC's approach to ending homelessness depends upon collaboration and cooperation among many agencies. To assist the homeless in the transition to permanent housing, the CoC recognizes that collaboration between agencies is crucial, as no one agency has all of the necessary resources. Strategies for improving collaboration and cooperation among CoC agencies include the following:

- a) Strengthen the network of service providers who provide mental health, substance abuse, and physical health services to the chronically homeless;
- b) Continue to recruit new members into the CoC Task Force, including members of the homeless and formerly homeless community;
- c) Expand the Homeless Management Information System (HMIS). An HMIS was implemented in the CoC during 2003, and 11 agencies currently utilize the service. The HMIS improves the gathering of data concerning the homeless, providing more accurate and timely information. The HMIS also enables the CoC to identify services that result in positive outcomes for the homeless, and the system is expected to enhance inter-agency communication and consistency. With initial implementation completed, the emphasis now is on the following steps toward complete implementation of the HMIS across the CoC:
 - Identify the remaining agencies that should be included in the HMIS;
 - Enhance collaboration between agencies and the HMIS;
 - Deploy the HMIS at identified additional agencies; and,
 - Identify additional HMIS funding sources, and apply for funding as a unified, collaborative entity.
- d) Inform and educate collateral systems such as the judicial system about the chronically homeless population, and link their work with that of the CoC; and,
- e) Educate the public about the issue of ending homelessness.

Affordable Housing

HUD Table 2A, below, presents goals and the overall priority needs associated with renter, owner, and special needs households in the City. The number of households with unmet housing needs was determined with the use of 2000 HUD Special Tabulations. The total households shown in each category reflect the number of households with housing problems. A household with a housing problem is one where the household is experiencing one or more of the following conditions: overcrowding, a cost burden, or incomplete plumbing or kitchen facilities.

HUD Table 2A Priority Housing Needs					
PRIORITY HOUSING NEEDS (households)		Priority Need Level High, Medium, Low		Unmet Need	Goals
Renter	Small Related	0-30%	High	1,635	
		31-50%	Medium	989	
		51-80%	Medium	304	
	Large Related	0-30%	High	454	
		31-50%	Medium	290	
		51-80%	Medium	205	
	Elderly	0-30%	High	841	
		31-50%	Medium	480	
		51-80%	Medium	297	
	All Other	0-30%	High	1,488	
		31-50%	Medium	658	
		51-80%	Medium	288	
Owner	0-30%	High	1,796		
	31-50%	High	1,686		
	51-80%	High	2,113		
Special Needs		0-80%	High	28,460	
Total Goals					

The priority needs level for renters and owners with median incomes at 30 percent or less of the City median—in other words, those who are termed extremely low-income—is considered high. This is because extremely low-income households are most likely to be severely cost burdened and at greatest risk of eviction, homelessness, and related problems.

Homeowner households earning less than 80 percent of the City's median income are all considered a high priority for funding. This is because it is essential to the City's growth and prosperity that homeownership be maintained and strengthened. Those who own their homes but

are at risk because of their low incomes need to be a high priority so they can build their wealth and equity in the years to come.

The unmet need for special populations shown in the table is an aggregate of the needs identified for each population discussed in Section IV. The total provided is an estimate based on City and Winnebago County counts of the low- and extremely low-income elderly, persons with severe mental illness, the physically challenged, persons with alcohol or drug addictions, victims of domestic violence, and persons with HIV/AIDS and their families. Some overlap likely exists between the unmet needs for special needs populations and the needs listed for other populations.

Homeless Strategy

As discussed in Section IV, the most recent point-in-time count of the homeless found 1,441 homeless persons in the Continuum of Care (CoC), which includes Winnebago and Boone counties. Section IV also provides a list of facilities and services that assist homeless persons, homeless persons in families with children, and a variety of subpopulations.

Addressing the homelessness problem has been a goal in the City of Rockford for many years. The City's efforts were formalized in 1987, after a public hearing led to formation of the Mayor's Homeless Task Force. The current CoC system continues to address homelessness and related issues, with frequent success.

The 2004 CoC Application Summary provides more detailed discussion of the CoC's recent performance and activities aimed at ending homelessness.

