

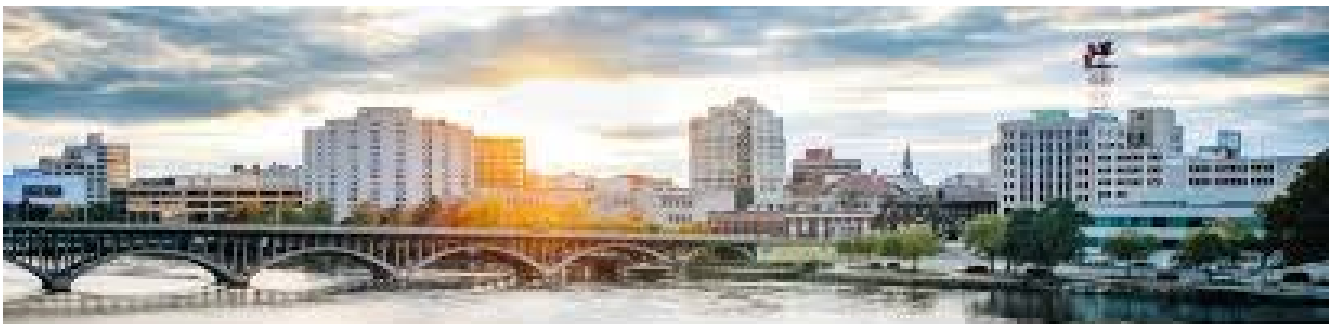


# **CITY OF Rockford**

*425 E. State Street  
Rockford, IL 61104*

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## **FY 2020-2024 Five-Year Consolidated Plan and FY 2020 Annual Action Plan**



<b>2020-2024 Consolidated Plan &amp; Amendments</b> <b>HUD submittal timeline</b> (Amendment 2 & 3 start on page 247 of this pdf)		
<b>Document</b>	<b>Submittal Date</b>	<b>Reason for Amendment, if applicable</b>
<b>2020-2024 Con Plan</b>	6/11/2020	NA
<b>Amendment 1</b> (Minor)	12/31/2020	1. Reduction in 2020 allocations for CDBG & HOME 2. Implementation of the HOME Admin CARES Act waiver 3. Minor grammatical updates were made
<b>Amendment 2</b> (Substantial)	3/31/2023	Neighborhood Stabilization Program (NSP1) Close out required amendments: 1. Added how the City plans to utilize NSP1 Program Income 2. Added how the City plans to dispose of City owned properties
<b>Amendment 3</b> (Substantial)	3/31/2023	Realigned strategic goals with current strategies to meet the needs in the community. 1. CDBG-CV award increased business goals 2. Increased funding for Infrastructure, Housing Development, and the removal of blighted commercial buildings which reduced Housing Rehabilitation and Economic Development goals

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- Analysis of Impediments to Fair Housing Choice
- Neighborhood Revitalization Strategy Area



## Executive Summary

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

#### 1. Introduction

The City of Rockford, Illinois is an entitlement community under the U.S. Department of Housing & Urban Development's (HUD) Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG). In compliance with the HUD regulations, the City of Rockford has prepared this FY 2020-2024 Five Year Consolidated Plan for the period of January 1, 2020 through December 31, 2024. This consolidated plan is a strategic plan for the implementation of the City's Federal Programs for housing, community, and economic development within the City of Rockford.

The Five Year Consolidated Plan establishes the City's goals for the next five (5) year period and outlines the specific initiatives the City will undertake to address its needs and objectives by promoting: improving City infrastructure, the rehabilitation and construction of decent, safe, and sanitary housing; creating a suitable living environment; removing slums and blighting conditions; promoting fair housing; improving public services; expanding economic opportunities; and principally benefitting low- and moderate-income persons.

This Five Year Consolidated Plan is a collaborative effort of the City of Rockford, the community at large, social service agencies, housing providers, community development agencies, and economic development groups. The planning process was accomplished through a series of public

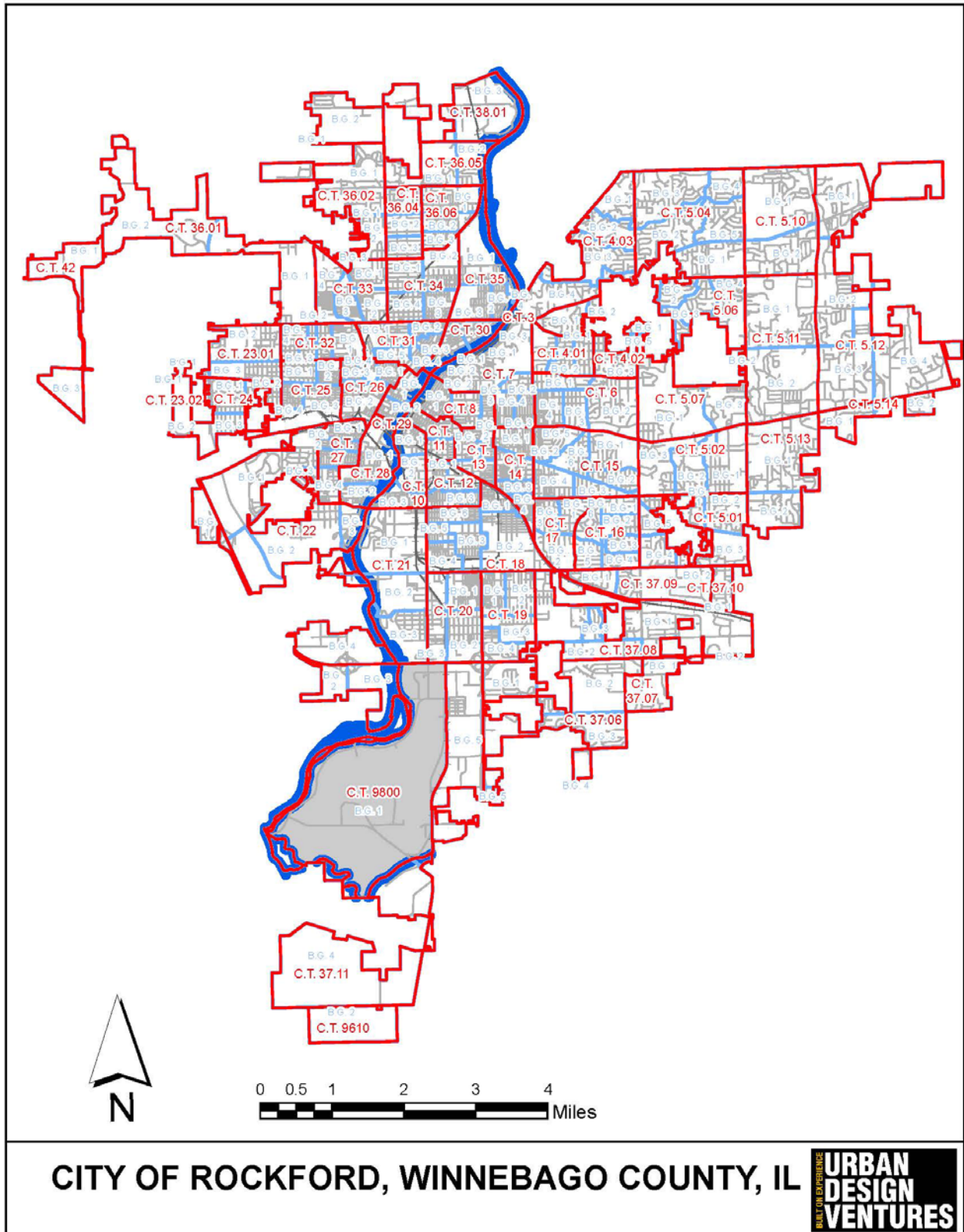
meetings, stakeholder interviews, resident surveys, statistical data, and review of the City's Comprehensive Plan and other community plans.

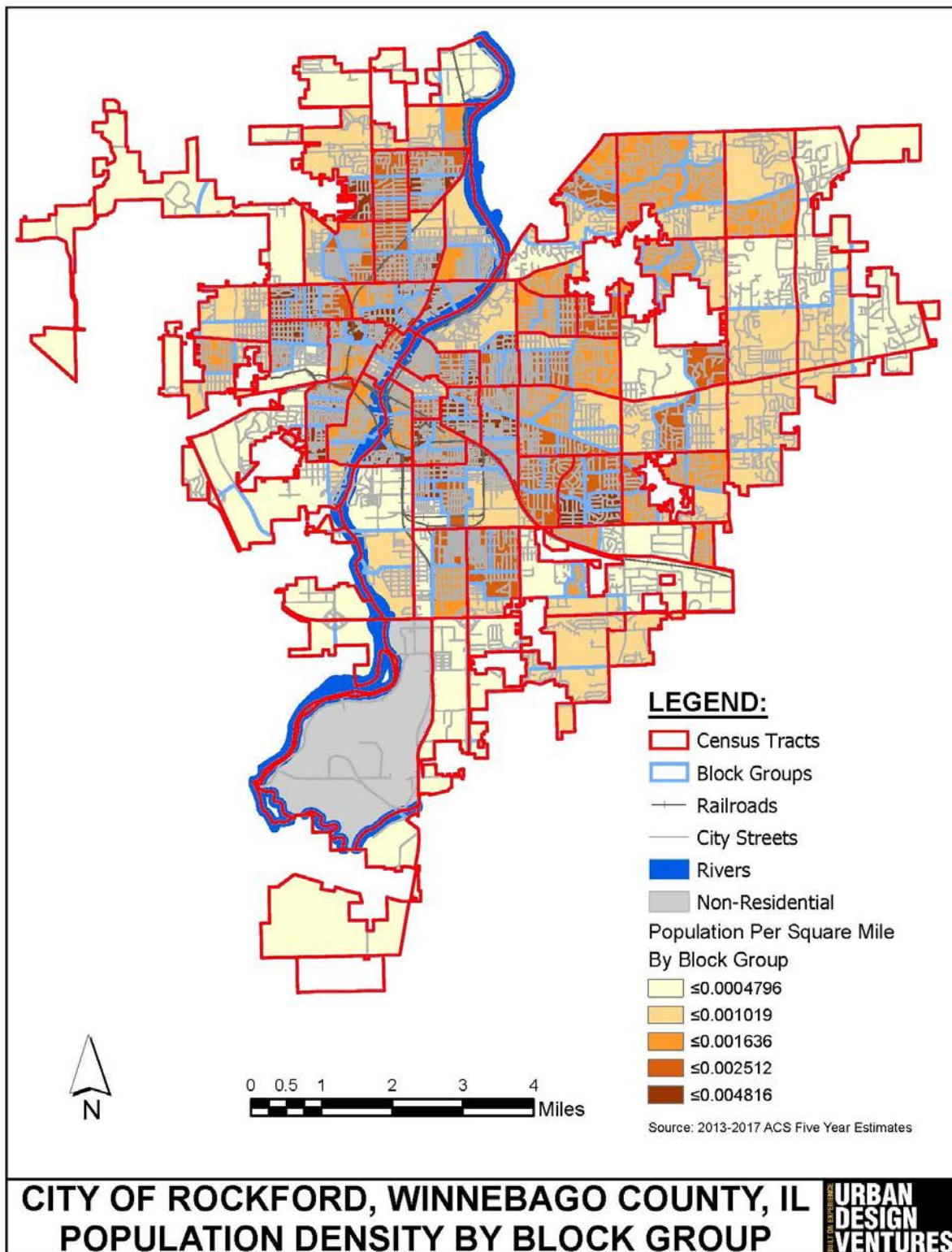
**Maps:**

The following maps which illustrate the demographic characteristics of the City of Rockford:

