

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The Consolidated Plan serves as a planning document meeting the federal government statutory requirements in 24 CFR 91.200-91.230, with revisions for preparing a Consolidated Plan and guiding the use of Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Housing Opportunities for Persons With AIDS (HOPWA), and Emergency Solutions Grant (ESG) funding based on applications to the U.S. Department of HUD. The major sections of the Consolidated Plan include a Housing Market Analysis, Housing and Homeless Needs Assessment, 5-year Strategic Plan, a 1-year Action Plan, and Consultation and Citizen Participation, with accompanying documentation relating to public comment. The Strategic Plan addresses specific needs that were identified in the data analysis, with specific goals and program targets for each category designated for funding. The Action Plan is a subset of the Strategic Plan, addressing funding options for the next fiscal year. The Consolidated Plan can be used by organizations in the community as a guide for identifying activities through which they can help the jurisdiction reach their housing and community development goals. The Consolidated Plan also serves as the baseline for measuring program effectiveness, as reported in the Consolidated Annual Performance and Evaluation Report (CAPER) required by HUD for each fiscal year's funding allocation. Incorporated into the Consolidated Plan are an analysis of the local housing market and a review of housing and homeless needs in Rockford as a means of defining the current environment in which federal funding is being used. The Consolidated Plan provides a strategic plan for meeting priority needs that were identified through the community participation process. The analytical parts of the document draw from the 2005-2009 and the 2008-2012 American Community Surveys and 2005 CHAS data provided by HUD. Other data sources include the 2010 U.S. Census and other information gathered locally, including the Rockford, Winnebago and Boone Counties Continuum of Care and a survey of citizens that was used to assist in prioritizing needs. The survey was available on the City's website and was distributed at community meetings at the time of the preparation of the Consolidated Plan. In preparing the Action Plan for 2019, the City of Rockford's Community and Economic Development Department provided information regarding CDBG and HOME, the City's Human Services Department provided information for

ESG, the Public Housing information was provided by the Rockford and Winnebago County Housing Authorities, and information on lead-based paint was provided by the Winnebago County Health Department.

PY2019 Rockford CARES Act Amendments:

The Coronavirus Aid, Relief, and Economic Security Act – CARES ACT (Public Law 116-136), signed by President Trump March 27, 2020, provided the City with \$2,279,029 Community Development Block Grant (CDBG)-CV, and \$1,794,268 Emergency Solutions Grant (ESG)-CV. Besides the maximum allowable administration expense, the City proposes to use CDBG-CV funds to address the economic impacts to businesses related to social distancing by expanding the City's Economic Development Microenterprise Loan Program. Uses of the ESG-CV funds are included as an attachment.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

This Annual Action Plan contains a range of goals, objectives, and outcomes formulated to address needs identified in the Consolidated Plan for homelessness, other special needs, affordable housing, non-housing community development, barriers to affordable housing, lead-based paint hazards, institutional structure, and coordination. These objectives include:

- Continue to collaborate with homeless providers to supply a continuum of services.
- Support services aimed at the homeless prevention and elimination of homelessness and Rapid Re-housing.
- Improve the condition of housing for low-income homeowners.
- Increase the viability for potential homeownership and rental housing opportunities.
- Increase accessibility for persons physically challenged and persons with disabilities to owner occupied and rental housing.
- Removal of slum and blighted conditions to either simply leave as green space or create marketable sites for new housing development and improve the physical condition and comply code violations for existing housing.
- Address community needs through community-based public service programs.
- Expand business opportunities by supporting economic development services and providing economic development assistance.
- Create marketable sites for new business development.

- Expand Small Business Technical Assistance Programs and access to financing.
- Expand and retain jobs and revitalize blighted and underutilized properties through direct assistance to private for-profit entities developing large-scale projects.
- Deconcentrate areas of high concentration of poverty and minorities, while improving those same areas through rehabilitation, demolition, and job creation/expansion.
- Continue to address vacancy and abandonment through demolition, homeowner assistance, code enforcement, and rehabilitation assistance. These objectives are supported by a collection of associated strategies and performance goals. These strategies seek to work toward meeting the objectives stated, addressing the need to stabilize Rockford's neighborhoods through the demolition of vacant and substandard property, code enforcement and rehabilitation. Also, to provide affordable housing, public facilities and infrastructure improvements, and public services. Specifics can be found in the Strategic Plan and Annual Action Plan.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The City of Rockford has a history of successful programs funded through the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG). Of particular importance to the health of the city have been programs that address the condition of the housing stock. The City has successfully funded housing rehabilitation activities targeting lower income and elderly households unable to properly maintain their homes, as well as managing a successful homebuyer program that assists new homebuyers. The City continues to address blight and vacant properties through code enforcement and demolition activities and leverages these programs with funds through the City's' General Funds and grants through the Illinois Housing Development Authority.

The City has worked actively with local homeless services providers to expand both the stock of units/beds available to homeless persons and services aimed at helping those persons find employment, housing, health care services, and educational opportunities. The city has increased its focus on permanent housing (mostly through increased permanent supportive housing and Rapid-rehousing) rather than temporary housing and has been able to work with landlords and tenants to increase the sustainability of the housing so that people do not fall back into homelessness.

Upon each year's completion, goals and strategies are re-assessed to ensure outcomes are meeting the needs of the target population. In addition, ongoing outreach allows target population to share perspectives. This assessment helps to evaluate program performance. Details of past performance can be found in the City's Consolidated Annual Performance and Evaluation Report (CAPER).

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

For the 2019 Action Plan, four public hearings were held. The first two hearings, one held at night and one during the day, identified 2018 program allocations, as well as an update of the 2018 CDBG, HOME and ESG projects and activities. The main purpose of the initial meetings was to provide an update to the community of current programs and gather public input regarding needs. The final two public hearings, also one held during the day and one in the evening, outlined the activities proposed for 2019. All meetings were accessible to persons with disabilities. Following the public hearings, citizens were provided a 30-day public comment period.

At the public hearings, generally citizens asked questions about how funding/programs worked. However, statements were made regarding the current conditions of rental and commercial properties. There were also marketing suggestions for the housing programs. Staff invited citizens to be actively involved in the consolidated planning process, which is scheduled to begin mid-2019. No comments were submitted to the City during the 30-day comment period.

PY2019 Rockford CARES Act Amendments:

For the Substantial Amendment to the 2019 Annual Action Plan, one virtual public hearing was held on Saturday, April 25, 2020, to explain how the City proposes to use CDBG-CV. Access to a video of the hearing along with a copy of the amendment, including the amended Citizen Participation Plan, comments, and comment responses were available daily on the City's website from Saturday, April 25th to Thursday, April 30th, the 5 day citizen comment period. In addition, a summary of the public hearing was available in Spanish. ESG-CV funds are not subject to consultation and the Citizen Participation Plan. However, the City is required to publish how ESG-CV funds will be used. The uses of ESG-CV were also made available on the City's website with the items mentioned above.

ESG-CV Round 2 funds are not subject to consultation and the Citizen Participation Plan. However, the City is required to publish how ESG-CV funds will be used. Therefore, ESG-CV Round 2 was posted on the City's website allowing for public comment from October 5, 2020 to October 9, 2020.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

See attachments for hearing comments.

PY2019 Rockford CARES Act Amendments:

Please see attachment for copies of the public comments that were received, as well as the City's written response. One comment requested CDBG-CV funding for the expected surge this summer and fall in housing stability needs. The City acknowledges the impact that COVID-19 has on household incomes and the likely increase in evictions and foreclosure proceedings after the moratorium periods end. The City has taken some initial steps to address housing stability needs related to the COVID-19 pandemic. The City's Human Services Department received over \$600,000 in additional ESG-CV funds, with the majority of the funds being allocated to homeless prevention rental assistance and rapid rehousing rental assistance. The City will continue to work with housing partners and stakeholders to monitor the changing environment and address issues through available resources. The City maintains its proposal to assist low-to-moderate income microenterprises, who have been unable to access existing financial relief programs. These microenterprises face permanent closure due to the impacts of COVID-19.

ESG-CV Round 2 was posted on the City's website allowing for public comment from October 5, 2020 to October 9, 2020. No comments were received. City Council approved the increase of funding on October 19, 2020.

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

All comments were accepted.

PY2019 Rockford CARES Act Amendments: All comments were accepted.

7. Summary

The 2015-2019 Consolidated Plan document was developed through a process that included a significant community engagement component, which included focus groups, workshops and a public review period, and was held in conjunction with the City of Rockford 2020 Comprehensive Plan process. The City of Rockford 2020 Comprehensive Plan provides a vision for the future of Rockford, focusing on city policies and strategies to guide the physical development of the City.

The 2019 Annual Action Plan was developed following the City's citizen participation plan. No comments were received from the public during that public review period, which is indicative of the extent to which community involvement was incorporated into the development of the Consolidated Plan.

City Council approval of the 2019 Annual Action Plan allows the City's Community & Economic Development Department to commit to all programs/activities without additional Council approval, with the exception of the following: proposed projects, programs, and activities that are outside an original program design and exceed more than \$25,000.

Any increases or decreases in CDBG and/or HOME funds will be applied to projects in need or slow moving, respectively.

Any Community Housing Development Organization operating dollars that are not requested or committed by the end of the calendar year will automatically be moved to a Single Family Housing project.

A substantial change invokes the citizen participation process and City Council approval. Substantial changes are those projects/activities not falling within the Annual Action Plan or changes totaling more than 30% of the total federal budget including program income.

Monetary movement within categories (Administration/Planning, Housing, Blight Removal, Economic Development, and Homeless Programs) can fluctuate within the category and not trigger a substantial change. The City's Citizen Participation Plan will be amended to correspond to these definitions.

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

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

Describe the agency/entity 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	ROCKFORD	Community and Economic Development Department
HOME Administrator	ROCKFORD	Community and Economic Development Department
ESG Administrator	ROCKFORD	Human Services Department

Table 1 – Responsible Agencies

Narrative (optional)

The lead agency for the development of the Annual Action Plan is the City of Rockford Community and Economic Development Department.

Consolidated Plan Public Contact Information

Deb Dorsey Housing and Program Manager

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

1. Introduction

In carrying out the programs and services required in the Consolidated Planning process, the City of Rockford consults with a wide variety of government departments, governmental agencies, and private and non-profit sectors to identify and address the extensive and varied housing, community development, and social service needs of our community. Through both formal and informal relationships and activities, Rockford has sought the participation and cooperation of all affected parties in developing the Consolidated Plan and this year's Action Plan. Ongoing relationships focused on specific needs and targeted meetings designed to bring public input into the Planning process are two of the ways that the City utilizes others in the consultation process. Through partnerships, limited resources are more efficiently utilized and gaps in the delivery of services are minimized.