Goals for Ending Homelessness. The CoC set specific goals for ending chronic homelessness, goals which will help to combat all forms of homelessness. The goals for 2004 are listed below:

1. Develop and implement the 10-Year Plan to End Chronic Homelessness;
2. Develop plans for assessing, treating, rehabilitating, and housing the chronically homeless;
3. Engage service providers to implement plans for serving the chronically homeless;
4. Establish outcome instrument to monitor progress;
5. Report on outcome results;
6. Expand HMIS; and,
7. Streamline resources.

Non-Housing Community Development

As noted in the previous section of this report, during the four public input meetings, an exit survey was distributed to gather additional data regarding how the public preferred the City's HOME and CDBG funding should be utilized. The survey instrument focused on five basic program activities: housing, economic development, infrastructure, public facilities, and human and public services, as each can be construed to be a qualifying activity.

Respondents were asked to indicate their most pressing needs in the City. Respondents were told that they had a new block of revenues and were asked how they might best use the funds. Responses associated with housing were presented earlier in this report. The following narrative presents the outcome of the other four, non-housing community development avenues. While it may not be practical to exactly follow this public input, as program guidelines define how funds are to be used, there is some flexibility in use of the funds and the exercise helps the City of Rockford receive guidance from stakeholders in the process.

The following is a review of how respondents to the exit survey felt about the importance of each program activity. Housing was to receive 29.35 percent of the resources, economic development 28.86 percent, human and public services another 17.97 percent, infrastructure 12.86 percent, public facilities some 8.08 percent, and 2.86 percent expressed for other purposes (chiefly education). Furthermore, respondents wanted 38.92 percent of the resources directed to the Southwest quadrant, 27.91 percent to the Northwest, 21.49 percent to the Southeast, and 11.69 percent to the Northeast.

Economic development was the second most important activity expressed by the respondents to the exit survey. As seen in Exhibit V.1, below, attracting, retaining, and expanding business commands more than fifty percent of the desired activities.

EXHIBIT V.1
EXPRESSED USES FOR ECONOMIC DEVELOPMENT FUNDS
CITY OF ROCKFORD: PUBLIC INPUT EXIT SURVEYS

20.9 %	Attract new businesses
20.3 %	Retain existing businesses
11.3 %	Expand existing businesses
9.9 %	Provide job training
9.5 %	Promote the City of Rockford
5.7 %	Provide job re-training
4.3 %	Enhance business infrastructure
4.2 %	Provide working capital for businesses
3.1 %	Provide businesses with technical assistance
2.7 %	Invest as equity partners
2.3 %	Provide venture capital
2.2 %	Develop business incubators
1.9 %	Develop business parks
1.4 %	Other:
.3 %	Build spec buildings

Respondents indicated that human and public services were next most important to receive attention from the City. Overall, the respondents indicated that expanding services for the youth was most important, with senior services and additional transportation issues next in importance. The allocation of resources from analysis of these surveys is presented in Exhibit V.2, on the following page.

EXHIBIT V.2
EXPRESSED USES FOR HUMAN AND
PUBLIC SERVICES FUNDS
CITY OF ROCKFORD: PUBLIC INPUT EXIT SURVEYS

21.4%	Expand services for youth
13.0%	Expand senior services
12.0%	Increase transportation services
11.1%	Health care services
10.7%	Childcare services
8.7 %	Services for those with substance abuse problems
8.2 %	Increase services for severely disabled
6.7 %	Fair housing counseling
6.5 %	Tenant/landlord counseling
1.7 %	Other:

The next most important activity for the allocation of funds was for the City's infrastructure. Here, improving local streets and roads was by far the most important activity for respondents to the survey. Other far less important issues were water and waste water systems, as seen in Exhibit V.3, below.