- City of Rockford Census Tracts and Block Groups
- Population Density by Census Tract
- Percent White Population by Census Tract
- Percent Minority Population by Census Tract
- Percent Population Age 65+ by Census Tract
- Percent Owner-Occupied Housing Units by Census Tract
- Percent Renter-Occupied Housing Units by Census Tract
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- Low/Moderate Income Percentage by Block Group
- Low/Moderate Income with Minority Percentage by Block Group
- Section 8 Housing by Census Tract
- Scattered Public Housing Sites by Census Tract
- Public Housing Sites

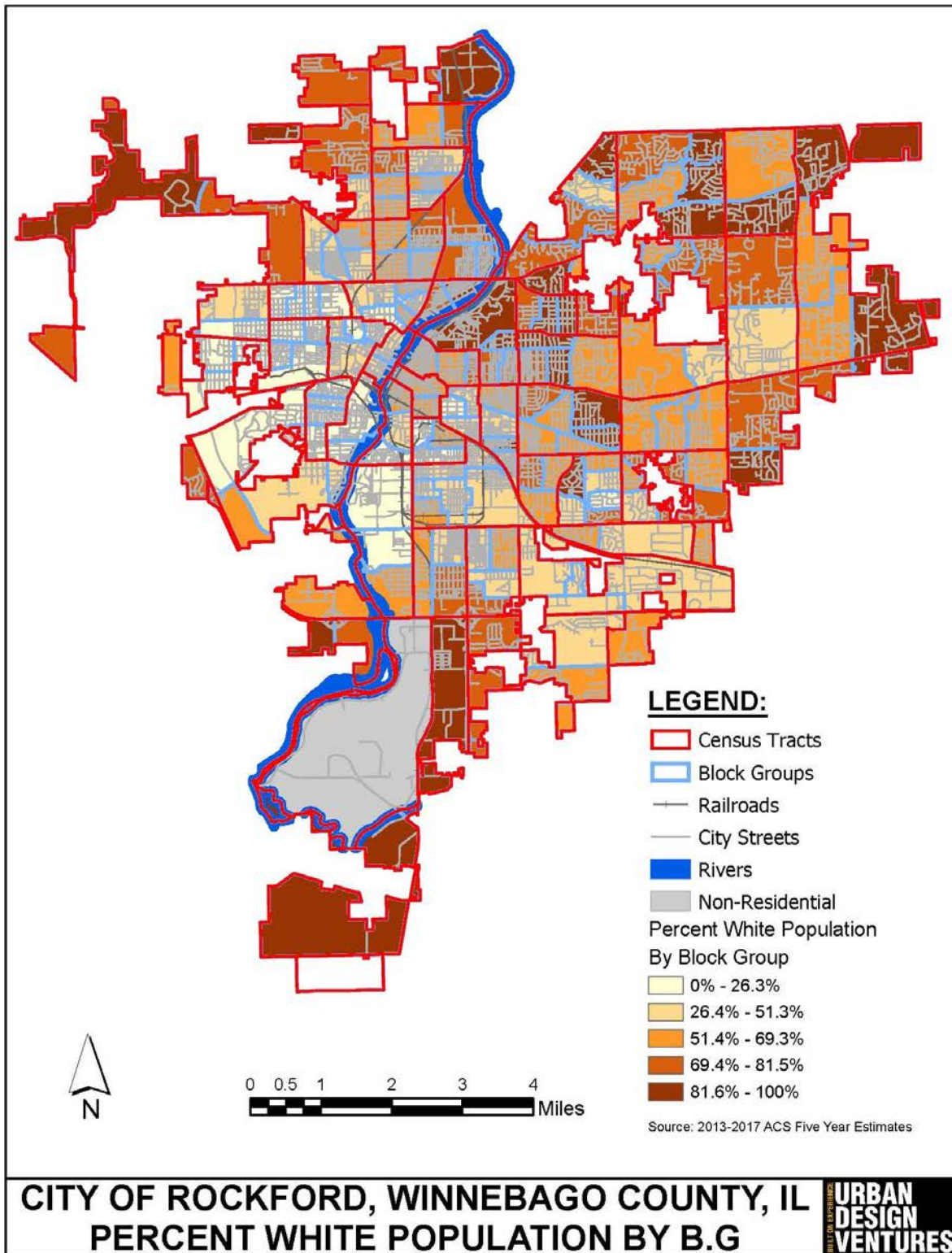
**City of Rockford Census Tracts and Block Groups:**