Through the planning process, the City consults with entities such as social service agencies, health services, health care agencies, Continuum of Care, public housing authorities, community collaboration, private businesses, and community leaders. The following describes how government public and private agencies play a role in the planning process.

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))

The City's Community and Economic Development Department (CEDD) works closely with other departments on activities addressing low and moderate income persons and neighborhoods and leverages resources and fills additional gaps. These departments include, but are not limited to, the Legal, Public Works, and Finance Departments. The City has built strong partnerships with other local agencies to provide additional financial assistance when housing projects exceed program maximums. These programs can include the Winnebago County Health Department's Lead Program and the City's Weatherization program, run by the Human Services Department. Referrals are also made to such agencies such as HomeStart (a local HUD-certified housing counselor and NeighborWorks agency), RAMP, and Northwestern Illinois Area Agency on Aging as appropriate. The City also has an agreement with the Winnebago County Health Department for lead inspections. This serves as a means to coordinate staff resources, services to the public, and is another source for lead guidance. The City is also a member of a Housing Partnership Group, made up of various housing-related partners in the community, which meets regularly to discuss programs and issues to help address housing needs in the community. Providers who have served as Community Housing Development Organizations in the past will be certified

once projects come to fruition. Lastly, the City works with the Rockford Housing Authority and the Winnebago County Housing Authority who organize resources from the federal government to address the housing needs of the City's lowest income households.

Both Public and Assisted Housing providers are active members of the Continuum of Care, as well as Crusader Clinic, the federally funded community health center, and Rosecrance, the local mental health provider. Rockford Housing Authority already provides a homeless preference point and has agreed to work with the Continuum of Care to add additional points for homeless persons coming through the Single Point of Entry System. Winnebago County Housing Authority provides Moving On vouchers for people transitioning out of permanent supportive housing, FUP vouchers for youth that have aged out of foster care, and recently received Mainstream Section Vouchers for disabled, homeless persons who are working with the City and the Single Point of Entry.

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.

City staff works actively with the Rock River Homeless Coalition, the local umbrella for the development of the Continuum of Care. Staff participate in regularly scheduled meetings, hold a seat on the CoC Board, and facilitate the annual point-in-time count of the homeless. The City of Rockford provides technical assistance and administrative support to supplement Continuum of Care initiatives. The City is collaborating with the Rock River Homeless Coalition on the Built for Zero initiatives that address veteran, chronic, youth, and family homelessness. The City also provides technical assistance and distributes Emergency Solutions Grant funding to the various agencies that make up the membership of the Rock River Homeless Coalition. The City's Human Services Department also houses the Single Point of Entry for the homeless, which is the Coordinated Entry System for the Rock River Homeless Coalition. The department maintains all By-Name Lists of the homeless in the area, maintains a 24/7 "homeless hotline", and ensures that referrals are made to any CoC programs that have housing openings.

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

Staff from the City of Rockford have worked with the Rock River Homeless Coalition to develop performance standards and policies for ESG. This includes a policy on Rapid Rehousing Assistance, a policy on non-separation of families, and a domestic violence victim relocation policy, among

others. In addition, the CoC utilizes performance measures related to exits to permanent housing, spending history, and cost effectiveness as tools to review ESG applications for funding, as well as ESG recipient performance. The HMIS policies for the CoC fully meet HUD standards and are applicable to all funded ESG programs, except domestic violence partners and legal service providers who provide reports from comparable systems.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	HomeStart
	Agency/Group/Organization Type	Regional organization Business Leaders Neighborworks Chartered Member
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis 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?	Attended one or more public hearings regarding the City's 2019 Annual Action Plan.
2	Agency/Group/Organization	COMPREHENSIVE COMMUNITY SOLUTIONS INC
	Agency/Group/Organization Type	Services - Housing Services-Employment Regional organization Business Leaders Youthbuild - Non profit organization

	What section of the Plan was addressed by Consultation?	Economic Development 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?	Attended one or more public hearings regarding the City's 2019 Annual Action Plan.
3	Agency/Group/Organization	SWIFTT
	Agency/Group/Organization Type	Regional organization Planning organization Business Leaders Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended one or more public hearings regarding the City's 2019 Annual Action Plan.
4	Agency/Group/Organization	WINNEBAGO COUNTY HEALTH DEPARTMENT
	Agency/Group/Organization Type	Services-Health Other government - County
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted directly to assist with lead responses throughout this Annual Action Plan.

5	Agency/Group/Organization	Habitat for Humanity
	Agency/Group/Organization Type	Housing Services - Housing
	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?	Attended one or more public hearings regarding the City's 2019 Annual Action Plan.
6	Agency/Group/Organization	INSTITUTE FOR COMMUNITY ALLIANCES
	Agency/Group/Organization Type	Services-homeless Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended one or more public hearings regarding the City's 2019 Annual Action Plan.
7	Agency/Group/Organization	SHELTER CARE MINISTRIES, INC.
	Agency/Group/Organization Type	Services-homeless Services-Health

	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children 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?	Attended one or more public hearings regarding the City's 2019 Annual Action Plan.
8	Agency/Group/Organization	Transform Rockford
	Agency/Group/Organization Type	Business Leaders Civic Leaders Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development 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?	Attended one or more public hearings regarding the City's 2019 Annual Action Plan.
9	Agency/Group/Organization	West Gateway Coalition
	Agency/Group/Organization Type	Civic Leaders Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development 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?	Attended one or more public hearings regarding the City's 2019 Annual Action Plan.
10	Agency/Group/Organization	Midland States Bank
	Agency/Group/Organization Type	Regional organization Business Leaders Private Sector Banking / Financing
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended one or more public hearings regarding the City's 2019 Annual Action Plan.
11	Agency/Group/Organization	ROCKFORD HOUSING AUTHORITY
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Elderly Persons Services-Persons with Disabilities Other government - Local Business Leaders

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended one or more public hearings regarding the City's 2019 Annual Action Plan. Consulted directly to assist with public housing responses throughout this Annual Action Plan.
12	Agency/Group/Organization	Rockford Township
	Agency/Group/Organization Type	Other government - Local Business Leaders
	What section of the Plan was addressed by Consultation?	Economic Development 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?	Attended one or more public hearings regarding the City's 2019 Annual Action Plan.
13	Agency/Group/Organization	Keith Creek Neighborhood Association
	Agency/Group/Organization Type	Civic Leaders Neighborhood Organization

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended one or more public hearings regarding the City's 2019 Annual Action Plan.
14	Agency/Group/Organization	Rosecrance
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended one or more public hearings regarding the City's 2019 Annual Action Plan.
15	Agency/Group/Organization	Rock River Homeless Coalition
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended one or more public hearings regarding the City's 2019 Annual Action Plan.
16	Agency/Group/Organization	River District Association
	Agency/Group/Organization Type	Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Market Analysis Economic Development

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended one or more public hearings regarding the City's 2019 Annual Action Plan.
17	Agency/Group/Organization	Southwest Rockford CDC
	Agency/Group/Organization Type	Housing Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended one or more public hearings regarding the City's 2019 Annual Action Plan.
18	Agency/Group/Organization	Signal Hill Neighborhood Association
	Agency/Group/Organization Type	Civic Leaders Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended one or more public hearings regarding the City's 2019 Annual Action Plan.
19	Agency/Group/Organization	THE CARPENTER'S PLACE
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended one or more public hearings regarding the City's 2019 Annual Action Plan.
20	Agency/Group/Organization	The Workforce Connection
	Agency/Group/Organization Type	Business Leaders
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended one or more public hearings regarding the City's 2019 Annual Action Plan.
21	Agency/Group/Organization	Rockford Rescue Mission
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended one or more public hearings regarding the City's 2019 Annual Action Plan.
22	Agency/Group/Organization	Winnebago County Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted directly to assist with public housing responses throughout this Annual Action Plan.

23	Agency/Group/Organization	Office of Congressman Cheri Bustos
	Agency/Group/Organization Type	Other government - Federal
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development 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?	Attended one or more public hearings regarding the City's 2019 Annual Action Plan.

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

No specific organizations were intentionally left out of the public participation process.

The City meets with housing and service providers/partners not only during the annual plan process, but also throughout the year.

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	Rock River Homeless Coalition	The Strategic Plan provides a set of goals for addressing homelessness, which are supported by the Rock River Homeless Coalition and its participating agencies.
PHA 5-Year Plan	Rockford Housing Authority	The 5-Year Plan addresses specific maintenance and planning needs of the Rockford Housing Authority, which has a major role in addressing the housing needs of Rockford. Also within this plan, are extensive measures to resident education and employment training.
Fair Housing Equity Assessment	Rockford Metropolitan Agency for Planning	The Regional Analysis of Impediments to Fair Housing was used a resource to identify housing needs. Some of the strategies address impediments identified in the assessment. This will be updated as part of the 2020-2024 Consolidated Plan process.
2020 Comprehensive Plan Update	City of Rockford	See narrative below for more details.
Center for Community Progress	City of Rockford	The City received technical assistance to provide guidance on how to build capacity and inform strategic approaches to problem properties, as well as understand and implement new approaches. The name of the plan is Center for Community Progress - Laying the Foundation: Developing an Improved Approach to Problem Properties in Rockford.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 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

As required by Department of Housing and Urban Development (HUD), the City has a Citizen Participation Plan (CPP) to ensure citizens have an opportunity to participate in the advisory role in planning, implementing, and assessing Community Development Programs (CDP). All meetings are accessible to persons with disabilities and translators are provided upon request.

A minimum of two public hearings and a 30-day comment period occurs prior to obtaining City Council approval of the Annual Action Plan (AAP). At the first hearing, staff reviews the proceeding year's CDP accomplishments and gains input on what activities should cease, be continued or new ones to be proposed. At the second hearing, staff provides a plan of activities for the new program year taking into account the input from the first hearing. For this AAP, four hearings took place; two for reviewing proceeding year's accomplishments (one held during day and one during evening, both in different quadrants of the City) and 2 hearings to review the plans for the new program year (one held during day and one during evening, both in different quadrants of the City). Generally citizens asked questions about how funding/programs worked. However, statements were made regarding the current conditions of rental and commercial properties. There were also marketing suggestions for the housing programs. Staff invited citizens to be actively involved in the consolidated planning process, which is scheduled to begin mid-2019.