EXHIBIT V.3
EXPRESSED USES FOR INFRASTRUCTURE FUNDS
CITY OF ROCKFORD: PUBLIC INPUT EXIT SURVEYS

45.9%	Improve local streets and roads
13.2%	Improve local water systems
11.5%	Improve bridges
8.9%	Improve local solid waste facilities
7.6%	Improve local storm sewer systems
6.5%	Improve local wastewater systems
6.4%	Other:

Respondents to the survey also indicated preferences for public facilities for the City of Rockford. Exhibit V.4, below, presents the expressed uses of funds. Developing more youth and community centers comprised over 30 percent of the desired uses of funds.

EXHIBIT V.4
EXPRESSED USES FOR PUBLIC FACILITY FUNDS
CITY OF ROCKFORD: PUBLIC INPUT EXIT SURVEYS

17.2%	Develop more youth centers
16.1%	Develop more community centers
11.3%	Develop additional childcare facilities
10.9%	Develop more park and recreational centers
10.7%	Develop more senior centers
7.3 %	Develop more health facilities
6.1 %	Improve local police stations/ centers
5.4 %	Other:
5.0 %	Improve local fire stations
4.8 %	Improve public buildings for accessibility
2.9 %	Improve or expand jail space
2.3 %	Develop more residential treatment centers

Based upon the input received from the public input sessions, staff strategy sessions, and a set of strategic objectives and actions the City will undertake over the upcoming five-year period, HUD Table 2B, below, presents the City's priorities for promoting the City of Rockford as a viable urban community.

**HUD TABLE 2B
COMMUNITY DEVELOPMENT NEEDS**

PRIORITY COMMUNITY DEVELOPMENT NEEDS	Priority Need Level (High, Medium, Low, No Such Need)	Dollars to Address Unmet Priority Need
Economic Development Activities		
Attract new businesses	H	
Retain existing businesses	H	
Expand existing businesses	H	
Provide job training	H	
Promote the City of Rockford	H	
Provide job re-training	M	
Enhance business infrastructure	M	
Provide working capital for businesses	M	
Provide businesses with technical assistance	M	
Invest as equity partners	L	
Provide venture capital	L	
Develop business incubators	L	
Develop business parks	L	
Build spec buildings	L	
Human and Public Services		
Expand Services for youth	H	
Expand senior services	H	
Increase transportation services	H	
Health care services	H	
Child care services	H	
Services for those with substance abuse problems	M	
Increase services for severely disabled	M	
Fair housing counseling	M	
Tenant/landlord counseling	M	
Infrastructure		
Improve local streets and roads	H	
Improve local water systems	L	
Improve bridges	L	
Improve local solid waste facilities	L	
Improve local storm sewer systems	L	
Improve local wastewater systems	L	
Public Facilities		
Youth Centers	H	
Community Centers	H	
Childcare facilities	M	
Park and recreational centers	M	
Senior centers	M	
Health facilities	M	
Fire stations	L	
Improve accessibility of public buildings	L	
Expand jail space	L	
Residential treatment centers	L	
Planning		
System planning for City of Rockford	H	
TOTAL ESTIMATED DOLLARS NEEDED:		

Obstacles to Meeting Underserved Needs

Four primary obstacles exist to meeting underserved needs in the City of Rockford. These obstacles, discussed in detail below, are viable employment and job training, childcare, health care, and transportation.

Viable employment and job training. Traditionally, the Rockford area employment base exceeded the national average in manufacturing and industrial jobs. Jobs in this sector are unionized and provide higher than average wages and benefits. Manufacturing jobs declined in recent years, as major corporations merged and consolidated their workforces outside the United States and elsewhere in the country. Many of these jobs were replaced with service sector jobs. The quality of jobs in terms of wages and benefits declined, while the number of jobs paying living wages steadily decreased. This trend is expected to continue.

Policy changes in the Workforce Investment Act are expected to increase the amount of money available for job training. The large number of displaced industrial workers means budgeted funds are still not enough to provide adequate job training programs. The Rockford Public School System and Rock Valley Community College worked with local employers to create specialized training programs to increase the number of job-ready high school graduates. Illiteracy continues to be a major issue, as well as the high dropout rate among public school students.

Lack of affordable secondary education, a public four-year institution, and a vocational school limits the scope of education that can be obtained within the community. As a result, the ability of underemployed persons to obtain job skills and training is limited.