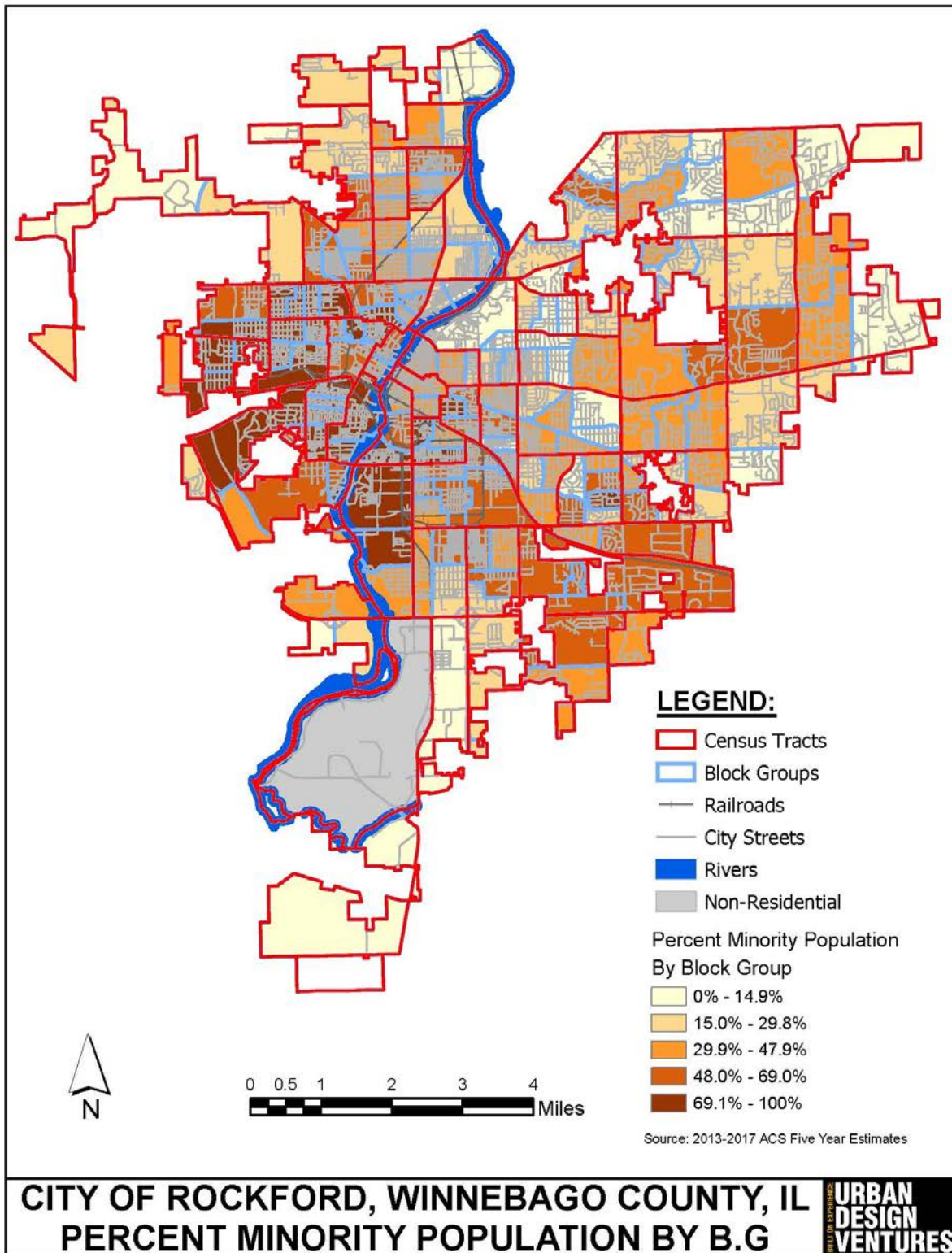


**Population Density by Census Tract**



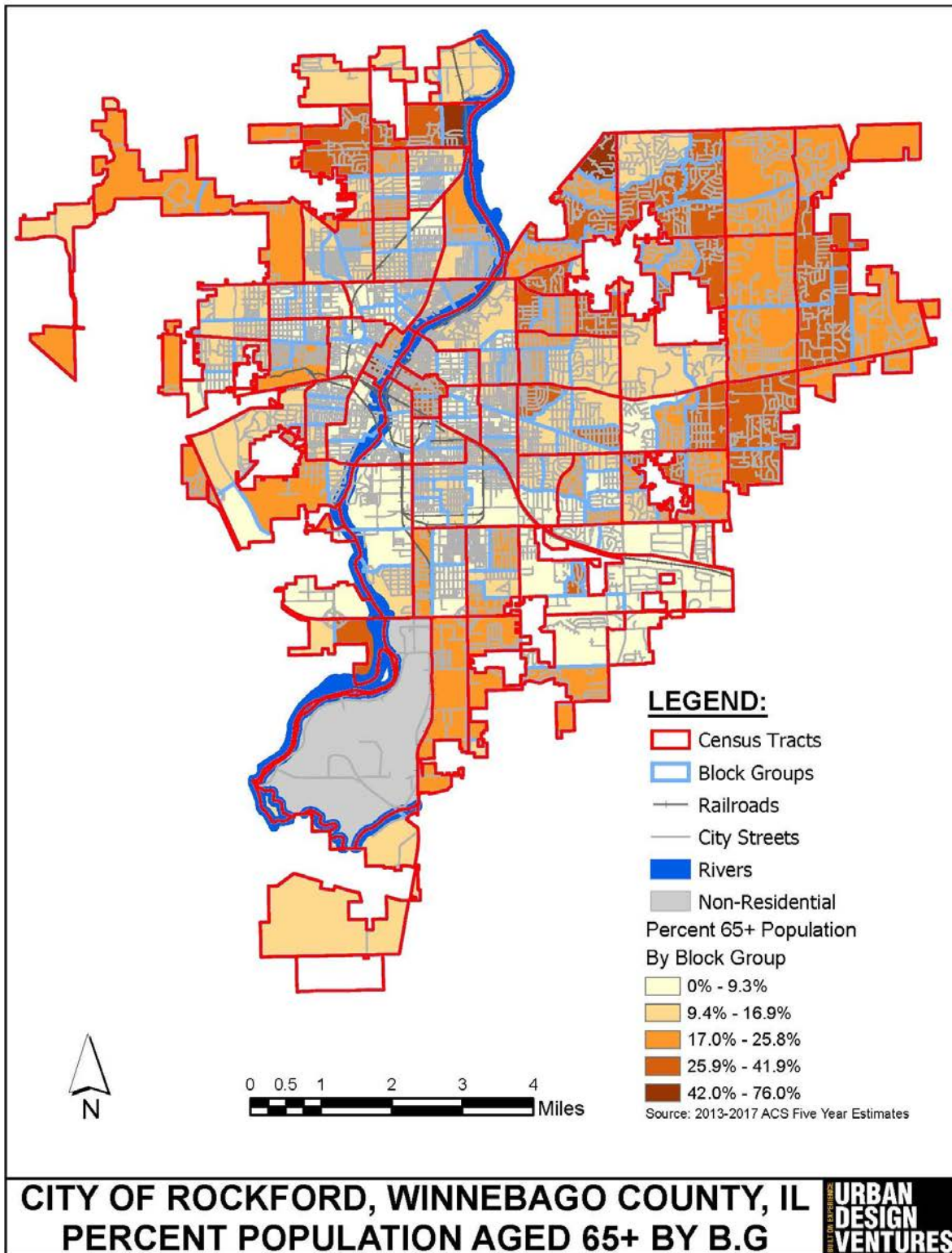
## Percent White Population by Census Tract



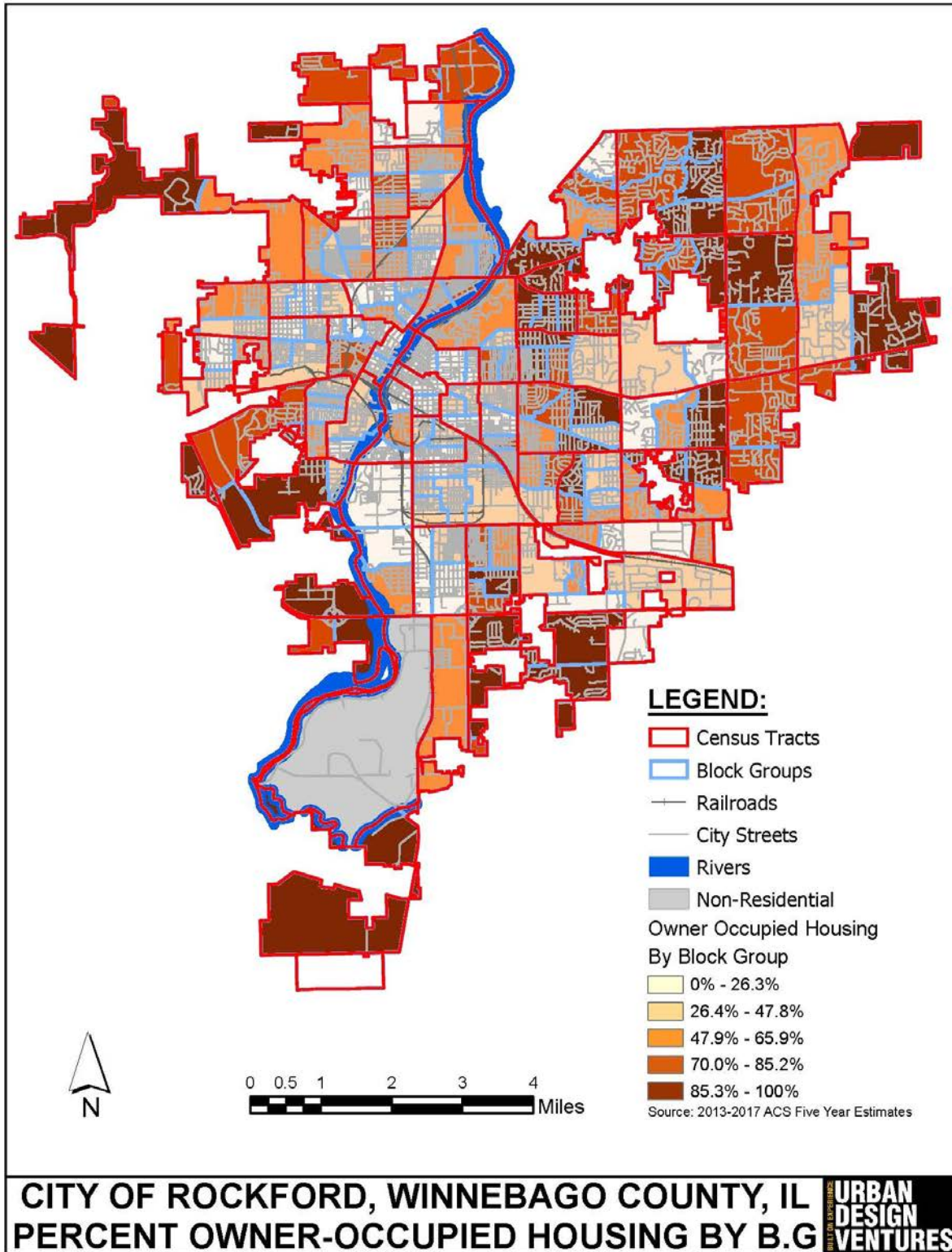
**Percent Minority Population by Census Tract**