According to the CPP, the City publishes a notice for a hearing in the local newspaper at least 3 days prior to the hearing. For this AAP, the notice for the first set of hearings held on September 26, 2018 was published September 19, 2018. The notice for the second set of hearings held on October 24 and 25, 2018 was published on October 17, 2018. As the City's plan required, the notice contained the date, time, location, and topics to be discussed. In addition, Continuum of Care (CoC) providers, businesses, developers, nonprofit organizations, and philanthropic organizations serving low-and moderate-income persons, neighborhoods, minorities, public housing residents were directly notified, and the City used social media and media releases to distribute hearing details.

A notice of availability of a proposed plan for public review and comment was published in the local newspaper allowing for a 30-day comment period on October 30, 2018. AAP copies were made available at 223 S Winnebago, a Rockford Housing Authority site, at all Rockford Public Library branch locations, at the City Community & Economic Development Department, and on the City's website. No additional comments were submitted during the 30-day comment period.

The City will provide a notice and a comment period for any substantial amendments to the AAP. Substantial amendments include projects not falling with the AAP or changes totaling more than 30% of the total federal budget including program income. Monetary movement within categories (Administration/Planning, Housing, Blight Removal, Economic Development, and Homeless Programs) can fluctuate with the category and not trigger a substantial change.

For the Consolidated Annual Performance and Evaluation Report (CAPER) evaluating the City's accomplishments for this AAP, the City will provide notice in a local newspaper allowing for a 15-day comment period. The City will complete and submit the 2019 CAPER during 1st quarter 2020.

The budget did not substantially change, based on comments received during the public hearings. However, minor changes were necessary due to actual grant allocations. The City informed citizens at the public hearings that any increases or decreases in CDBG and/or HOME funds would be applied to projects that are in need or slow moving, respectively.

PY2019 Rockford CARES Act Amendments:

The CARES Act included suspensions and waivers to CPD funding to establish and implement expedited procedures. They allowed for reasonable notices, 5-day public comment periods, virtual Public Hearings, and for the City to complete a Substantial Amendment and revise their Citizen Participation Plan concurrently. COVID-19 related costs are eligible for CDBG-CV and ESG-CV if they were eligible for CDBG and ESG regardless of the date of expenditure. **ESG-CV funds are not subject to consultation and the City's Citizen Participation Plan, as long as the intended use of the ESG-CV funds are public.** In addition, the HUD Secretary was authorized to provide additional waivers as necessary for 2019, 2020 and CPD funds, including CDBG, ESG, and HOME.

One virtual public hearing was held on Saturday, April 25, 2020 to explain how the City proposes to use CDBG-CV. **Access to a recorded video of the hearing, along with a copy of the amendment, including the amended Citizen Participation Plan, comments, and comment responses, was**

available on the City's website from Saturday, April 25th to Thursday, April 30th, the 5 day citizen comment period. In addition, a summary of the public hearing was available in Spanish. The uses of ESG-CV was also made available on the City's website.

ESG-CV round 2 was posted on the City website allowing public comment October 5, 2020 to October 9, 2020. No comments were received. City Council approved the increase of funding October 19, 2020.

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	Public Hearing	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Agency Representatives	Two public hearings were held on September 26, 2018, one on October 24, 2018, and one on October 25, 2018. 44 people attended the public hearings. The public comment period was from October 30 to November 29, 2018.	Minutes documenting comments from the public hearings are included in the attachments.	All comments were accepted.	

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)
2	Virtual Hearing: PY2019 Rockford CARES Act Amendment	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non- targeted/broad community Residents of Public and Assisted Housing	One virtual public hearing was held on April 25, 2020. Access to pertinent information was available daily on the City's website.	Comments from the public hearing are included in the attachments.	All comments were accepted.	
3	Internet Outreach: ESG-CV Round 2	Non- targeted/broad community	NA	No comments received	NA	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City of Rockford receives funding from three federal grant programs, the Community Development Block Grant (CDBG) Program, the HOME Investment Partnerships Program (HOME), and the Emergency Solutions Grant (ESG). This fifth and final year of the 2015-2019 Consolidated Plan will provide the City a combined total of \$3,241,972 (includes program income of \$64,216) in resources to support affordable housing, homeless, and community development programs and projects. Generally each year, the City has "Prior Year Resources" available to expend until the new award is available; anticipated availability is 2019 mid-year. The funding remaining at the end of the Consolidated Plan will be expended in future years.

According to 24 CFR Part 570.902, the City is considered timely for obligating CDBG funds if by November 1, 2019, the amount of CDBG funds available to the City under grant agreements but undisbursed by the U.S. Treasury is less than \$3,152,022 (1.5 times the CDBG grant amount for 2019). Current obligation deadlines for HOME have been removed. However, there are expenditure deadlines. The City must expend all FY2012 funds by December 31, 2019. To date, the City has expended FY2012, FY2013, and FY2014 HOME funds. For ESG, all funds except administrative costs must be obligated within 180 days after the date that HUD signs the grant agreement.

PY 2019 Rockford CARES Act Amendments:

The Coronavirus Aid, Relief, and Economic Security Act – CARES ACT (Public Law 116-136), signed by President Trump March 27, 2020, provided the City with \$2,279,029 Community Development Block Grant (CDBG)-CV Rounds 1 and 3, and \$1,794,268 Emergency Solutions Grant (ESG)-CV

Rounds 1 and 2.

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	2,101,348	26,000	0	2,127,348	0	"Expected Amount Available Remainder of Con Plan" is \$0 because 2019 is the final year of the 2015-2019 Consolidated Plan. However, the City expects to have FY2019 available at year end. 1.2 times the 2019 CDBG Allocation, the same percentage remaining 12/31/2018, is \$2,521,618.

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	895,627	38,216	0	933,843	0	"Expected Amount Available Remainder of Con Plan" is \$0 because 2019 is the final year of the 2015-2019 Consolidated Plan. However, the City expects to have HOME funds available at year end. The last 5 year average of funding available at year end is \$1,043,429. \$513,339 of the anticipated available balance is CHDO Reserves, the required 15% set aside for Community Housing Development Organization developments.

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: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	180,781	0	0	180,781	0	"Expected Amount Available Remainder of Con Plan" is \$0 because 2019 is the final year of the 2015-2019 Consolidated Plan. Generally the prior year award is obligated within the 1st quarter of the year. Therefore, \$180,781 will be available to commit at 2019 year end.

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: \$		
Section 108	public - federal	Economic Development	7,451,740	0	0	7,451,740	0	"Amount Expected for the remainder of the Consolidated Plan" is zero because 2019 is the final year for the 2015-2019 Consolidated Plan. However, it is anticipated that the City may have Section 108 available at year-end. For the City to use Section 108, the City would need to pledge its current and future CDBG allocations to an eligible activity as the principal security for a loan guarantee.
Other	public - federal	Other	4,073,297	0	0	4,073,297	0	CDBG-CV and ESG-CV funds to be used to prevent, prepare for, and respond to Coronavirus.

Table 5 - 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

The City of Rockford works with developers, lenders, and housing providers to identify any potential sources of leverage and program match for its housing and economic development programs. The City has received Illinois Housing Development Authority (IHDA) funds through its Blight Reduction Program (BRP) and Abandoned Property Program (APP). These funds leverage the City's demolition program, which includes funding sources through CDBG and the City's general fund. In addition, the City's non-profit partner, Rockford Corridor Improvements (RCI), has provided funds for demolitions. Generally, the City's homebuyer programs leverage private first mortgage lender financing, other down payment assistance (such as Illinois Housing Development Authority, Federal Home Loan Bank of Chicago (FHLBC), and local Lenders), closing credits, and

owner contributions. The City's owner occupied housing rehabilitation program leverages other local housing programs administered through organizations such as the Winnebago County Health Department and the City of Rockford Human Services Department. Community Housing and Development Organization (CHDO) developments leverage financing such as traditional bank financing, State of Illinois Low Income Housing Tax Credits, FHLBC competitive grants, utility grants, and other non-traditional creative opportunities.

In order to ensure that matching requirements for the HOME program are satisfied, the City of Rockford has maintained a HOME match log since the inception of the HOME program. This log documents specific projects and identifies the date and amount of HOME dollars expended, the amount of match liability incurred, the value of a match contribution, the type of match and the date that it was recognized. The log maintains a running tally of recognized match contributions and allows the banking of match in excess of the required amounts associated with yearly disbursements. Such yearly disbursements are captured in the IDIS PR33 report and compared against the match log to ensure that ample match is available to satisfy the required amount each year.

As part of the qualification process for the Economic Development Facade or Rehab and Development Assistance programs, applicants are required to demonstrate their ability to match 50% of the project costs up to \$25,000. This may be satisfied through private loans, personal equity, external grants, or other means.

All sub-grantees receiving ESG funds are required to provide qualified matching funds. The Human Services Department uses Community Services Block Grant funding to leverage their homeless funding.

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

The City funds a demolition program aimed at reducing conditions of slum and blight in neighborhoods throughout the community. There is no intent to acquire properties because of this program unless the acquisition best serves the neighborhood. The City also funds a homebuyer assistance program that is eligible for 1-4 family residential properties anywhere in the City limits. The City will work with non-profit housing providers and CHDOs to redirect vacant lots created by the demolition program for use for affordable housing and with adjacent property owners to acquire as a side-lot. In early 2019, the City of Rockford signed an intergovernmental agreement with Belvidere, Winnebago, and Boone Counties to establish the Northern Illinois Land Bank Authority. Initial start-up costs for the creation of a regional land bank was provided through a technical assistance grant through IHDA. The new Land Bank will enhance the City of Rockford's efforts in addressing vacant and blighted properties, in addition to providing more effective and efficient procedures for returning properties to beneficial private or public uses.