Childcare. Childcare with extended hours is needed for those working late and/or early shifts, especially single parents and those without family or alternative daycare support, or those with gaps in child support and/or childcare. There is a lack of affordable, quality childcare that enables employment to be maintained or obtained.

Health care. Many lower-income persons, especially single parents and Public Aid recipients, are failing to receive health care. Many persons have not had recent physicals, preventative shots and immunizations, or a usual care source. They have low or no levels of household insurance coverage. Financial reasons and the cost of care dominate the reasons for failure to receive care, as well as jobs without health care benefits and lack of Medicaid/Medicare. Even with insurance, certain medical payments and prescriptions still impact lower-income persons financially.

Transportation. Much of Rockford's growth and employment opportunities are along East State Street, East Riverside Boulevard, and North Perryville Road in Rockford's Northeast quadrant. The concentrations of lower-income households are primarily in the Southwest quadrant. Low and moderate-income persons who rely on the mass transit system have a difficult time accessing jobs, especially for those on late night or early morning shifts. Access to services, including health care and childcare, is also an issue.

Lead-Based Paint Hazards

Those at highest risk of the effects of lead-based paint poisoning are children, pregnant women and people working with lead in their jobs. The types of housing units more likely to have lead-based paint hazards include older units (lead-based paint used prior to 1950 is likely to contain higher concentrations), units in poor condition, units renovated or maintained not using safe work practices, and units with exterior lead-contaminated soil.

In Rockford, housing with lead-based paint hazards can be found in several ways. These include:

- Children are screened for high lead-blood levels as a part of school enrollment. If a high level of lead is shown, both a State of Illinois Public Health official and a nurse do an inspection of the premises. A common scenario is that younger siblings of a school-age child have higher blood-lead levels than the school-age child. After an inspection of the premises, action is taken to ensure compliance with health code regulations. The owner of the property is then responsible for either abatement or mitigation practices to eliminate or reduce the possibility of future lead poisoning from that unit.
- The City of Rockford, in its administration of its rehabilitation and homeownership programs, ensures that occupants, homeowners, and homebuyers are notified of the hazards of lead-based paint and that defective paint is identified and treated. If a child with an elevated blood level (EBL) is identified, additional steps are taken to inspect for lead-based hazards and stabilize, control, or abate.
- Federal law requires sellers and landlords to make a disclosure of possible lead-based paint hazards in units. Anytime a contractor does repair that creates an opening more than two feet in diameter, the contractor must inform the residents of possible lead-based paint hazard.