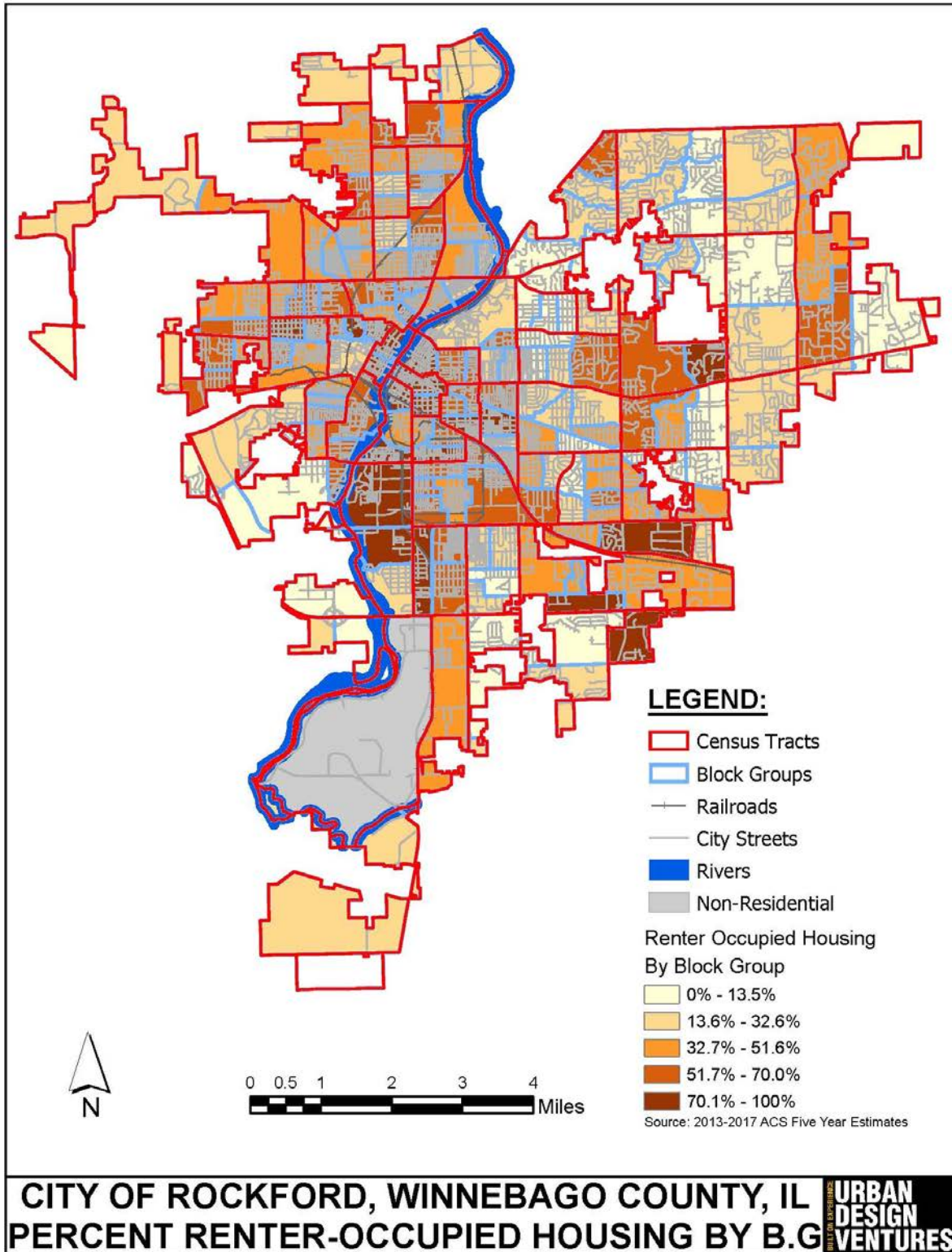


## Percent Population Age 65+ by Census Tract

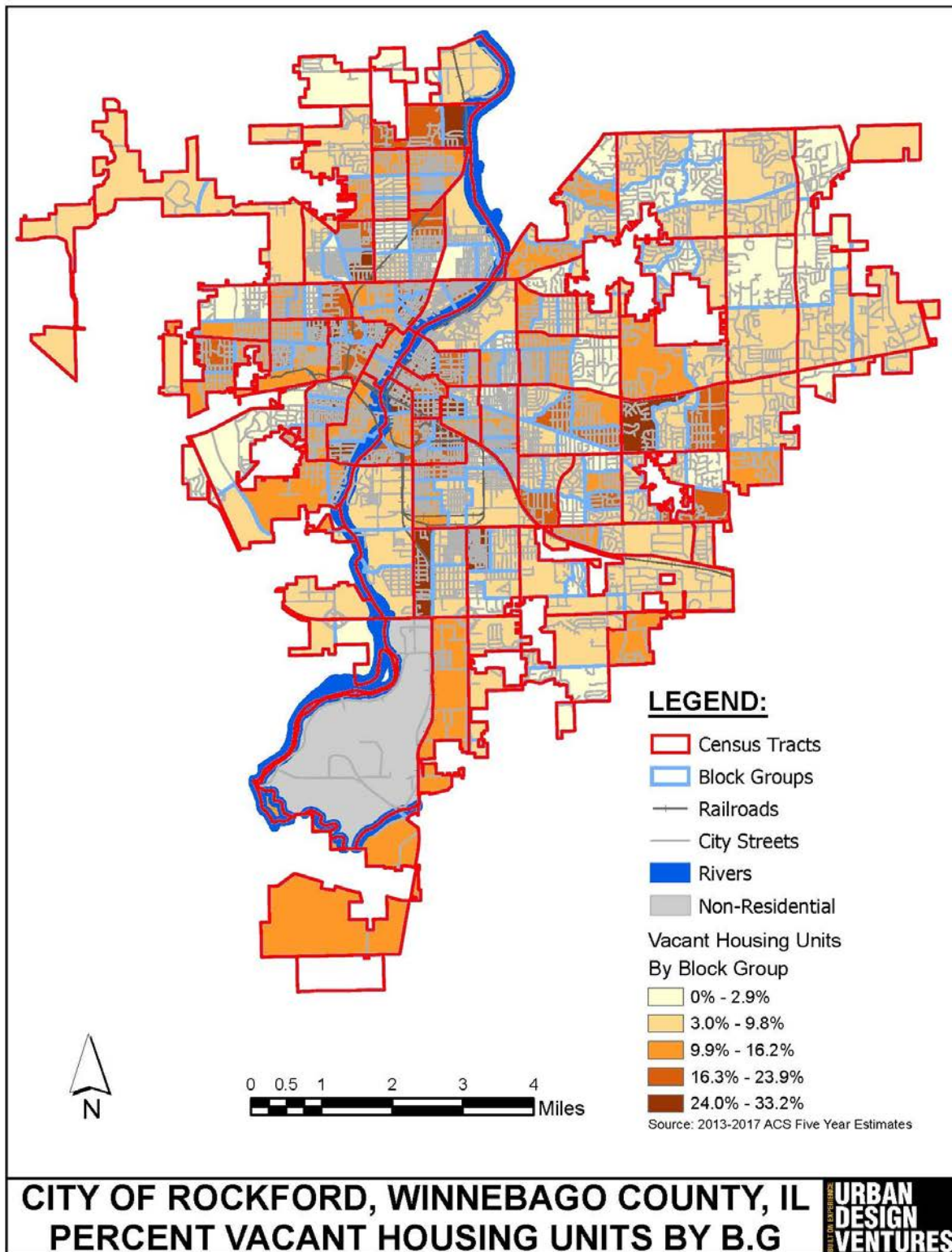


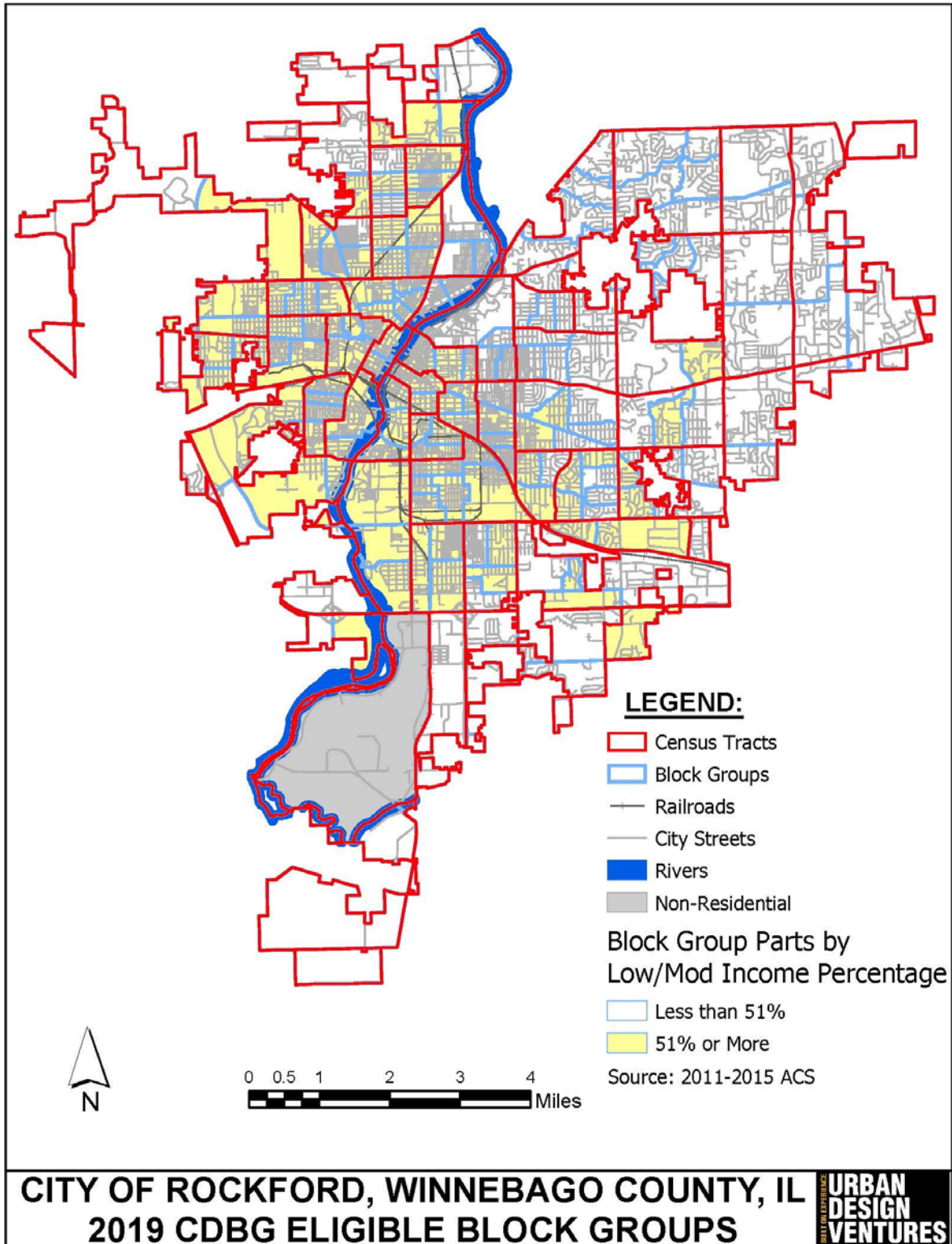


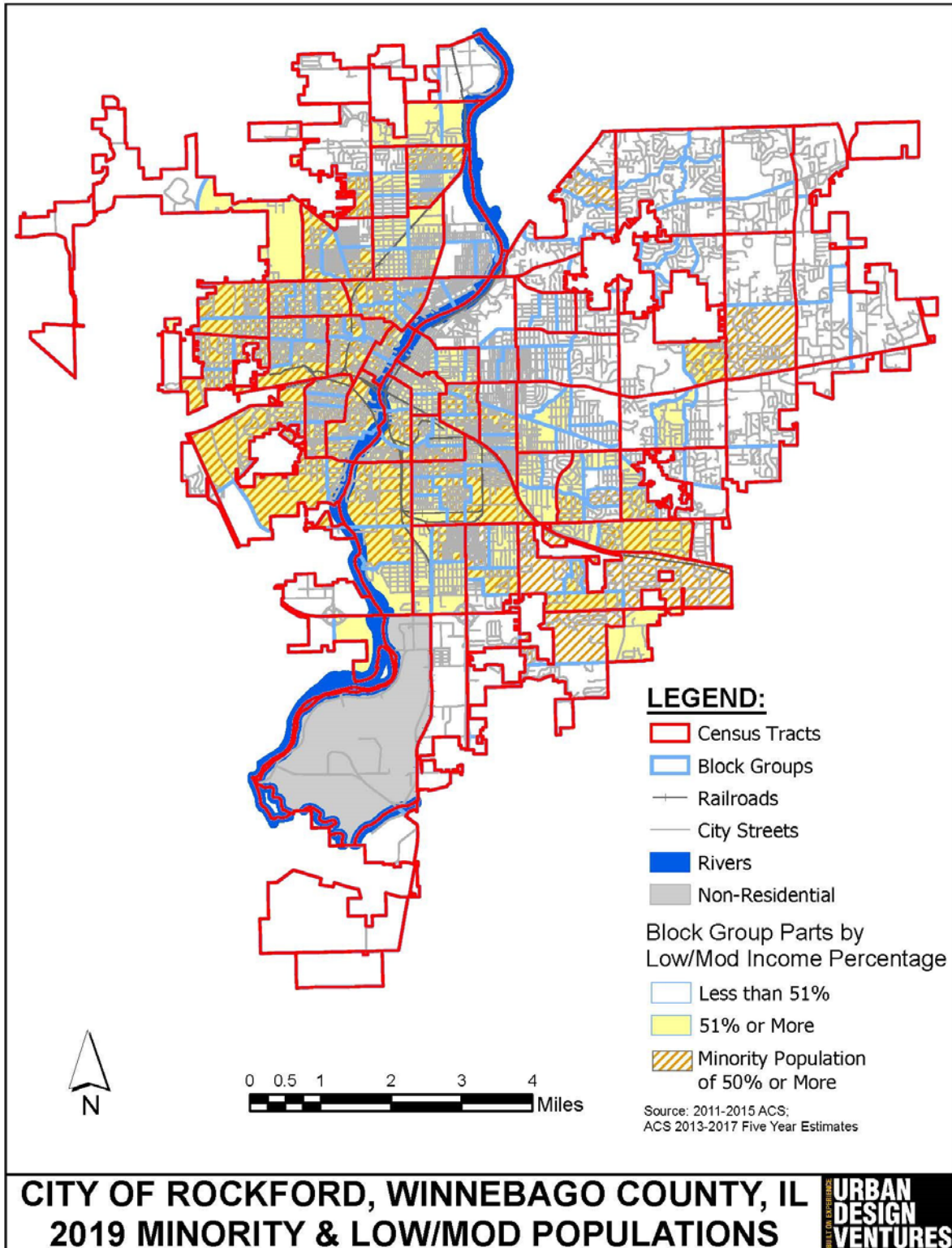
**Percent Owner-Occupied Housing Units by Census Tract**