Discussion

The City has programmed approximately \$3.2 million from the CDBG, HOME, ESG programs, and approximately \$4 million from CARES Act funding for the FY 2019 program year. This sum includes the annual allocation amounts, and anticipated program income. The City will also be utilizing prior year CDBG, HOME, and ESG funds to manage previous year programs. These funds will be used to operate a range of private and public services as described later in the Annual Action Plan.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeless Objective 1.1	2015	2019	Homeless	City Wide	Emergency Shelter - Facilities Emergency Shelter Operations/Essential Services HMIS Transitional Housing Facilities	ESG: \$80,500	Other: 3 Other
2	Homeless Objective 2.1	2015	2019	Homeless	City Wide	Homeless Prevention Rapid Re-Housing	ESG: \$57,873 ESG-CV: \$1,510,524	Tenant-based rental assistance / Rapid Rehousing; 300 Households Assisted Other: 2 Other
3	Homeless Objective 2.2	2015	2019	Homeless	City Wide	Emergency Shelter Operations/Essential Services Rapid Re-Housing	ESG-CV: \$28,497	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Homeless Objective 2.3	2015	2019	Homeless	City Wide	Emergency Shelter Operations/Essential Services HMIS	ESG: \$29,000 ESG-CV: \$133,700	Other: 1 Other
5	Affordable Housing Objective 1.1	2015	2019	Affordable Housing	City Wide CDBG Eligible Areas	Major Home Improvement Minor Home Improvements	CDBG: \$481,768 HOME: \$454,755	Homeowner Housing Rehabilitated: 47 Household Housing Unit
6	Affordable Housing Objective 1.2	2015	2019	Affordable Housing	City Wide	Homeownership Assistance Major Home Improvement Minor Home Improvements	HOME: \$76,057	Direct Financial Assistance to Homebuyers: 5 Households Assisted
7	Affordable Housing Objective 2.1	2015	2019	Affordable Housing	City Wide	Affordable Housing Development/Owner and Rental Major Home Improvement Minor Home Improvements	HOME: \$44,781	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Affordable Housing Objective 2.2	2015	2019	Affordable Housing	City Wide	Affordable Housing Development/Owner and Rental Major Home Improvement Minor Home Improvements	HOME: \$134,344	Direct Financial Assistance to Homebuyers: 1 Households Assisted
10	Non-Housing Community Development Objective 1.1	2015	2019	Non-Housing Community Development	City Wide	Demolition	CDBG: \$484,087	Buildings Demolished: 38 Buildings
11	Non-Housing Community Development Objective 1.2	2015	2019	Non-Housing Community Development	CDBG Eligible Areas	Code Enforcement	CDBG: \$140,158	Housing Code Enforcement/Foreclosed Property Care: 2600 Household Housing Unit
16	Non-Housing Community Development Objective 3.3	2015	2019	Non-Housing Community Development	City Wide CDBG Eligible Areas	Commercial Corridor Revitalization, Incentives Technical Assistance to Small Business/Incubators	CDBG: \$67,526	Businesses assisted: 1 Businesses Assisted
17	Non-Housing Community Development Objective 3.4	2015	2019	Non-Housing Community Development	City Wide CDBG Eligible Areas	Commercial Corridor Revitalization, Incentives Creation and Retention of Jobs	CDBG: \$140,286 CDBG-CV: \$1,823,224	Businesses assisted: 72 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
18	Non-Housing Community Development Objective 3.5	2015	2019	Non-Housing Community Development	City Wide	Commercial Corridor Revitalization, Incentives Creation and Retention of Jobs	CDBG: \$75,000	Facade treatment/business building rehabilitation: 3 Business

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Homeless Objective 1.1
	Goal Description	Provide ESG funds for Shelter services including essential services, operations, rehab, and renovation.
2	Goal Name	Homeless Objective 2.1
	Goal Description	Provide ESG funds to avert eviction and/or utility disconnection, as well as pay deposits and rent and to provide for rapid rehousing of those persons becoming homeless.
3	Goal Name	Homeless Objective 2.2
	Goal Description	Provide ESG funds for Essential Services and Street Outreach to persons currently homeless or at risk of becoming homeless.
4	Goal Name	Homeless Objective 2.3
	Goal Description	Provide ESG funds to support nonprofit organizations with HMIS data entry costs, as well as support Coordinated Entry.

5	Goal Name	Affordable Housing Objective 1.1
	Goal Description	Provide Major and Minor Rehabilitation and Reconstruction funding to homeowners with repair needs.
6	Goal Name	Affordable Housing Objective 1.2
	Goal Description	Provide acquisition and Homeowner Rehabilitation Funding to homebuyers purchasing homes to live in as their primary residence.
7	Goal Name	Affordable Housing Objective 2.1
	Goal Description	Provide funding to CHDO organization for operating funds to develop affordable housing for low-moderate income homeownership and rental housing.
8	Goal Name	Affordable Housing Objective 2.2
	Goal Description	Provide funding for development and rehabilitation of affordable housing for low-moderate income homeownership and rental housing.
10	Goal Name	Non-Housing Community Development Objective 1.1
	Goal Description	Demolition and property clearance of slum and blighted conditions.
11	Goal Name	Non-Housing Community Development Objective 1.2
	Goal Description	Code Enforcement salaries and overhead associated with the enforcement of state and local codes within CDBG Code Enforcement area.
16	Goal Name	Non-Housing Community Development Objective 3.3
	Goal Description	Section 108 Loan Debt Service - CDBG funds allocated to provide funds for stand-by cash infusion to support debt service payments.

17	Goal Name	Non-Housing Community Development Objective 3.4
	Goal Description	Rehabilitation and Development Assistance - CDBG funds allocated to provide assistance to Commercial and Industrial businesses or developers making investment that serve CDBG eligible areas, create or retain permanent jobs for low/moderate income persons (80% or below the median income) or that are microenterprise businesses with a low/moderate income owner.
18	Goal Name	Non-Housing Community Development Objective 3.5
	Goal Description	Façade Improvement Assistance Program - CDBG funds allocated to provide assistance to Commercial and Industrial businesses or developers making façade improvement investment within CDBG eligible areas and or creating or retaining permanent jobs for low/moderate income persons (80% or below the median income), and low/moderate income microenterprise business owners.

Projects

AP-35 Projects – 91.220(d)

Introduction

The following projects were developed by staff with consultation from non-profit service providers and community input.

Projects

#	Project Name
1	Administration/Planning
2	Rehabilitation Operations
3	Single Family (1-4 units) Housing
4	Homebuyer Assistance
5	Homebuyer and Rental CHDO
6	CHDO Operating
7	Demolition
8	Code Enforcement
9	CDBG Housing Rehabilitation
10	Facade Improvement Assistance Program
11	Rehabilitation & Development Assistance (Economic Development)
12	Stand-by Section 108 Loan Debt Service
13	2019 ESG
14	CV-Economic Development
15	ESG20 Rockford

Table 7 - Project Information

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

The projects listed were selected from the total of project proposals received in accordance with their consistency with the priorities established through the Consolidated Plan forums and community survey process. These projects meet the needs specified in the Needs Assessment and prioritization process, to the extent that funding was available. Organizational competencies were also considered when selecting one project over another, leaning toward those organizations with long-standing histories of successful project management. The City has multiple competing priorities with limited available funding. The City would like to preserve the ability to respond to all high priority needs in the community as identified by data analysis and community participation, but with decreasing allocations, this is not possible. The programs for 2019 described in this Plan are based on need, take into consideration our available resources – both staff and monetary – and consider our ability to leverage other private resources. Staff's skill level and experience in running these types of program was also considered.

78% of the City's housing stock was built in 1979 or prior, and there is a tremendous need in the community to address blighted properties, as well as provide financial assistance for housing rehabilitation programs. As a result, the City is initiating a new housing rehabilitation program supported by CDBG funds and targeted within four 2019 CDBG Code Enforcement areas. This program will help low-moderate income homeowners to address specific code violations on their single-family homes. The City is currently engaging other housing partners and financial institutions to leverage additional resources in these areas.

As part of the environmental review process for all federally-funded projects, the Illinois Historic Preservation Agency (IHPA) must review all properties per Section 106 of the National Historic Preservation Act of 1966, as amended. Recent reviews by IHPA have identified some housing rehabilitation projects as "contributing structures to potential historic districts" even though they are not located in current local or national historic districts. The properties are not identified as "historic" at the time of the initial assessment, so when historic standards are required for the rehabilitation, the work item list must be re-evaluated prior to obtaining bids. The materials required to meet the state's historic standards are usually more expensive and may need to be custom-ordered (e.g., wood windows instead of vinyl). This causes a delay in the project evaluation process and ultimately an increase in the overall project cost. In some cases, although we continue to look for efficiencies, the cost to bring the property up to local code within the historic standards can far exceed the program maximums. The rehabilitation program maximum is determined by the City by evaluating the average value of the properties that require rehabilitation and the amount of available federal funds, with a goal of maximizing the program impact in the community. Although the goal is to help every applicant, the City does not believe it is realistic to raise the program maximum at this time, based on the cost-benefit threshold. The City collaborates with other local housing programs to leverage resources on projects whenever possible. However, in cases where the City cannot provide the financial assistance required to meet the historic and code requirements, the properties may continue to fall into disrepair, causing additional blight in

neighborhoods, and increasing health and safety concerns for the neighborhoods. It remains an ongoing challenge to meet historic standards in low-income neighborhoods that are experiencing blight, and the City continues to work with its partners to help as many homeowners as possible to rehabilitate their homes.