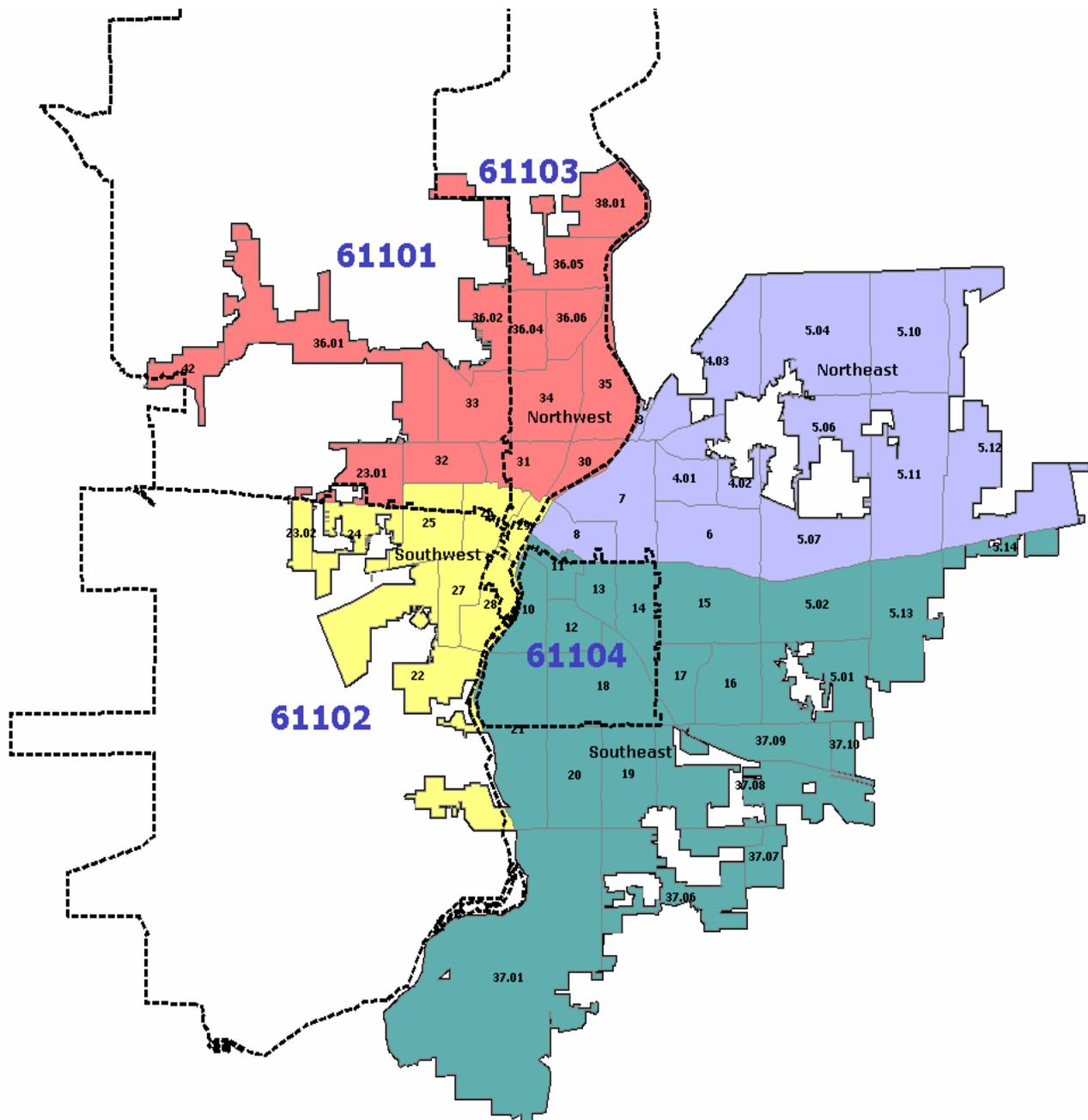
Lead Poisoning and Prevention Act. The State of Illinois has long recognized risks associated with lead-based paint. In fact, the Lead Poisoning and Prevention Act was passed into legislation in 1976, two years prior to elimination of lead compounds in the national paint stocks. The Act was last amended in August of 2000.

This Act calls for action once an incidence of elevated blood lead levels is reported, which usually occurs through blood lead level testing in children. For Rockford, the Winnebago Lead Inspector visits suspected sites and conducts inspections. The individual primarily looks for areas with friction, such as double-hung windows, or impact, such as doors or weather-sensitive areas on the exterior of the building. If a lead hazard is identified, the owner is cited and must take measures to mitigate or eliminate the hazard within 30 days. The typical abatement costs for a two-story rental house, comprising jamb liners and window wells, easily runs \$5,000.⁴⁰

The inspector also may elect to test homes in areas that the Illinois Department of Health determined to be likely areas of high risk. These are specified by zip code, and there are four zip codes pertinent to Rockford: 61101, 61102, 61103, and 61104. In general, these represent all of the west side of the City of Rockford and a portion of inner Southeast. Diagram V.1, on the following page, portrays these zip codes in relation to the City's quadrants and Census Tracts.

⁴⁰ Mr. James Hilliger, Winnebago County Lead Inspector, verbal conversation, May, 2004.

Diagram V.1
City of Rockford
 Zip Code Areas with High Lead Risks in Housing Units



Title X. On Sept. 15, 1999, HUD published a regulation entitled, “Requirements for Notification, Evaluation, and Reduction of Lead-Based Paint Hazards in Federally-Owned Residential Property and Housing Receiving Federal Assistance.” The purpose of this regulation is to protect young children from lead-based paint hazards in housing that is either receiving assistance from the federal government or is being sold by the government. The regulation

established procedures for evaluating whether a hazard may be present, controlling or eliminating the hazard, and notifying occupants of what was found and what was done in such housing. The City's housing rehabilitation programs became compliant with the regulation on Dec. 15, 2000.