**Percent Renter-Occupied Housing Units by Census Tract**



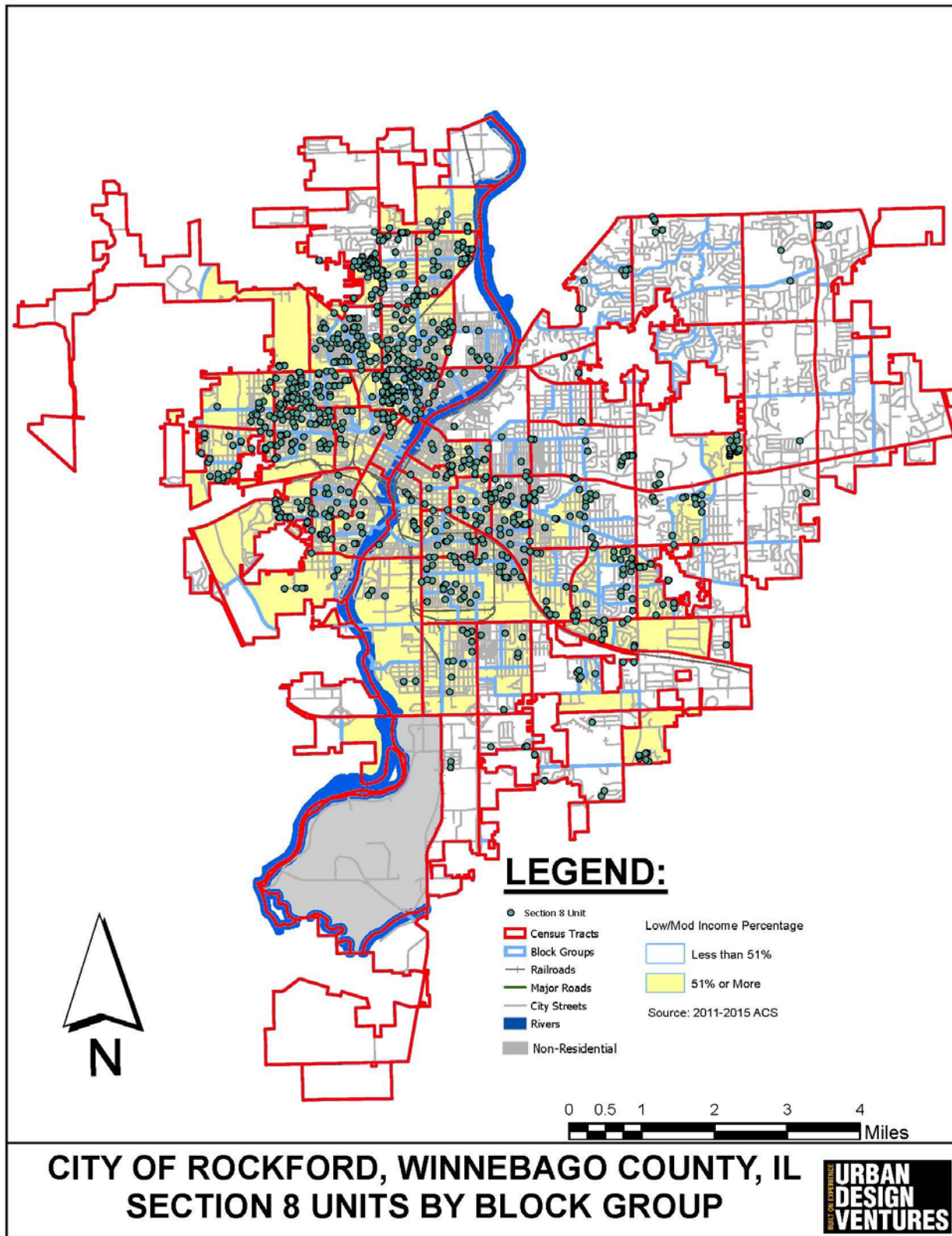
**Percent Vacant Housing Units by Census Tract**

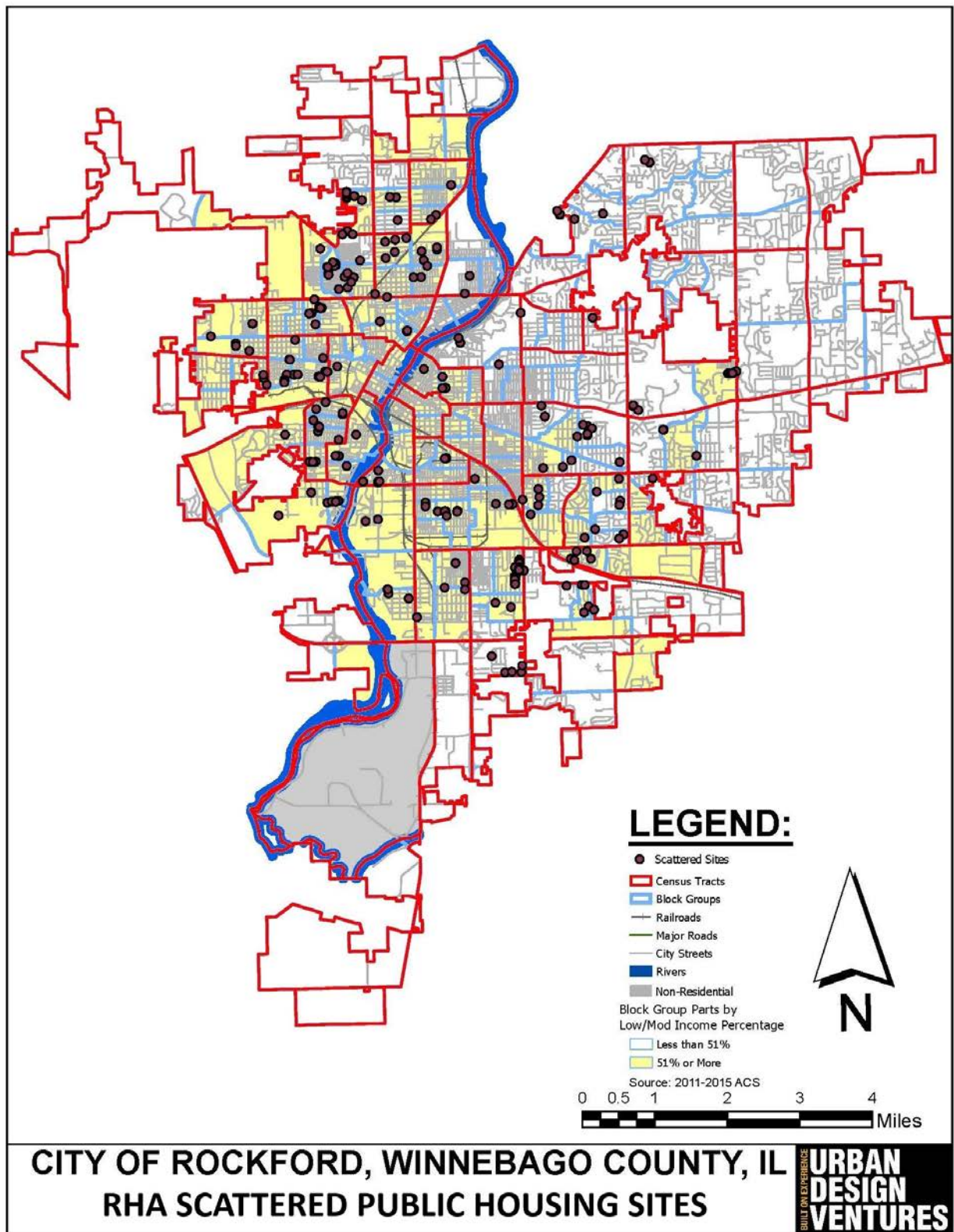
**Low/Moderate Income Percentage by Block Group**

**Low/Moderate Income with Minority Percentage by Block Group**

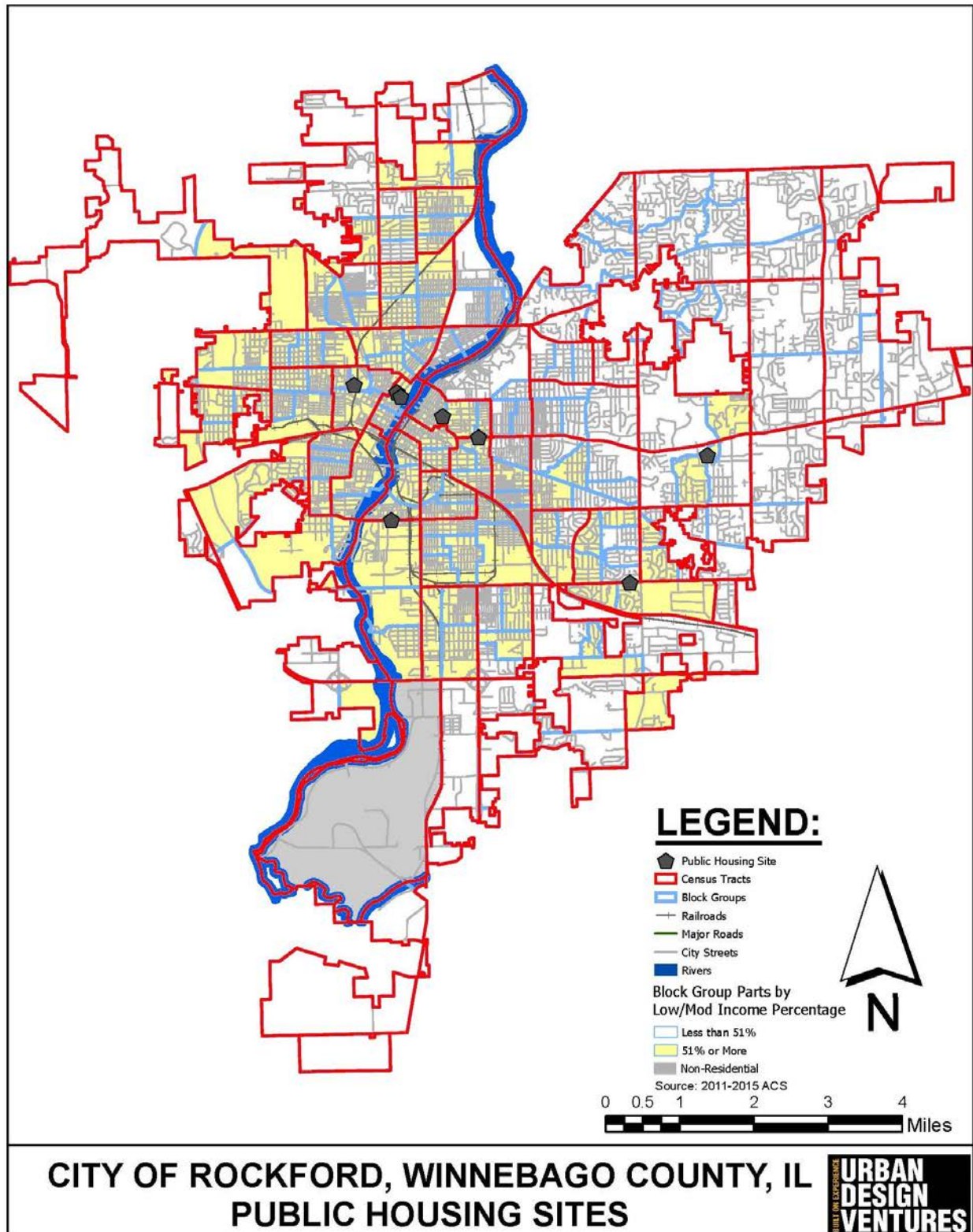


Section 8 Housing by Census Tract



**Scattered Public Housing Sites by Census Tract**



**Public Housing Sites**



## 2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The "Vision" of this Five Year Consolidated Plan is to serve as a consolidated planning document, an application, and a strategic plan for the City of Rockford. The plan contains a range of goals, objectives and outcomes formulated to address the needs identified for housing, homelessness, other special needs, community development and economic development. The following goals and objectives have been identified for the five-year period of FY 2020 through FY 2024:

### Housing Strategy (High Priority)

**Priority Need:** There is a need to increase the amount of affordable, decent, safe, and sanitary housing for homebuyers, homeowners, and renters.