AP-38 Project Summary

Project Summary Information

1	Project Name	Administration/Planning
	Target Area	City Wide
	Goals Supported	Affordable Housing Objective 1.1 Affordable Housing Objective 1.2 Affordable Housing Objective 2.1 Affordable Housing Objective 2.2 Non-Housing Community Development Objective 1.1 Non-Housing Community Development Objective 1.2 Non-Housing Community Development Objective 3.3 Non-Housing Community Development Objective 3.4 Non-Housing Community Development Objective 3.5
	Needs Addressed	Code Enforcement Demolition Major Home Improvement Minor Home Improvements Affordable Housing Development/Owner and Rental Homeownership Assistance Creation and Retention of Jobs

	Funding	CDBG: \$313,825 HOME: \$223,906 CDBG-CV: \$455,805
	Description	Provides for reasonable program administration costs and carrying charges related to the planning and execution of community development activities assisted under the CDBG or HOME programs. Costs include staff and related costs required for overall program management, coordination, monitoring, reporting, evaluation, and preparation of studies and plans. No more than 20% of CDBG grant funds (plus allowable program income) and 25% HOME funds may be used for planning and administration. Includes \$1,500 to help support a 2019 Fair Housing art event for grade school-high school students.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	The City plans to split the CDBG administration dollars of \$313,825 between general administration \$245,299 (which includes \$1,500 for a Fair Housing art event) and Economic Development Administration \$68,596. In addition, the City will use \$223,906 in HOME funds for general administration of the HOME funded programs. The City plans to use up to \$455,805 (\$255,526 CDBG-CV Round 1 and \$200,279 CDBG-CV Round 3) for administration of Round 1 and 3 CDBG-CV funded programs.
2	Project Name	Rehabilitation Operations
	Target Area	City Wide CDBG Eligible Areas

	Goals Supported	Affordable Housing Objective 1.1 Affordable Housing Objective 1.2 Affordable Housing Objective 2.1 Affordable Housing Objective 2.2
	Needs Addressed	Major Home Improvement Minor Home Improvements Affordable Housing Development/Owner and Rental Homeownership Assistance
	Funding	CDBG: \$424,698
	Description	Provides for rehabilitation counseling, loan underwriting and processing, preparing work specification, inspections, and other services related to assisting owners, tenants, contractors, and other entities who are participating or seeking to participate in eligible CDBG and HOME funded rehabilitation activities.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	Thirty-one low-income households will benefit from the proposed activities. Twenty-two additional low-income households will benefit from the proposed activities. However, their accomplishments will be reported under Project #9 CDBG Housing Rehabilitation.
	Location Description	City Wide
	Planned Activities	Housing rehabilitation (HOME 16 units & CDBG 31 units), homebuyer assistance (HOME 5 units), and one Community Housing Development Organization development.
3	Project Name	Single Family (1-4 units) Housing
	Target Area	City Wide
	Goals Supported	Affordable Housing Objective 1.1
	Needs Addressed	Major Home Improvement Minor Home Improvements

	Funding	HOME: \$454,755
	Description	Rehabilitation assistance to bring exiting owner-occupied single-family (1-4 units) housing within the city up to local code, including the removal of lead and other hazards. In addition, for those with disabilities, the funding may make units accessible.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	Sixteen (16) low-income households will benefit from the proposed activities.
	Location Description	
	Planned Activities	Rehabilitation assistance to bring exiting owner-occupied single-family (1-4 units) housing within the city up to local code, including the removal of lead and other hazards. In addition, for those with disabilities, the funding may make units accessible.
4	Project Name	Homebuyer Assistance
	Target Area	City Wide
	Goals Supported	Affordable Housing Objective 1.2
	Needs Addressed	Major Home Improvement Minor Home Improvements Homeownership Assistance
	Funding	HOME: \$76,057
	Description	Direct homebuyer assistance is available to households purchasing a single family (1-4 units) property that meets or will meet the City local code. Homebuyers are eligible to receive the lesser of \$14,999 or the gap needed to make the unit affordable. The homebuyers access Single Family (1-4 units) Housing project funds to bring the property up to code, if needed.
	Target Date	12/31/2019

	Estimate the number and type of families that will benefit from the proposed activities	5 low-income households will benefit from the proposed activities.
	Location Description	
	Planned Activities	Direct homebuyer assistance is available to households purchasing a single family (1-4 units) property that meets or will meet the City local code.
5	Project Name	Homebuyer and Rental CHDO
	Target Area	City Wide
	Goals Supported	Affordable Housing Objective 2.2
	Needs Addressed	Major Home Improvement Minor Home Improvements Affordable Housing Development/Owner and Rental
	Funding	HOME: \$134,344
	Description	Qualified Community Housing Development Organizations (CHDOs) demonstrating the capacity to deliver projects of similar or larger scope, value, and quality may receive assistance to develop single or multi-family housing units for the purpose of homeownership or rental. There is a 15% minimum HOME set-aside.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	One low-income household will benefit from the proposed activities.
	Location Description	

	Planned Activities	Qualified Community Housing Development Organizations (CHDOs) demonstrating the capacity to deliver projects of similar or larger scope, value, and quality may receive assistance to develop single or multi-family housing units for the purpose of homeownership or rental. There is a 15% minimum HOME set-aside.
6	Project Name	CHDO Operating
	Target Area	City Wide
	Goals Supported	Affordable Housing Objective 2.1
	Needs Addressed	Major Home Improvement Minor Home Improvements Affordable Housing Development/Owner and Rental
	Funding	HOME: \$44,781
	Description	Operating funds are available for a non-profit meeting the Community Housing Development Organization (CHDO) requirements. CHDOs must have an eligible project within twenty-four (24) months of the operating award. Funds are limited to 5% of the HOME allocation.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Operating funds are available for a non-profit meeting the Community Housing Development Organization (CHDO) requirements. CHDOs must have an eligible project within twenty-four (24) months of the operating award. Funds are limited to 5% of the HOME allocation.
7	Project Name	Demolition
	Target Area	City Wide

	Goals Supported	Non-Housing Community Development Objective 1.1
	Needs Addressed	Demolition
	Funding	CDBG: \$484,087
	Description	Blighted structures that are not suitable for rehabilitation will be demolished utilizing a ranking system. The City will focus on properties within the CDBG area and deteriorated properties located near schools, on major thoroughfares, and strategically located in transformation housing plans.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	38 units will be demolished.
	Location Description	
	Planned Activities	Blighted structures that are not suitable for rehabilitation will be demolished utilizing a ranking system. The City will focus on properties within the CDBG area and deteriorated properties located near schools, on major thoroughfares, and strategically located in transformation housing plans.
8	Project Name	Code Enforcement
	Target Area	CDBG Eligible Areas
	Goals Supported	Non-Housing Community Development Objective 1.2
	Needs Addressed	Code Enforcement
	Funding	CDBG: \$140,158

	Description	The Code Enforcement Program supports salaries and overhead costs related to the enforcement of state and local codes within the CDBG Code Enforcement areas. Areas are identified by past code enforcement cases, evidence of deteriorating properties, public and private investments, and other factors. Code enforcement, together with other improvements such as rehabilitation, demolition, and public improvements, is expected to arrest the decline of the area.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	2600 units will be addressed.
	Location Description	
	Planned Activities	The Code Enforcement Program supports salaries and overhead costs related to the enforcement of state and local codes within the CDBG Code Enforcement areas. Areas are identified by past code enforcement cases, evidence of deteriorating properties, public and private investments, and other factors. Code enforcement, together with other improvements such as rehabilitation, demolition, and public improvements, is expected to arrest the decline of the area.
9	Project Name	CDBG Housing Rehabilitation
	Target Area	City Wide
	Goals Supported	Affordable Housing Objective 1.1
	Needs Addressed	Major Home Improvement Minor Home Improvements
	Funding	CDBG: \$481,768
	Description	Rehabilitation assistance to address code and potential code violations on single family owner occupied housing within the city of Rockford.
	Target Date	12/31/2019

	Estimate the number and type of families that will benefit from the proposed activities	Thirty-one (31) low-income households will benefit from the proposed activities.
	Location Description	City Wide
	Planned Activities	Assistance for residents to correct code and potential code violations.
10	Project Name	Facade Improvement Assistance Program
	Target Area	City Wide
	Goals Supported	Non-Housing Community Development Objective 3.5
	Needs Addressed	Commercial Corridor Revitalization, Incentives Creation and Retention of Jobs
	Funding	CDBG: \$75,000
	Description	Assistance for qualified expenses related to exterior improvements to facades visible from a public right of way, including brickwork, windows, awnings, and signage.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	Three businesses will benefit.
	Location Description	
	Planned Activities	Assistance for qualified expenses related to exterior improvements to facades visible from a public right of way, including brickwork, windows, awnings, and signage.
11	Project Name	Rehabilitation & Development Assistance (Economic Development)
	Target Area	City Wide

	Goals Supported	Non-Housing Community Development Objective 3.4
	Needs Addressed	Commercial Corridor Revitalization, Incentives Creation and Retention of Jobs
	Funding	CDBG: \$140,286
	Description	Assistance for qualified expenses for development of commercial or industrial property, including design work, mechanical systems, building materials, site readiness, and equipment. Expands the micro-enterprise loan program.
	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	Two businesses will benefit.
	Location Description	
	Planned Activities	Assistance for qualified expenses for development of commercial or industrial property, including design work, mechanical systems, building materials, site readiness, and equipment. Expands the micro-enterprise loan program.
12	Project Name	Stand-by Section 108 Loan Debt Service
	Target Area	City Wide
	Goals Supported	Non-Housing Community Development Objective 3.3
	Needs Addressed	Technical Assistance to Small Business/Incubators Commercial Corridor Revitalization, Incentives
	Funding	CDBG: \$67,526
	Description	Loan guarantee program that leverages CDBG allocation to support larger job-creating/retaining economic development projects through access to low interest capital.

	Target Date	12/31/2019
	Estimate the number and type of families that will benefit from the proposed activities	One business benefited.
	Location Description	
	Planned Activities	Loan guarantee program that leverages CDBG allocation to support larger job-creating/retaining economic development projects through access to low interest capital.
13	Project Name	2019 ESG
	Target Area	
	Goals Supported	Homeless Objective 1.1 Homeless Objective 2.1 Homeless Objective 2.2 Homeless Objective 2.3
	Needs Addressed	Emergency Shelter Operations/Essential Services Homeless Prevention Rapid Re-Housing HMIS Emergency Shelter - Facilities Transitional Housing Facilities
	Funding	ESG: \$180,781
	Description	Provides funding for emergency and transitional shelters, HMIS/Homeless Management Information System, Outreach Prevention, and rapid rehousing. Also includes administration of up to 7.5% of the grant.
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	40 households, singles, and families
	Location Description	City Wide
	Planned Activities	Support for shelters, outreach, Coordinated Entry, Prevention, and Rapid Rehousing.
14	Project Name	CV-Economic Development
	Target Area	City Wide
	Goals Supported	Non-Housing Community Development Objective 3.4
	Needs Addressed	Creation and Retention of Jobs
	Funding	CDBG-CV: \$1,823,224
	Description	CDBG-CV funds to be used to prevent, prepare for, and respond to Coronavirus.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately seventy-two (72) businesses will benefit from CDBG-CV (Round 1 and 3).
	Location Description	
15	Planned Activities	Assistance for qualified expenses for development of commercial or industrial property, including design work, mechanical systems, building materials, site readiness, and equipment. Expands the micro-enterprise loan program.
	Project Name	ESG20 Rockford
	Target Area	City Wide

	Goals Supported	Homeless Objective 1.1 Homeless Objective 2.1 Homeless Objective 2.2 Homeless Objective 2.3
	Needs Addressed	Emergency Shelter Operations/Essential Services Homeless Prevention Rapid Re-Housing HMIS Emergency Shelter - Facilities
	Funding	ESG-CV: \$1,794,268
	Description	<p>Round 1: The budget will be as follows:</p> <p>Homeless Prevention Rental Assistance \$251,024 Homeless Prevention Housing Stabilization and Case Management \$36,000 Rapid Rehousing Rental Assistance \$250,000 Rehousing Housing Stabilization and Case Management \$36,000 Administration \$63,669</p> <p>Round 2: The budget will be as follows:</p> <p>Homeless Prevention \$440,000 Rapid Re-housing \$497,500 ESG Shelter \$76,200 Homeless Outreach \$28,497 Homeless Management Information System \$57,500 Administration \$57,878</p>
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	300 households, families and single adults
	Location Description	City Wide
	Planned Activities	Provides funding for emergency and transitional shelters, prevention, outreach, HMIS/Homeless Management Information System, and rapid rehousing. Also includes administration budget for ESG-CV is \$121,547.