Title X strengthens requirements for evaluation and reduction of lead-based paint hazards for all projects and activities receiving more than \$5,000 in federal funds. Acceptable lead levels in both structures and in children are lowered by 24 CFR 35. The following exemptions apply to the Rockford program: exclusive elderly housing; absence of lead-based paint; housing to be demolished; nonresidential property; rehabilitation disturbing little or no painted surfaces; emergency repairs and natural disasters; and emergency rental and foreclosure assistance. The new rule also provides levels of acceptable testing and abatement based on project costs.

HUD used four approaches in structuring the requirements in the regulation. The four approaches are as follows:

1. Do Not Harm is intended to allow low-cost repairs and other work to proceed without costly lead-based paint requirements, while at the same time preventing lead-based paint hazards from being created while work is being done. The process does not determine if a whole unit or property is "lead-safe" because clearance is conducted only for the work site.
2. Identify and Stabilize Deteriorated Paint provides assurance that lead-based paint has been stabilized and the unit is "lead safe" because clearance is conducted for the whole unit. It does not prevent the re-appearance of lead-based paint hazards.
3. Identify and Control Lead-Based Paint Hazards provides assurance that lead-based paint hazards have been eliminated. Clearance is conducted for the whole unit.
4. Identify and Abate Lead-Based Paint Hazards is used when federal funds are used to make a substantial investment in a property. Long-term hazard-control measures are implemented to help ensure that the unit remains lead-safe. This approach will primarily be used by the City of Rockford when substantial rehabilitation is necessary.

Strategies to Address Lead-Based Paint Hazards. The City will mitigate lead in 25 units per year over the next four years due to the award of a Get the Lead Out Grant.

Anti-Poverty Strategy

A number of barriers prevent very low-income households from overcoming poverty. These include health care costs, severe housing cost burdens, household problems, lack of employment or meaningful employment, lack of subsidized daycare, utility costs, prescription drug costs, transportation problems, the lack of formal education, lack of job training, and lack of specific skills training.

The City, in conjunction with other organizations, will undertake the following initiatives to reduce the number of households with incomes below the poverty level over the next five years:

- The Rockford Housing Authority (RHA), in conjunction with the City of Rockford and 20 support agencies, developed a three-phased program called the Family Self-Sufficiency

Program. The program helps public housing residents build self-esteem, improve relationships with their families, explore education and career opportunities and become potential homeowners.

- The Rock River Private Industry Council acts as the clearinghouse for all employers who would like to hire high school students and young adults. The Private Industry Council is highly experienced at running a vocational exploration program with classroom training for youths aged 14-17. Older participants, aged 18-21, work for nonprofit agencies. Additional funding will increase the number of opportunities available to these disadvantaged youth.
- Health care costs continue to be a national crisis, as well as within the Rockford community. The burden of costs associated with health care prohibit use by very low-income persons or cause very low-income persons to be financially strapped as a result of a family crisis or something as common as the birth of a child. The MOMS program has been successful in making subsidized health care more readily available to pregnant and parenting low-income mothers and their children. With the help of the mass transit district, accessible locations have been established to the program's target population. This project, along with the Kidcare program, should ensure that mothers and children have access to the basic checkups and immunizations necessary to ensure the child's physical health and development.
- The following were recurring issues identified by more than 200 human service professionals, community leaders, and representatives of various groups in the Health Communities Study. Activities/projects are expected to be identified that respond to these issues:
 1. Caring for our Children;
 2. Family Dysfunction;
 3. Healthy Well being;
 4. Housing;
 5. Neighborhoods;
 6. Racism Human Services Systems Issues: Staffing, System Effectiveness, Technology;
 7. Transportation; and,
 8. Welfare Reform.
- Crusader Clinic and Janet Wattles Center also provide subsidized health care services to lower-income persons. Services are provided at their main facility and at a number of satellite locations throughout the community.
- As previously discussed, the City's annual allocation of federal Emergency Shelter Grant funds are distributed to local homeless providers. The Emergency Food and Shelter Program now requires the second provision listed below, and that at least one homeless or formerly homeless person be a member of the local FEMA board. As a result of the Housing and Community Development Act of 1992, the agencies awarded funds through the Emergency Shelter Grant must ensure the following:
 1. The homeless will be given assistance in obtaining supportive services available in the community, such as those previously mentioned.