**Objective:** Improve, preserve, and expand the supply of affordable housing for low- and moderate-income persons and families that is decent, safe, and sound.

#### Goals:

- **HS-1 Housing Development** – Increase the number of affordable housing units in the City for owners and renters by assisting with acquisition, development fees, construction, and rehabilitation.
- **HS-2 Housing Rehabilitation** – Continue to assist with rehabilitating existing affordable housing units occupied by owners and renters in the City by addressing code violations, emergency repairs, energy efficiency improvements, and handicap accessibility.
- **HS-3 Homeownership** – Continue to assist low- and moderate-income homebuyers to purchase homes by providing direct subsidies which include but are not limited to down payment and closing cost assistance including housing counseling fees, interest subsidies, etc.
- **HS-4 Fair Housing** – Promote fair housing choice through education, testing, training, and outreach in the City of Rockford.
- **HS-5 Project Delivery** – Provide eligible program delivery and oversight for the CDBG and HOME funded housing projects/activities.

### Homeless Strategy (High Priority)

**Priority Need:** There is a need for support services and housing opportunities for homeless persons and persons or families at-risk of becoming homeless.

**Objective:** Improve the living conditions and support services available for homeless persons, families, and those who are at risk of becoming homeless.

#### Goals:

- **HMS-1 Housing** – Support the Continuum of Care's efforts and applicants to provide emergency shelter, transitional housing, permanent supportive housing, and other permanent housing opportunities.
- **HMS-2 Operation/Support** – Assist providers who operate housing or provide support services for the homeless and persons or families at-risk of becoming homeless.

- **HMS-3 Prevention and Re-Housing** – Assist the Continuum of Care’s efforts in prevention of homelessness through anti-eviction activities and program for rapid re-housing.

### **Other Special Needs Strategy (Low Priority)**

**Priority Need:** There is a need to increase housing opportunities, services, and facilities for persons with special needs.

**Objective:** Improve the living conditions and services for those residents with special needs, including the disabled population.

#### **Goals:**

- **SNS-1 Housing** – Increase the supply of affordable, accessible, decent, safe, and sanitary housing for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs through rehabilitation of existing buildings and new construction.
- **SNS-2 Social Services** – Support social service programs and facilities for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs.
- **SNS-3 Accessibility** – Promote and assist in making accessibility improvements for homeowners, making reasonable accommodations, and bring public facilities and infrastructure into compliance with Federal and State Laws.

### **Community Development Strategy (High Priority)**

**Priority Need:** There is a need to improve the community facilities, infrastructure, public services, and the quality of life in the City of Rockford.

**Objective:** Improve the community facilities, infrastructure, public services, public safety, and transportation, along with the elimination of blighting influences in the City of Rockford.

#### **Goals:**

- **CDS-1 Community Facilities** – Improve parks, bikeways and trails, recreational facilities, and all public and community facilities including accessibility improvements to public buildings and all community facilities in the City.
- **CDS-2 Infrastructure** – Improve the public infrastructure through rehabilitation, reconstruction, and new construction, of streets, sidewalks, bridges, curbs, walkways, water, storm water, sanitary sewer, handicap accessibility improvements/removal of architectural barriers, etc.
- **CDS-3 Public Services** – Improve and enhance public services, programs for youth, the elderly, disabled, and general public service programs for low- and moderate-income persons.
- **CDS-4 Code Enforcement** – Undertake code enforcement activities to maintain the existing housing stock in the City.

- **CDS-5 Public Safety** – Improve public safety facilities, equipment, crime prevention, community policing, and ability to respond to emergency situations in the City.
- **CDS-6 Clearance/Demolition** – Remove and eliminate slum and blighting conditions through demolition of vacant, abandoned, and dilapidated structures.
- **CDS-7 Accessibility Improvements** – Improve handicap accessibility improvements and removal of architectural barriers to public and community facilities.
- **CDS-8 Transportation** – Support the expansion of transportation options to assist low- and moderate-income residents in the City.

### **Economic Development Strategy (High Priority)**

**Priority Need:** There is a need to increase employment, self-sufficiency, educational training, and empowerment for residents of the City of Rockford.

**Objective:** Improve and expand employment opportunities in the City for low- and moderate-income persons and families.

#### **Goals:**

- **EDS-1 Employment** – Support and encourage job creation, job retention, and job training opportunities.
- **EDS-2 Development** – Support business and commercial growth through rehabilitation of store fronts and retail space, expansion of businesses, and the development of new businesses.
- **EDS-3 Redevelopment** – Plan and promote the development, redevelopment, and revitalization of vacant and underutilized commercial and industrial sites.
- **EDS-4 Access to Transportation** – Support the expansion of public transportation and access to bus and automobile service to assist residents to get to work or training opportunities.

### **Administration, Planning, and Management Strategy (High Priority)**

**Priority Need:** There is a need for planning, administration, management, and oversight of Federal, State, and local funded programs.

**Objective:** Provide sound and professional planning, administration, oversight and management of Federal, State, and local funded programs and activities.

#### **Goals:**

- **AMS-1 Overall Coordination** – Provide program management and oversight for the successful administration of Federal, State, and locally funded programs, including planning services for special studies, annual action plans, five year consolidated plans, substantial amendments, consolidated annual performance and evaluation reports (CAPER), environmental reviews and clearances, fair housing, and compliance with all Federal, State, and local laws and regulations.

### 3. Evaluation of past performance

The City of Rockford has a history of success through programs funded through the Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), and the Emergency Solutions Grant (ESG). The City has successfully funded housing rehabilitation activities targeting low income and elderly households unable to properly maintain their homes. The City also operates a homebuyer program to provide assistance to new, low income, homebuyers.

The City Department of Human Services and local homeless services providers have expanded the stock of units/bed available to homeless persons, reaching “functional zero” for Veterans and the chronically homeless. The City also works to expand services aimed at helping those persons find employment, housing, healthcare services, and educational opportunities.

In the 2018 program year CDBG activities included the following:

- 49 residential demolitions
- 175 youth served through an after-school program
- 5,671 code violations
- 5 economic development agreements were awarded

HOME Activities:

- 12 Homebuyer assisted
- 24 homeowner rehabilitation assisted

ESG Activities:

- Provided hotel vouchers.
- Managed discharge plans with various entities to ensure placement.
- Provided emergency shelters for victims of domestic violence, youth, and adult male and females.
- Provided technical assistance for the Continuum of Care (CoC), a group of organizations that work closely to meet the needs of homeless individuals and families.

The FY 2018 Consolidated Annual Performance and Evaluation (CAPER) was submitted to HUD for approval on Friday, March 29, 2019.

The HUD CDBG timeliness guidelines requires grantees have a balance of less than 1.5 years CDBG funding as of November 1, 2018. The City of Rockford’s CDBG program balance was 1.21. HUD requires that public services are below 15% of expenditure, the City was below that requirement at 2.32%. The City of Rockford CDBG administration/planning expenditures were at 11.44%, compared to the HUD CDBG requirement of 20%. The City of Rockford 2018 expenditures for projects benefitting low- and moderate-income residents were at 71.22%, above the HUD CDBG

requirement of 70%. The low-mod benefit for the City's multi-year certification was 77.79% for years 2017/2018/2019, as of 12/31/18.

#### **4. Summary of citizen participation process and consultation process**

The City of Rockford has followed its Citizen Participation Plan in the planning and preparation of the Five Year Consolidated Plan. The City held two (2) sets of public hearings. The first set consisted of two (2) Needs Public Hearings which were held on July 9, 2019 at 6:00pm at the UW Health Sports Factory located at 305 S. Madison Street and on July 10, 2019 at the Nordlof Center located at 118 N. Main Street. These two (2) Needs Public Hearings provided the residents, agencies, and organizations with the opportunity to discuss the City's CDBG, HOME, and ESG Programs and to provide suggestions for future CDBG, HOME, and ESG Programs priorities and activities. The City of Rockford advertised the Needs Public Hearings in its local newspapers. The ad appeared in the "Rockford Register Star" on Tuesday, June 25, 2019.

The City of Rockford Community and Economic Development Department maintains a mailing list for its CDBG, HOME, and ESG Programs and sends out copies of its public hearings notices and meetings concerning the CDBG, HOME, and ESG. Notices were also sent to all agencies and individuals who have participated in previous programs and activities.

The City developed the plans based on resident input, the information obtained from agencies, organizations, and meetings with other City staff and departments.

The "Draft" Plans were on display for a 30-day period beginning December 10, 2019. The availability for review of the "draft plans" were advertised in the local newspapers and the plan was on display at the City of Rockford website: [www.rockfordil.gov](http://www.rockfordil.gov), as well as at each of the offices listed below:

- **City of Rockford, Dept. of Community & Economic Development** - 425 E. State Street
- **City of Rockford, Human Services Office** - 612 N. Church Street
- **Rockford Housing Authority** - 223 S. Winnebago Street
- **Hart Interim Library** - 214 N. Church Street
- **East Branch** - 6685 E. State Street
- **Montague Branch** - 1238 S. Winnebago Street
- **Rock River Branch** - 3128 11th Street
- **Rockton Centre Branch** - 3112 N. Rockton Avenue

The City of Rockford advertised the Second Public Hearing in the Rockford Register Star general circulation. The ad appeared on December 9, 2019.

The Public Hearings were held on December 16 and 18, 2019, allowing residents to give their input on the draft version of the Five Year Consolidated Plan and Annual Action Plan before the

submission of the Plan to HUD. The Five Year Consolidated Plan and Annual Action Plan were on public display for a 30-day period beginning December 10, 2019 and ending on January 8, 2020.

A resident survey was prepared and advertised to residents beginning June 27, 2019 through September 3, 2019. A copy was placed on the City's website and sent to local agencies/organizations. The results of the resident survey were used to help determine the goals and outcomes. A more detailed analysis and description of the citizen participation process is contained in Section PR-15, "Citizen Participation."