AP-50 Geographic Distribution – 91.220(f)

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

Much of the funding from the CDBG and HOME programs is available for use in CDBG neighborhoods or city-wide, depending on the specifics of the designated activities. Also, some funding is available as a direct individual benefit, rather than an area benefit. The percentages listed below are based on our 2019 budget, with the percentage listed for “CDBG Eligible Areas” consisting of our targeted CDBG Code Enforcement focus areas.

Geographic Distribution

Target Area	Percentage of Funds
City Wide	79
CDBG Eligible Areas	21

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

In 2019, the City has budgeted CDBG funds towards code enforcement efforts and housing rehabilitation programs in specific focus areas of the City. The areas include specific block groups within census tracts 12, 18, 25, 26, 28, 29, 31 and 32. These areas were identified by prioritizing those census tract block groups that have the following characteristics: Primarily residential low-moderate income census tracts; past incidence of both property and neighborhood standards violations; and then weighted by census tract block groups that are experiencing declining property values. The CDBG Code Enforcement area has aging housing stock, with 75% of the homes constructed before 1978. 56% of the properties in these areas have experienced a decline in property values, as compared to a rate of 38% for the City as a whole. In addition, 19% of the properties in the Target Area are vacant, with 26% of the properties receiving 2+ code violations since 1/1/17.

With 51% of the census tracts in Rockford now being considered low-moderate income, the majority of activities will take place in CDBG eligible areas, but many of the programs are open to individuals city-wide. In 2018, the City expanded the homebuyer assistance program to be city-

wide to allow low-moderate income individuals the opportunity to purchase homes in any part of the City, subject to HOME program rules.

Discussion

The City will continue to award program funds to improve the lives of low-moderate income individuals, as well as make improvements to low-moderate income areas of the City and address overall blight within the City. As part of the 2020-2024 Consolidated Plan process, the City is looking to create a Neighborhood Revitalization Strategy Area and anticipates that specific activities or programs will be identified for this newly created area starting in 2020.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The annual goals listed below specify the following production numbers for housing assistance and for homelessness, non-homeless, and special needs populations.

One Year Goals for the Number of Households to be Supported	
Homeless	410
Non-Homeless	83
Special-Needs	0
Total	493

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	440
The Production of New Units	0
Rehab of Existing Units	47
Acquisition of Existing Units	6
Total	493

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The Homeless Goal is supported by funding through the Emergency Solutions Grant (ESG), including ESG-CV. The Non-Homeless Goal is supported by funding through ESG-CV, Community Development Block Grant and HOME Investment Partnerships Program grant. The Non-

Homeless Goal of 85 is a combination of Rental Assistance (30) Rehab of Existing Units (47) and Acquisition of Existing Units (6).

AP-60 Public Housing – 91.220(h)

Introduction

Collectively, via a partnership between the jurisdictional housing authorities (PHAs) Winnebago County Housing Authority (WCHA) and Rockford Housing Authority (RHA,) exists a memorandum of understanding to advance collaborative approaches to meeting the needs of affordable housing. It is under this relationship that both agencies jointly submit the intent to address the needs of housing within the region.

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

As a means to provide the greatest opportunity to PH clients, Winnebago County Housing Authority (WCHA) and Rockford Housing Authority (RHA) address the needs of public housing by continuing to support the de-concentration of public housing, as well as the advancement of opportunities to improve existing public housing stock. These efforts may include, but are not limited to, the support of grant, tax credit and financing applications, the promotion of home ownership programs and education, and the promotion of resident networks or councils through community policing via a neighborhood officer relationship, and participation with the U.S. Department of Housing and Urban Development (HUD) for the Regional Housing Initiative program. WCHA and RHA will continue to provide wait list preferences for working families, disabled families, veterans and the surviving spouses of veterans, elderly families, foster children displacement, participants coming in through the community action agency coordinated entry system aka single point of entry program, and families displaced by natural disaster and domestic violence.

WCHA applied and RHA plans to apply for the 2019 *Moving To Work* demonstration expansion. WCHA continues the administration of a RAD-II in Freeport and a RAD-I for the Freeport Housing Authority, which are part of the WCHA wait list for Rockford participants. RHA and WCHA have Resident and Supportive Services programs. WCHA and RHA are ConnectHome designated agencies with a regional program. WCHA has applied to HUD for a ConnectHome Nation utility allowance waiver to create an affordable internet demonstration program.

Additional WCHA efforts include but are not limited to the following:

- Continuing their partnership with the City of Rockford Human Services Department to implement their Mainstream voucher program for

non-elderly, disabled families.

- Continuing their demonstration program for Youth Aging Out of Foster Care through the Family Unification Program.
- Continue their partnership with the Rockford Police Department to expand the ROCK House Officer Residency Program to encourage officer residency in the jurisdiction along with impacting against high crime, impoverished neighborhoods.
- Administer their Graduated Re-Entry Program for nonviolent ex-offenders exiting early from the prison system. The State of Illinois has expanded this program and WCHA expects to increase it from 10 set-asides in Rockford and include Stephenson and Boone Counties. The program is in partnership with the Illinois Housing Development Authority and the Illinois Department of Corrections.
- They will administer their second round of Rental Housing Supportive Program grant, serving 175 families in Winnebago and Boone Counties.
- They applied with HUD for a national demonstration program that will increase voucher housing opportunities in areas of both opportunity and with limited affordable housing stock.

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

In terms of home ownership, the Public Housing Family Self Sufficiency and Housing Choice Voucher Family Self Sufficiency programs are in place to guide residents to realize homeownership. Computer Technology programs are offered under the site lab Networks that bring homeownership resource assistance to all HA sites. The programs are also made available to the general public, which promote community growth. RHA and WCHA partner with HomeStart and Habitat for Humanity to expand homeownership opportunities and RHA maintains a Homeownership Voucher program. RHA and WCHA are committed to continue to work as partners to advance homeownership possibilities.

RHA has developed and implemented a Section 3 compliance program to promote entrepreneurship. Through this program, RHA has collaborated with local educational institutes and banks to recruitment and educate residents on educational and grant funding opportunities for those looking to create a startup business. Through this program, RHA is hosting educational events for local companies and government agencies to educate all on their responsibilities through the HUD Section 3 program.

Resident councils are supported by the PHAs at all sites, and they have each sponsored a resident council coalition to result in an agency-wide

Resident Advisory Board. All policy matters such as the Admissions and Continued Occupancy Policy, Administrative Plan, Agency Plan and other documents that may be required by HUD are presented to the resident councils and to the resident bodies through both formal hearing and informal meetings. The comments of the resident council are then provided to the housing authority boards at the board meetings. The Executive Director and CEO meet monthly with the resident councils. All updates and changes are directed to each of the resident council presidents. The presidents then share this information with the resident council members.

In an effort to provide instant and continuous information to all residents and the public, the use of electronic media has been implemented. The PHA boards advertise through the media and post notices at the sites for each board meeting. In addition, the regular monthly board meetings are held at different sites as possible to allow for easier access for the residents to attend. Although attendance is not mandatory, it is strongly encouraged that the residents participate in these meetings.

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

WCHA is a HUD designated high performer agency; RHA is a standard performer agency. Both housing authorities are HUD designated high performers for the Housing Voucher program. Neither WCHA or RHA are troubled housing authorities; however if necessary, financial assistance may be found to the extent of availability of funds and application for qualified CDBG or HOME program fund dollars, the jurisdiction will assist in the application for such funds as a means to advance HA housing quality.

Discussion

RHA and WCHA will work to create cost effective affordable housing integrated into opportunity areas and partnered with educational resources. Jointly, the Housing Authorities will continue advancing efforts related to access and the inventory of QUALITY affordable housing. These efforts will be in tandem with the HA's instrumentalities. For RHA, this includes Bridge Rockford Alliance (RHA instrumentality) and its subsidiary, Illinois Housing Alliance. For WCHA this includes Winnebago Homes Association, its instrumentality. The specific instrumentality and subsidiary actions include the acquisition and restoration of foreclosed properties, the renovation of existing units, the ongoing review of process and policies, and the participation in local and regional efforts.

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

Introduction

Funding from the Emergency Solutions Grant allocation is used to support non-profit homeless services providers in Rockford. These funds provide agencies with additional means to target specific activities. In the coming program year, the following goals were identified for the ESG request for proposals.

- (1) Street Outreach funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing or an appropriate health facility.
- (2) Emergency Shelter funds may be used for costs of providing essential services to homeless families and to individuals in emergency shelters, renovating buildings to be used as emergency shelter for homeless families and individuals, and operating emergency shelters.
- (3) Homelessness Prevention funds may be used to provide housing relocation and stabilization services and short and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place. As part of Homeless Prevention Relocation and Stabilization Services, funds may be used to pay for case management services.
- (4) Rapid Re-housing Assistance funds may be used to provide housing relocation and stabilization services and short and/or medium term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. As part of Homeless Prevention Relocation and Stabilization Services, funds may be used to pay for case management services.
- (5) HMIS funds may be used to pay the costs of contributing data to the HMIS designated by the Continuum of Care for the area. These funds may be used to support the intake (HMIS) functions of Coordinated Entry.

The City in conjunction with the Rock River Homeless coalition has a goal to end both youth homelessness and family homelessness by the end

of 2019 while sustaining functional zero for both veteran and chronic homelessness.