2. To the maximum extent practical, homeless individuals and families will be involved in constructing, renovating, and maintaining and operating facilities assisted under the program.
- Several of the housing nonprofits also provide work opportunities at housing construction sites either on their own initiative or through programs such as YouthBuild. Mentoring and employment opportunities are also provided by these nonprofits.
 - Many people of very low incomes have housing problems and try to make repairs with the little money they have or are forced to let the property deteriorate. The City has a program available to very low-income persons in which no repayment is necessary. Once a home is rehabilitated, utility and maintenance costs will decrease, resulting in a decreased cost burden and a greater residual income for the necessities in life. Although this program does not result in reducing the number of households with income below the poverty line, it does give people hope for a better future.
 - The integration of childcare into new rental and transitional housing developments has been considered and supported on several housing rehabilitation projects funded by the City and through the Community Assistance Program. Affordable and stable childcare gives parents the opportunity to find and keep employment.
 - The City's various economic development programs, both federally and locally funded, also seek to reduce or prevent poverty. The creation of jobs for low and moderate-income persons, especially those with the potential of advancement and/or those in basic industries, is a priority. In order to create jobs for those most in need, it will be necessary to create new businesses, expand existing businesses, and attract businesses seeking additional facilities. The City intends to assist such businesses by utilizing federal funds, local funds, state enterprise zone incentives, tax incentives, industrial revenue bond financing, and other resources deemed appropriate.
 - The City intends to preserve its existing housing stock when feasible. Although the City increased its level of demolition of substandard properties, it continues to focus primarily on the rehabilitation of properties. Inspections are conducted by qualified staff in making the final determination. To preserve the existing housing stock in Rockford, we also contact housing nonprofits and investor-owners to see if they have an interest in the property when properties are suitable for rehab but rehab is not feasible by the City for City purposes. To preserve the existing housing stock in Rockford, the City contacts housing nonprofits and investor-owners to identify interest in owning and rehabilitating the property. Often they have the capability to rehabilitate at lower cost because of donated labor and/or materials and sweat equity. The City also directs them to potential funding sources for the acquisition and/or rehabilitation of the property.
 - The Head Start Program teaches income eligible pre-school children educational skills and social classroom skills. Head Start gets children on the right track educationally as well as emotionally. While they're learning, their parents are provided access to employment and social services. Head Start serves over 500 children and families at three Rockford locations.
 - Through the Community Services Block Grant Program, there are several programs designed to assist people in moving out of poverty. The Small Business Loan Program provides loans to businesses that agree to create jobs for low-income persons. For every \$15,000.00 loaned, a job must be created that is filled by a low-income person. The CSBG Scholarship Program

provides scholarships to income eligible persons who are attending a formal education program or occupational training at an accredited Illinois institution.

- CDBG assists persons who are homeless or are in danger of becoming homeless through FEMA Emergency Food and Shelter funds and Rockford Township Condemnation funds. These funds assist low-income persons with one month's rent.
- The Illinois State Board of Education provides funding for the Summer Lunch program that the Community Services Division administers. This program provides free, nutritious lunches to eligible children aged 3-18 at various City locations.
- Community Services also provides linkage and advocacy to income-eligible households. This service increases awareness of community resources for low-income households as well as assisting the households in accessing these services.
- In addition, Community Services provides intensive, long-term case management services to families and seniors. The goal of the Family and Community Development Program is to assist families in increasing their skills, improving their income and strengthening family connections.
- The Low-Income Heating Energy Assistance Program (LIHEAP) assists income eligible households in paying their heating bills. This program affects low-income households, seniors, and disabled by making a one-time payment toward their heating bills. In addition, the LIHEAP Emergency Furnace Program assists income-eligible persons with the repair/replacement of furnaces. The Energy Division also offers the Weatherization Program, which assists households in making their homes more energy efficient in an effort to reduce heating costs.