## **5. Summary of public comments**

The City of Rockford held its Needs Public Hearings on July 9, 2019 at 6:00pm at the UW Health Sports Factory located at 305 S. Madison Street and the second was held on July 10, 2019 at 1:00pm at the Nordlof Center located at 118 N. Main Street. Comments received at that public hearing are included in the attachments at the end of the Five-Year Consolidated Plan.

The Five Year Consolidated Plan and FY 2020 Annual Action Plan was placed on public display from December 10, 2019 to January 8, 2020. Second Public Hearings were held on December 16 and 18, 2019. Comments that were received at this Public Hearing and during the display period are included in the attachments at the end of this Five-Year Consolidated Plan.

The Citizen Participation includes the newspaper ads, meeting flyers, the sign-in sheets, and the summary of the minutes from the public hearings.

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

All comments and suggestions that were received to date, have been reviewed and responses have been prepared. These comments and responses are included in the attachments at the end of the Five Year Consolidated Plan under Citizen Participation.

## **7. Summary**

The main goals of the Five Year Consolidated Plan are to improve the living conditions of all residents in the City of Rockford, create a suitable and sustainable living environment, and to address the housing and community development needs of the City's residents.

The Five Year Consolidated Planning process requires that the City prepare in a single document its strategies and goals to address housing needs; establish and maintain a suitable living environment; and to encourage economic opportunities for every resident. The City will use the Five-Year Consolidated Plan goals to allocate CDBG, HOME, and ESG, funds over the next five

(5) years and to provide direction to its strategic partners, participating agencies, and stakeholder organizations to address the housing and community development needs of the low- and moderate-income residents of the City of Rockford. HUD will evaluate the City's performance based on the goals established in the Five Year Consolidated Plan.

A "draft" of the FY 2020-2024 Five Year Consolidated Plan and FY 2020 Annual Action Plan were placed on display at the following locations:

- **City of Rockford, Dept. of Community & Economic Development** - 425 E. State Street
- **City of Rockford, Human Services Office** - 612 N. Church Street
- **Rockford Housing Authority** - 223 S. Winnebago Street
- **Hart Interim Library** - 214 N. Church Street
- **East Branch** - 6685 E. State Street
- **Montague Branch** - 1238 S. Winnebago Street
- **Rock River Branch** - 3128 11th Street
- **Rockton Centre Branch** - 3112 N. Rockton Avenue

The display period started on December 10, 2019 through January 8, 2020 for a 30-day display period. In addition, the City put the draft Plans on its website ([www.rockfordil.gov](http://www.rockfordil.gov)). Second public hearings were held on December 16 and 18, 2019 to discuss the proposed activities and solicit citizen comments on the Plans. Upon completion of the 30-day comment period, the City of Rockford submitted the Five-Year Consolidated Plan and FY 2020 Annual Action Plan to the U.S. Department of Housing and Urban Development Chicago Office.

## 8. Budget

During the FY 2020 Program Year the City of Rockford will receive the following Federal Funds:

- **CDBG:** \$2,171,919
- **HOME:** \$982,552
- **ESG:** \$184,641

The City of Rockford proposes to undertake the following activities with the FY 2020 funds:

### Community Development Block Grant (CDBG) Funds:

- **CDBG-20-01 CDBG Administration** - \$377,261
- **CDBG-20-02 Housing Services** - \$177,003
- **CDBG-20-03 Rehab Services** - \$225,345
- **CDBG-20-04 CDBG Housing Rehabilitation** - \$690,000
- **CDBG-20-05 Fair Housing** - \$10,000
- **CDBG-20-06 Clearance/Demolition** - \$413,541

- **CDBG-20-07 Economic Development** - \$195,571
- **CDBG-20-08 Section 108 Stand-by Loan Debt Service** - \$83,198
- **Program Income** - \$8,000

**HOME Investment Partnerships Program (HOME) Funds:**

- **HOME-20-09 HOME Administration** - \$98,255
- **HOME-20-10 HOME Housing Rehabilitation** - \$550,884
- **HOME-20-11 Homeownership** - \$76,635
- **HOME-20-12 Housing Development** - \$207,651
- **HOME-20-13 CHDO Operating** - \$49,127
- **Program Income** - \$5,440

**Emergency Solutions Grants (ESG) Funds:**

- **ESG-20-14 Emergency Solutions Grant** - \$184,641
  - **ESG Administration** - \$13,663
  - **Essential Services** - \$15,000
  - **Operating/Rehab of Emergency Shelters** - \$68,000
  - **Homeless Prevention/Rapid Re-housing** - \$57,978
  - **HMIS** - \$30,000

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 the HOME Housing Rehabilitation project.

City Council approval of the FY 2020 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 exceeds \$25,000.

A substantial change invokes the citizen participation process and City Council approval. A substantial amendment is required for proposed activities not previously described in the plan or increases/decreases in grant/activity dollars that cumulatively total thirty (30) percent of that program year's grant allocation. Monetary movement within plan strategies (Housing, Homeless, Other Special Needs, Community Development, Economic Development, and Administration) can fluctuate within the strategy category and not trigger a substantial change.



## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

**1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source**

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

Agency Role	Name	Department/Agency
CDBG Administrator	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

The administering lead agency is the City of Rockford's Department of Community and Economic Development for the CDBG and HOME Programs. The ESG program is administered by the City of Rockford's Department of Human Services. The City prepares the Five-Year Consolidated Plans, Annual Action Plans, Environmental Review Records (ERR's), the Consolidated Annual Performance and Evaluation Reports (CAPER), monitoring, pay requests, contracting, IDIS, and oversight of the programs on a day to day basis.

The planning process actively encouraged participation of City housing and community service organizations, affordable housing providers, service agencies that assist the low- and- moderate-income and principally low- and moderate- income clientele, advocates, and others. The City of Rockford encourages residents to provide input and participate in planning, implementation, and assessment of the CDBG, HOME, and ESG programs. This Five-Year Consolidated Plan is developed through public hearings, the use of existing data from previously approved plans and studies, consultation with a wide variety of local non-profit agencies, and discussions with other City of Rockford Departments. For-profit, non-profit, community and faith-based organizations were engaged several times throughout the prior year to assess City needs and priorities.

## **Consolidated Plan Public Contact Information**

**Contact Person:**

Ms. Deb Dorsey, Division Head

**Address:**

425 E. State Street 2nd Floor  
Rockford, IL 61104

**Phone:**

779-348-7442

**Fax:**

888-789-0621

**E-Mail:**

[Deb.Dorsey@rockfordil.gov](mailto:Deb.Dorsey@rockfordil.gov)

**Website:**

<https://rockfordil.gov/city-departments/community-and-economicdevelopment/neighborhood-development/>

**PR-10 Consultation – 91.100, 91.200(b), 91.215(I)****1. Introduction**

While preparing the FY 2020-2024 Five Year Consolidated Plan and FY 2020 Annual Action Plan, the City of Rockford consulted with the Rockford Housing Authority, social service and housing agencies, faith-based organizations, economic development agencies, and the Rock River Homeless Coalition- Boone/DeKalb/Winnebago County Continuum of Care. In addition, the City prepared a resident survey through SurveyMonkey which was posted on the City's website and emailed out to the Community.

**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(I)).**

The City of Rockford works with the following agencies to enhance coordination:

- **Rockford Housing Authority & Winnebago County Housing Authority** - Section 8 Housing Choice Vouchers, improvements to public housing communities, and scattered site housing.
- **City of Rockford Department of Human Services** - the designated public Community Action Agency for Winnebago and Boone Counties. Provides services to individuals, families and neighborhoods in Rockford, as well as in greater Winnebago and Boone Counties.
- **Social Services Agencies** - provides funds to improve services to low- and moderate-income persons.
- **Housing Providers** - provides funds to rehab and develop affordable housing to improve housing options for low- and moderate-income families and individuals.
- **Rock River Homeless Coalition** - oversees the Continuum of Care funding.

These groups participate in the Planning process by attending the public hearings, consultation via phone and/or email, and stakeholder meetings.

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

The City of Rockford is committed to working with the Continuum of Care to determine the allocation of ESG program funds each year, develop the performance and evaluation standards for activities, and developing the policies and procedures related to the administration and operation of HMIS. Over the past year, the City, County, and CoC members have met and discussed the Emergency Solutions Grant (ESG) Program.

Representatives from social services, regional and local governments and housing authorities serve on the Continuum of Care Board and attend their regular monthly meetings. The Continuum of Care is consulted for each community's Annual Action Plans.

Moving forward, the City will continue to consult with the Continuum of Care to determine broad funding priorities to assist homeless persons. The CoC is part of the decision-making process for the development of the ESG program. The City will work with the Continuum of Care and will use its performance standards for projects and activities assisted by ESG funds, including reviewing the standards that the CoC has established for their subgrantees. Established CoC standards that are applicable and easily transferrable to ESG projects and activities are used in the effort to apply a standard set of criteria for various homeless funding programs. The City of Rockford will also work with the CoC, through their representation on the Homeless Advisory Board, to evaluate the outcomes of projects and activities assisted by ESG funds. Lastly, they will continue to work with the CoC to develop funding, policies, and procedures for the administration and operation of the HMIS.

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

The City of Rockford works closely with the Rock River Homeless Coalition, a local organization that administers the Continuum of Care in which the City participates. The City of Rockford receives Emergency Solutions Grant (ESG) funds as a Federal Entitlement Community. Together both organizations have developed performance standards and policies for the ESG program. This includes a policy on Rapid Rehousing Assistance, a policy on non-separation of families, and a domestic violence victim relocation policy. 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 Homeless Management Information System (HMIS) is web-based software that homeless assistance providers use to coordinate care, manage their operations, and better serve those at risk of or experiencing homelessness. Federal regulations now require all agencies offering homeless services to use HMIS, even if they are not receiving federal funds. This shared information system is the only way to ensure that the efforts of all agencies are coordinated. It is also necessary in order to have complete data by which to measure the outcomes of our efforts. Such measurements are a requirement for the community to assess its progress and to continue to receive federal funds. 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 jurisdictions consultations with housing, social service agencies and other entities**

See attached chart

**Table 2 – Agencies, groups, organizations who participated**

1.	Agency/Group/Organization	WINNEBAGO COUNTY HEALTH DEPARTMENT
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Health Agency Child Welfare Agency Other government - County Regional organization Planning organization Civic Leaders Major Employer
	What section of the Plan was addressed by Consultation?	Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs HOPWA Strategy Anti-poverty Strategy Community Development Strategy

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This agency was consulted for health needs in the community and lead based paint information.
<b>2.</b>	<b>Agency/Group/Organization</b>	<b>Rockford Public Library</b>
	<b>Agency/Group/Organization Type</b>	Services-Education Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy Community Development Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This agency was consulted to ascertain the social service and community needs in the City.
<b>3.</b>	<b>Agency/Group/Organization</b>	<b>YouthBuild</b>
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Education Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Anti-poverty Strategy Community Development Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This agency was consulted to ascertain the youth social service needs in the City.