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

There are three separate entities that conduct outreach and inreach in our area, all of which are participate in our coordinated entry system. PATH conducts both outreach and inreach several times each week, outreach on a minimum of once per week, and to local shelters/programs on several occasions each week (daily at the busiest shelter). The local Healthcare for the Homeless Program also conducts outreach and inreach several times in the week, ensuring that the homeless are getting their medical needs addressed and connecting them to our coordinated entry system. The Community Action Agency conducts regular outreach to all unsheltered populations and coordinates community wide outreach. The CoC's also created a Homeless Outreach Team (HOT) comprised of volunteers from various agencies who work together to do street outreach as needed. This team is overseen by the Community Lead for the CES system who makes decisions about when and where volunteers are deployed. Ten community agencies participate including: the Veteran's Administration, Rosecrance PATH, Health Care for the Homeless, St. Elizabeth Center, Rockford Rescue Mission, Community Action, Rockford Fire Dept., Rockford Police Dept., Park District Police, and Shelter Care Ministries. The HOT team performs outreach to known and new areas where unsheltered persons are reported to congregate at least weekly. In addition, they respond to requests from the community and local government officials to do targeted outreach when concerns are raised. This team comes together as needed, but someone from the group conducts outreach at least once per week to outdoor locations and known places that homeless people frequent. In addition, laminated information cards are located throughout the community and a 24/7 hotline provide access to the Coordinated Entry System by the homeless.

Addressing the emergency shelter and transitional housing needs of homeless persons

All homeless individuals enter through the Single Point of Entry and are assigned to the appropriate housing, which may include emergency or transitional locations while waiting for a permanent housing slot to open. The CoC has a variety of emergency and transitional units for this purpose. Hotel vouchers are used as needed if a household is not shelter appropriate.

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

The Rockford community has been part of both the Mayor's Challenge to End Veteran Homelessness and Zero: 2016 to end veteran and chronic homelessness. The City reached functional zero for veteran homelessness in 2015 and received federal certification that it has ended chronic homelessness in 2017. Since beginning this process in January 2015, more than 300 homeless individuals and families have been placed in permanent housing, and our homeless population has been reduced by more than half. Veterans, Chronic, unaccompanied youth, and those fleeing domestic violence receive priority. The goal is to eventually maintain only those emergency shelters that are critical, such as domestic violence shelters, and move forward with outreach and rapid rehousing as the primary use of ESG funds. As part of this process, it is also necessary to work toward reducing the time that individuals and families remain homeless. Currently the average number of day that it takes to house a veteran or newly identified chronic individual is about 30 days. Other populations take longer; however, the community is working to reduce the amount of time any population remains homeless to 30 days or less. The City of Rockford has maintained functional zero for both the veterans and chronically homeless.

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 Coordinated Entry System of the CoC has multiple discharge plans with entities, including local hospitals, jail, psychiatric facilities, and DCFS to ensure that persons being discharged without a permanent address are linked with coordinated entry to ensure placement. In addition, homeless prevention is a major focus of the participants in the Continuum of Care. Agencies include homeless prevention as a support program in conjunction with the provision of shelter and other support services. The City is funding homeless prevention activities in the FY 2019 Annual Action Plan. All homeless persons who are able to complete an assessment that identifies their risk factors and assigns them a score so that the most at-risk populations obtain permanent housing first. Youth who are aging out of foster care receive additional support through the Youth Housing Advocacy Program. The CoC is also working with diversion as a new tool and receiving assistance in improving the diversion/prevention

processes from the Corporation for Supportive Housing.

Discussion

The participants in the Continuum of Care work closely together to meet the needs of homeless individuals and families through the continuum of services coordinated through the partnership. City staff and CoC leadership receives technical assistance and tips on best practices through their involvement with Community Solutions and the Built for Zero initiative to help support their efforts to end homelessness. In addition, the City provides technical assistance for the planning efforts and provides a framework through the ESG funding process to focus attention on specific programmatic areas.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

In 2018, technical assistance was provided to the City to develop a regional approach to affordable housing, specifically to create a Regional Housing Initiative for Winnebago, Boone, Stephenson, Ogle, and JoDaviess counties that would allow resident mobility and neighborhood revitalization. The consultant held a kick-off meeting in February 2018, which included project managers from Econometrica and HUD, Executive Directors from the Rockford Housing Authority, Housing Authority of the City of Freeport, and Winnebago/Boone County Housing Authorities, and staff members from the City of Rockford. Project managers from Econometrica completed in-person interviews April 10–12, 2018. The Executive Directors of the Winnebago County, Freeport and Rockford Housing Authorities, Mayors of Freeport and Belvidere, Winnebago County Chairman, Executive Director of Region 1 Planning Center, and City of Rockford Administration and staff participated in the interviews. Based on those interviews, Econometrica drafted a Working Group Charter and membership list in May 2018. In August 2018, Econometrica advised the RRHI participants that the Chicago HUD office was having internal discussions between the respectively involved offices (PIH, FHEO, and CPD) and reevaluating the current RRHI work plan and initiative in general. As a result, HUD asked Econometrica to delay any further work on the RRHI until at least November 30, 2018. No additional actions have been taken.

RHA and WCHA have an intergovernmental agreement for shared Winnebago County jurisdiction, and RHA has expanded and placed housing programs outside of City of Rockford.

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

The City of Rockford continues its efforts to address changes needed to public policies that have fostered concentrations of poverty within the city. Concerns were originally identified in a Regional Fair Housing Equity Assessment commissioned by the Rockford Metropolitan Agency for Planning. The problems were then made part of our Strategic Plan - Section SP-55, Barriers to Affordable Housing. Rockford continues to provide programs that offer rehabilitation assistance for all eligible households of lower income city wide and provide new homeownership opportunities to those purchasing homes while evaluating public policy.

In early 2019, the City of Rockford signed an intergovernmental agreement with Belvidere, Winnebago and Boone Counties to establish the

Northern Illinois Land Bank Authority. Initial start-up costs for the creation of a regional land bank were provided through a technical assistance grant through IHDA. The new Land Bank will enhance the City of Rockford's efforts in addressing vacant and blighted properties, in addition to providing more effective and efficient procedures for returning properties to beneficial private or public uses. Additional IHDA grants funds are dedicated to the first acquisitions of residential properties. The Land Bank has identified properties in Rockford that meet its criteria and will be working with City staff to acquire in the coming months.

In 2019, the City of Rockford passed an ordinance creating a Vacant and Foreclosing Property Registry. This registry will help the City track properties that are or may become nuisances so that the City can prevent further neighborhood decay and identify health, safety, and code issues that need to be addressed. The ordinance requires property owners and banks who are foreclosing on mortgages to register their properties semi-annually; establish reliable contact information for the owners or responsible parties; and maintain the properties in accordance with the City's code. The owner or bank must also designate a property manager with authority to make necessary repairs to bring the properties into compliance with the City's code. A third-party vendor will administer the registry and assist in identifying properties subject to registration under the ordinance. The vendor has been approved by City Council, and the City anticipates registration to begin in September 2019.

The Northern Illinois Community Development Corporation (NICDC) was formed and owned by local banks in the Rockford area in the early 1990's with a purpose of supporting community lending needs and complementing lending already being done by banks. Nearly 30 years later, all of the NICDC's funding has been allocated to local businesses and more money is needed in order to have a greater impact in the community. The City of Rockford and Winnebago County have identified the need to support our neighborhoods. Funding is needed to support home ownership through rehabilitation of troubled residential properties. The City has committed \$200,000 to support the homeowner rehabilitation program through the NICDC, and Winnebago County is considering matching the \$200,000. Twelve regional banks have jointly contributed an additional \$3.5 million of lending capital to the NICDC, \$1 million of which is dedicated to housing rehabilitation.

The City hired a consultant in early 2019 to complete its 2020-2024 Consolidated Plan and create a Neighborhood Revitalization Stabilization Area (NRSA). In addition, the consultant will update the existing Analysis of Impediments (AI). In 2018, HUD released three notices that will (1) indefinitely suspend implementation of the Affirmatively Furthering Fair Housing (AFFH) rule; (2) withdraw the Assessment of Fair Housing (AFH) Tool; and (3) require jurisdictions without an approved AFH Tool to revert back to the AI to fair housing choice. Since Rockford is one of the communities without an approved AFH Tool (3), the City's first AFH is due on April 6, 2024. The City will update our AI in accordance with the HUD Fair Housing Planning Guide. The AI will present research on barriers in obtaining housing that people face within a certain geographic area. The AI process involves a thorough examination of a variety of sources related to housing, affirmatively furthering fair housing, the fair housing

delivery system and housing transactions which affect people who are protected under fair housing law. The AI also includes an active and involved public input and review process via direct contact with stakeholders, focus group sessions with housing experts, public forums to collect input from citizens, distribution of draft reports for citizen review, and a formal presentation of findings. The City has been communicating this community engagement and planning process with other housing partners and agencies since late 2018, and these partners are excited to connect their clients and stakeholders to the process.

The Rock River Homeless Coalition has a Coordinated Intake and Assessment tool incorporated into Rockford HMIS. All homeless persons enter through the single point of entry and are assessed for housing vulnerability and given a score. They are assigned to a variety of housing options (private rental, permanent supportive housing, transitional housing, and emergency shelter) based upon their score and needs. Coordination of this process including policies, procedures, and documents are the responsibility of the Coordinated Assessment and Intake Committee of the Rock River Homeless Coalition (IL501 CoC).

Discussion:

The cost to rehabilitate existing buildings continues to increase, primarily due to material and labor costs, costs associated with lead paint, and local/national historic requirements. Deeper subsidies are required to make projects affordable and economically feasible, but increases are subject to budget limitations, as well as regulations that trigger additional regulatory constraints. The City has aging housing stock, which is proving to be a challenge for the City's housing rehabilitation programs - 78% of the homes in Rockford were built in 1979 or earlier. It is likely that more and more buildings in Rockford will be considered historic or be located in potential historic districts. The increased cost of materials and labor required to meet the historic standards as required by IHPA may result in denials of housing rehabilitation applications as being over the program maximums. If these low-income homeowners cannot find resources to help bring their houses up to code, the number of blighted and vacant properties will increase in the community.

Rockford's homeless assessment tool through HMIS provides a comprehensive intake that addresses all of HUD's required data elements. In addition, the system used, ServicePoint, is one of the most robust HMIS systems in the country. It provides for a variety of options including full case management, shelter management, electronic recordkeeping, referrals and reporting. The Coordinated Intake system prioritizes those with the highest vulnerability and gets them housed first. It focuses on permanent housing; it follows a housing first model. It sends a household to the best fitting intervention from the start. It provides a system-wide prevention and diversion opportunity. It improves system efficiency and fosters more collaboration among providers.