Institutional Structure

Assessment of Strengths and Weaknesses. The primary strengths of the institutional structures are the relationships among the institutions already in existence, and the fact that these efforts are supported at the highest levels of institutions involved, both public and private.

The weaknesses, or gaps, in the institutional structure continue to exist in the following areas:

- Insufficient resources to meet needs at all levels, including housing, social services, and mental and physical care;
- A need to build upon the willingness of the local real estate and financial community to participate in programs that assist the very low end of the price range.

It is not perceived that these gaps could cause an individual or family to become homeless; however, gaps may become contributing factors in such an occurrence.

Strategy to Overcome Gaps. The City will continue to promote coordination in the identification of resources and implementation of programs to meet needs. This would provide a more efficient means of providing services and would reduce any overlap that may exist.

The City will continue its efforts to strengthen the existing nonprofits by providing technical resources and access to resources, while fostering the development of new resources to serve

specific areas and populations. The City will continue to promote coordination between local realtors and lenders to increase the effectiveness of service to low-income potential homeowners.

Reduction of Barriers. Overall barriers to affordable housing and homeownership will be addressed by the City through the continuation of programs such as the American Dream Downpayment Initiative, Homestead Partnership Program, the West Side Alive Program, the HELP Program, and the Assist Bond program.

Coordination

The City of Rockford, as a jurisdiction, will continue to promote intergovernmental and institutional structure cooperation in the delivery of housing services and programs throughout all sections (public, private, and nonprofit) and at all levels (City, state, and federal). The Community Development Department and the RHA will continue to be the key players in the coordination of housing service delivery.

With funding cuts to public housing authorities, intensified collaboration with the City is even more necessary. Staff members from the RHA and the Community Development Department will continue to communicate regularly regarding more effective ways of providing service. This coordination also exists with local governments of neighboring municipalities, as well as with state and federal agencies in association with or in management of various housing resources.

The overall coordination of housing-related activities is further strengthened by the development of key relationships among various organizations. One example is the Rockford Area Affordable Housing Coalition. This organization is primarily comprised of housing nonprofits and was formed to allow organizations associated with housing the opportunity to come together to coordinate the planning and development of strategies to improve Rockford's neighborhoods and to increase the availability of affordable, decent housing for lower-income people.

The Mayor's Community Task Force on the Homeless, comprised of local service agencies, mental health agencies, and housing officials, will continue to identify needs for emergency, transitional, and special needs permanent housing, seeking funding and operating programs to meet those needs.

All homeownership programs are assisted by the Rockford Homestead Board, staffed by the Community Development Department, and made up of volunteers with specific knowledge and expertise in some aspect of housing development. The Rockford Area Association of Realtors, through its Affordable Housing Committee, provides insight on how to better provide homeownership opportunities for lower-income people. The effort is further exemplified by the partnership between the National Association of Realtors and the U.S. Conference of Mayors.

Public Housing Resident Initiatives

The Family Self-Sufficiency Program helps motivated residents build self-sufficiency skills. Participants are urged to further their education in order to increase their earning potential and career options. A focus on homeownership motivates participants to become independent and begin planning to move to private sector housing. To prepare future homeowners, RHA, in

collaboration with the University of Illinois Extension, offers homeownership classes, while the Rockford Area Affordable Housing Coalition provides credit counseling. A new homeownership initiative, the Section 8 Choice Voucher Homeownership Program, allows Section 8 voucher holders to continue receiving a subsidy while purchasing a home.

RHA also works cooperatively with agencies and educational institutions to offer on-site services, educational opportunities, health services, recreational opportunities, and employment training for residents. Education and training are important steps toward self-sufficiency. Both Head Start and District 205 offer early childhood education programs and District 205 also provides tutoring for students in K-3. RHA's Universal Success Program, funded through Rock River Training, offers tutoring and mentoring for at-risk teens. In collaboration with Rock Valley College, a GED Program is offered at Blackhawk Family Development, with transportation provided by RHA.