AP-85 Other Actions – 91.220(k)

Introduction:

The City currently provides a variety of services to the residents of Rockford, some funded by CDBG, HOME, and the ESG allocations, with private, State, and other City funds bringing additional assets to the community. Listed below are some of the actions currently performed by the City or under consideration.

Actions planned to address obstacles to meeting underserved needs

While the national economy has recovered from the 2008 recession, the local economic environment in Rockford and the impact it has on the City's available revenues continues to present a challenge. The City was selected for a development of a long-term financial plan by the National Resource Network. They presented their analysis of the City's long-term financial outlook in October 2018 to City Council. They also presented a balanced budget for 2019, which City Council ultimately approved. The 2019 federal budget for CDBG, HOME, and ESG decreased 4% from 2018. The City will continue to look for new funding sources for programs to address underserved needs. Available funding is the major obstacle in providing the services needed to focus on the vast variety of issues that prevent families from breaking out of poverty and from living in the best and most affordable housing possible.

The City continues to maintain a focus on neighborhoods, address blighted areas within the City, as well as building community engagement. In 2018, the City hired an Assistant Neighborhood Stabilization Officer. This new staff person is responsible for coordinating and implementing citywide neighborhood improvement efforts related to neighborhood and property standards, zoning regulations and City ordinances. He is responsible for systematic evaluations of housing stock to determine suitability for available housing assistance programs and making recommendations for demolition evaluations. This position has been crucial to get a better understanding of the overall physical condition of structures within the City in order to evaluate community needs and design appropriate programs. In 2019, the City hired a Neighborhood Specialist, who is responsible for engaging with neighborhood associations, strategizing neighborhood level improvement plans, and communicating neighborhood improvement strategies to stakeholders and the public. A change is also being made in the Neighborhood Standards Division in 2019 with a modification to the supervisor position to focus more on neighborhood stabilization, including management of blight reduction ordinances and collaboration with other partners on potential redevelopment programs. In addition, other grass-root organizations are focused on improving neighborhoods and increasing community engagement. Transform Rockford was started in 2013 as a community-driven grass roots efforts to help our region become a "Top 25 Community by 2025". "Great Neighborhoods" is a project stemming

from the Transform Rockford initiative and is focused on improving neighborhoods, working closely with the City of Rockford and other agencies on neighborhood initiatives. These strategies, in collaboration with the City's HOME and CDBG programs, are focused on improving neighborhoods. Improvements will be realized by identifying and addressing blighted and deteriorated properties, engaging residents to take ownership of their neighborhoods, and leveraging available resources within the community to make a greater impact.

Actions planned to foster and maintain affordable housing

To foster and maintain affordable housing the City will participate in marketing activities while taking into consideration the status of program priorities and waiting lists, Housing Partnership Group marketing efforts, funding, general contractor availability, and the current demographics of the City of Rockford. The Housing Partnership Group is a group of local housing providers that meet regularly. It includes potential Community Housing Development Organizations, neighborhood not-for-profits, housing developers, public housing authorities, governmental agencies, low-income legal service providers, financial institutions, and a HUD certified housing counseling agency. The organizations serve similar populations and therefore collaborate on marketing. This group meets regularly to share program updates, provide referrals, and discuss how to foster and maintain affordable housing. 2017 marketing activities resulted in an active wait list and interested party list of over 100 households for the City's HOME-funded housing rehabilitation programs in 2018. As a result, the City developed a lottery system for the HOME housing rehabilitation program, subject to 2019 HOME program allocations. The 2019 CDBG Code Enforcement program is focused on community engagement in targeted areas of the City. An assigned Neighborhood Enforcement Specialist meets with residents, neighborhood groups, and churches to provide information about the City's property code ordinances, as well as available resources. The new CDBG housing rehabilitation program will be targeted to single-family, owner-occupied households. The City is engaging other community resources to discuss ways to combine resources to make a greater impact in these neighborhoods.

WCHA has applied for MainStream vouchers and was awarded 28. In addition, WCHA has applied to expand its Family Unification Program and received Veterans Assisted Supportive Housing (VASH) vouchers. RHA has applied for Family Unification Program Vouchers and Tenant Protection Vouchers, which they could add to the regular Section 8 vouchers, and VASH vouchers that they already manage.

Actions planned to reduce lead-based paint hazards

- Continue to meet HUD lead-based paint abatement standards in housing rehabilitation programs.
- Identify additional funding to perform abatement on pre-1978 housing in the target census tracts and perform abatement to reduce affected units.

- Seek funding as it becomes available to provide testing and abatement of lead-based paint hazards in privately owned housing where children under six years of age are present.
- Expand the stock of lead safe housing units through housing initiatives.
- Seek funding as it becomes available to provide for testing, abatement, training, and educational awareness.
- Increase the number of lead-certified contractors eligible to work on HOME, CDBG, and ESG projects.

Actions planned to reduce the number of poverty-level families

Rockford will continue its HOME-funded housing rehabilitation program, as well as roll out a new CDBG housing rehabilitation program. These programs will help owner-occupants live in decent and safe housing and improve their energy costs.

The City will continue its efforts in conjunction with the Community Action Agency and the Rockford Housing Authority to reduce the number of poverty-level families through the development of services needed to assist those families with educational opportunities, job growth, and life skills training through the various social service agencies operating in the city.

Community Action will continue its funding efforts to support poverty-level persons in obtaining training and education in high demand, high paying fields by subsidizing the cost of job training. Current training focus areas include cold forming, CNC, and nursing.

RHA will continue to advance, as part of its commitment to Section 3 and MBE/WBE programs, co-operative opportunities to grow and create business platforms that benefit and create jobs for poverty level families.

Actions planned to develop institutional structure

1. Work with non-profit organizations to address community needs and provide support to federal and non-federal funding initiatives.
2. Work with private industry to address important issues that hamper housing and community development efforts.
3. Identify opportunities to create private/public partnerships for project finance and development to leverage federal funds.
4. Continue to work strategically on a community-based approach to identify and work with stakeholders to address the issues caused by vacancy and abandonment.
5. Continue to plan for and provide input on the scope, development, and replacement/revitalization of public and affording housing in Rockford to foster the de-concentration of poverty and affirmatively further fair housing.

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

The City will continue to coordinate planning activities with private housing and social service agencies, including participation in the Rock River Homeless Coalition meetings for Winnebago and Boone Counties, continued strategic development of the Continuum of Care, and enumeration of point-in-time and homeless surveys. City staff will also continue its participation in other coalitions and study groups as the opportunity arises.

Discussion:

The actions are primarily the continuation of what the City is currently doing in the various areas. No major obstacles in the institutional structure have been identified that need to be addressed. The City is also satisfied with its efforts to coordinate with private housing and social service agencies.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

Introduction:

The following provides details on program specific requirements for each of the three entitlement programs: Community Development Block Grant, HOME Investment Partnership, and ESG.

The years covered in the certification process of CDBG funds that will be used for activities that benefit persons of low and moderate income will be 2017, 2018, and 2019.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0

Total Program Income:

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Not applicable.
2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

See Appendix for the City's Resale/Recapture policy.
3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

See Appendix for the City's Resale/Recapture policy.
4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City does not intend to use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME

funds.

Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

Agencies that are currently funded agencies or those who have received prior funding from the Department of Human Services will be evaluated on past performance in carrying out programmatic activities and contractual compliance. Factors such as agency ability to meet service delivery goals, timely expenditure of funds, timely reporting, accuracy of reporting, ability to meet audit requirements, and other programmatic and fiscal contractual requirements will be considered. These other factors will be considered in conjunction with the proposal score in developing an overall recommendation for agency funding. Households receiving ESG Rapid Rehousing assistance may receive assistance up to 24 months. The CoC recommends that households receiving ESG Rapid Rehousing participate in a step-down payment plan to gradually shift rental costs to the household.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The Rock River Homeless Coalition (RRHC) implemented a Coordinated Intake & Assessment (CI/A) system effective January 2, 2015. The system is comprised of a Single Point of Entry (SPOE) location. This location is open from 8:00 am until 5:00 pm on Monday-Friday, excluding recognized holidays. An after-hours “Hotline” is available for 24-hour contact. The SPOE conducts initial screenings and assessments, which allow for service matching and referrals to appropriate housing options. The SPOE is also responsible for maintaining a Centralized Waiting list. All Rock River Homeless Coalition (RRHC) member agencies that operate any housing programs including Permanent/Permanent Supportive Housing (PH), Transitional Housing (TH), Emergency Shelters (ES), Rapid-Rehousing, or Homeless Prevention for the homeless will operate by this procedure in order to better serve the homeless population. This does include both CoC/ESG funded agencies and those funded through other means. The RRHC also seeks collaborations with other key stakeholders in order to make this a community-wide effort to end homelessness in Winnebago and Boone Counties. Based on HUD recommendations, the SPOE prioritizes clients based on lowest income, longest/chronically homeless and greatest barriers. In accordance with the Housing First Model, those with the highest priority will be directed to Permanent Housing options first (including supportive and non-supportive housing options), followed by Transitional Housing

and Emergency Shelters. Based on federal initiatives, special preference will also be given to veterans and chronically homeless individuals or families.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The ESG funds will be awarded to community-based, nonprofit organizations providing emergency shelter and related services to the homeless, on a dollar-for-dollar match. The City issues a request for proposals for the eligible functions of ESG. A focus is placed on low/no barriers projects, on rapid rehousing, and the project's ability to move participants to permanent housing quickly. Once the proposals are received, City staff, along with feedback from a Rock River Homeless Coalition committee, reviews and makes recommendations for awards. These recommendations go to City Council for final approval. **The City may also utilize these funds for the approved uses above internally, if outside agency capacity is limited.**

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The City requires non-profits participating in the ESG program to have homeless representatives on their board of directors. In addition, the Rock River Homeless Coalition includes homeless and formerly homeless persons who advise on the ESG program.

5. Describe performance standards for evaluating ESG.

ESG performance is monitored using the HUD CPD Monitoring standards. All recipients funded under this proposal must provide required data to the City of Rockford in order to be reimbursed for eligible expenses. ESG recipients must provide performance reports through HMIS that measures their performance against HUD goals.

The City strives to meet all program specific requirements as detailed in the enabling legislation and program guidelines. City staff work with sub-grantees to ensure that these requirements are met and oversees internal operations towards the same goal.