4.	Agency/Group/Organization	Jeremiah Development, NFP
	Agency/Group/Organization Type	Housing Services - Housing Services-Education Services-Employment Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was consulted to understand regional housing and employment trends/needs and ascertain the housing and social service needs within the City.
5.	Agency/Group/Organization	Rockford Area Association of Realtors
	Agency/Group/Organization Type	Services - Housing Service-Fair Housing Regional organization Planning organization Business Leaders Major Employer
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis Fair Housing



	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Rockford Area Realtors was consulted to ascertain area Fair Housing outreach activities and homeowner and rental needs within the City.
6.	Agency/Group/Organization	ZION DEVELOPMENT CORPORATION
	Agency/Group/Organization Type	Housing Services - Housing Service-Fair Housing Regional organization Business Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Economic Development Market Analysis Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Zion Development Corporation was consulted to ascertain the housing and rental market needs within the City of Rockford.
7.	Agency/Group/Organization	Winnebago County Housing Authority
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Persons with Disabilities Services-Education Services-Employment Other government - County Regional organization Planning organization

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Anti-poverty Strategy Community Development Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Winnebago county Housing Authority was consulted to ascertain the housing and social service needs for the residents of Housing Authority Properties and in the City as a whole.
8.	<b>Agency/Group/Organization</b>	<b>HomeStart</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Service-Fair Housing Regional organization Planning organization Business Leaders Community Development Financial Institution
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Home Start was consulted to ascertain housing needs and development activities within the City.

9.	Agency/Group/Organization	ROCKFORD HOUSING AUTHORITY
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Education Services-Employment Service-Fair Housing Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Rockford Housing Authority was contacted to obtain information for the Analysis of Impediments to Fair Housing and the Five-Year Consolidated Plan.
10.	Agency/Group/Organization	Rockford Area Habitat for Humanity
	Agency/Group/Organization Type	Housing Services - Housing Services-Education Service-Fair Housing Regional organization Planning organization Business and Civic Leaders

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Market Analysis Anti-poverty Strategy Community Development Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Habitat for Humanity was consulted to ascertain the housing needs of the low-to-moderate income and disabled population in Rockford.
11.	<b>Agency/Group/Organization</b>	<b>Gorman and Company</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Regional organization Planning organization Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Economic Development Market Analysis Community Development Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Gorman and Company was consulted to learn of local community needs and housing development activities.
12.	<b>Agency/Group/Organization</b>	<b>One Body Collaboratives</b>
	<b>Agency/Group/Organization Type</b>	Regional organization Planning organization Faithbased
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	One Body Collaborative was consulted to ascertain the social service needs in the City of Rockford.
13.	Agency/Group/Organization	CARPENTERS PLACE
	Agency/Group/Organization Type	Services - Housing Services-Victims of Domestic Violence Services-homeless Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Carpenters Place was consulted to ascertain the homeless needs of the City of Rockford.
14.	Agency/Group/Organization	American Red Cross
	Agency/Group/Organization Type	Services-homeless Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The American Red Cross was consulted to ascertain the needs of the homeless community in Rockford.
15.	Agency/Group/Organization	<b>PRAIRIE STATE LEGAL SERVICES - ROCKFORD</b>
	Agency/Group/Organization Type	Service-Fair Housing Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Fair Housing
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Prairie State Legal was consulted to ascertain the Fair Housing needs and complaints of City of Rockford residents.
16.	Agency/Group/Organization	<b>REMEDIES RENEWING LIVES</b>
	Agency/Group/Organization Type	Services-homeless Services-Health Services - Victims
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Non-Homeless Special Needs Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Remedies was consulted to ascertain the needs of homeless families and victims of domestic violence in the City of Rockford.

17.	Agency/Group/Organization	SHELTER CARE MINISTRIES, INC.
	Agency/Group/Organization Type	Services - Housing Services-Children Services-homeless Correction Facilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Shelter Care was consulted to ascertain the needs of the homeless and chronically homeless individuals and families in the City of Rockford.
18.	Agency/Group/Organization	Rosecrance Ware Center
	Agency/Group/Organization Type	Services-Persons with Disabilities Services-Health Health Agency Child Welfare Agency Regional organization Business Leaders
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Rosecrance was consulted to ascertain information on individuals and families in need of health, mental health, addictions services, and recovery programs

19.	<b>Agency/Group/Organization</b>	<b>RAMP Center for Independent Living</b>
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Education Services-Employment Regional organization Planning organization Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Economic Development Community Development Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	RAMP was consulted to ascertain the reasonable accommodation needs regarding home modifications, employment, services, etc. of individuals with disabilities in the City of Rockford.
20.	<b>Agency/Group/Organization</b>	<b>Rockford Rescue Mission</b>
	<b>Agency/Group/Organization Type</b>	Services-homeless Services-Health Services-Education Services-Employment Planning organization Correction Facilities



	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy Community Development Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Rockford Rescue Mission was consulted to ascertain the needs of homeless families with children and chronically homeless individuals in the City of Rockford.
21.	<b>Agency/Group/Organization</b>	<b>Satori Pathway LLC</b>
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education Health Agency Regional organization Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Community Development Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Satori Pathway was consulted to ascertain the needs of the elderly and persons with disabilities in the City of Rockford.

22.	Agency/Group/Organization	SCORE
	Agency/Group/Organization Type	Services-Education Services-Employment Regional organization Planning organization Business Leaders
	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	SCORE was consulted to ascertain the needs of small, minority and women owned businesses in the City of Rockford and to understand the economic and market needs of the City as a whole.
23.	Agency/Group/Organization	Small Business Development Center
	Agency/Group/Organization Type	Services-Education Services-Employment Regional organization Planning organization Business Leaders
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Small Business Development Center was consulted to ascertain the needs of small, minority and women owned businesses in the City of Rockford and to understand the economic and market needs of the City as a whole.

24.	Agency/Group/Organization	Rockford Local Development Corporation
	Agency/Group/Organization Type	Services-Employment Business Leaders Community Development Financial Institution
	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Rockford Local Development Corporation was consulted to ascertain the community and economic development needs of the City of Rockford.
25.	Agency/Group/Organization	Muslim Association of Greater Rockford (MAGR)
	Agency/Group/Organization Type	Services-homeless Services-Education Regional organization Planning organization Business Leaders Civic Leaders Faithbased Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Muslim Association of Greater Rockford was consulted to ascertain the needs of the City of Rockford, particularly, the religious minority groups and immigrant/refugee populations.

26.	<b>Agency/Group/Organization</b>	<b>LifeScape Community Services</b>
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Services-Persons with Disabilities Services-Health Health Agency Regional organization Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Community Development Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	LifeScape Community Services was consulted to ascertain the needs of the elderly population and persons with disabilities in the City of Rockford.
27.	<b>Agency/Group/Organization</b>	<b>The Arc of Winnebago</b>
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Persons with Disabilities Services-Health Services-Education Services-Employment Service-Fair Housing Health Agency Regional organization Planning organization Business Leaders

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Economic Development Anti-poverty Strategy Community Development Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Arc of Winnebago was consulted to ascertain the needs of individuals with disabilities.
28.	<b>Agency/Group/Organization</b>	<b>Northwestern Illinois Area Agency on Aging</b>
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Services-Persons with Disabilities Services-Health Health Agency Regional organization Planning organization Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Community Development Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Area Agency on Aging was consulted to ascertain the needs of gaining individuals and individuals with disabilities
29.	<b>Agency/Group/Organization</b>	<b>The Workforce Connection</b>
	<b>Agency/Group/Organization Type</b>	Services-Education Services-Employment Regional organization Planning organization Business and Civic Leaders

	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Workforce Connection was consulted to ascertain the workforce development needs within the City of Rockford.
30.	<b>Agency/Group/Organization</b>	<b>Transform Rockford</b>
	<b>Agency/Group/Organization Type</b>	Planning organization Business and Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Market Analysis Community Development Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Transform Rockford was consulted to ascertain current and future community and economic development needs and activities occurring in the City of Rockford.

31.	Agency/Group/Organization	CITY OF ROCKFORD
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless Services-Health Services-Education Service-Fair Housing Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management Other government - Local Planning organization Civic Leaders Correction Facilities Grantee Department Major Employer
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs HOPWA Strategy Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City of Rockford Departments and staff were consulted on the housing, homeless, special needs, market analysis, economic development, lead-based paint, anti-poverty, and community development needs. In addition, the City staff was consulted on the Hazard Mitigation Strategies.
<b>32.</b>	<b>Agency/Group/Organization</b>	<b>Xfinity</b>
	<b>Agency/Group/Organization Type</b>	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Regional organization Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Community Development Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Xfinity/Comcast was consulted on Broadband and Digital Divide strategies.
<b>33.</b>	<b>Agency/Group/Organization</b>	<b>Illinois Department of Commerce and Economic Opportunity</b>
	<b>Agency/Group/Organization Type</b>	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Other government - State Regional organization Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Community Development Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The State of Illinois Department of Commerce and Economic Development Broadband Expansion-Rebuild Illinois plan was consulted on Broadband and Digital Divide strategies.



34.	<b>Agency/Group/Organization</b>	Boone-Winnebago Regional Office of Education
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Education Regional organization Planning organization Business Leaders Schools Major Employer
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Anti-poverty Strategy Community Development Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Boone-Winnebago Regional Office of Education was consulted to ascertain educational needs in the City of Rockford.
35.	<b>Agency/Group/Organization</b>	Rock River Homeless Coalition
	<b>Agency/Group/Organization Type</b>	Services-homeless Services - Victims Regional organization Planning organization Civic Leaders Correction Facilities

<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy Community Development Strategy
<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Rock River Homeless Coalition was consulted to ascertain the needs of homeless in the City of Rockford.

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

All agency types were consulted and contacted during the planning process. See Exhibit section for meeting notes.

### 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	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
City of Rockford Comprehensive Plan	City of Rockford, Community and Economic Development Department	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
Analysis of Impediments to Fair Housing Choice	City of Rockford, Community and Economic Development Department	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
Lead Safe Rockford Lead Facts	Winnebago County Health Department	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Broadband Expansion-Rebuild Illinois	Illinois Department of Commerce	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
Resiliency Plan	City of Rockford	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.
City of Rockford Zoning Ordinance	City of Rockford	They are incorporated in the Five Year Consolidated Plan and the Annual Action Plans.

Table 3 – Other local / regional / federal planning efforts

**Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))**

The City of Rockford Community and Economic Development Department administers the CDBG, HOME, and ESG program. Close coordination is maintained with the other City departments including Public Works Department, Police Department, Department of Human Service, and Fire Department to address infrastructure, housing, code enforcement, public services, homeless services, and public safety needs.

The City held two (2) public hearings during the Five-Year Consolidated Plan and Annual Action Plan development process. At the public hearings, residents (including low-income persons and low-income representatives) were asked for input concerning Federal funds in the existing Neighborhoods as well as areas of need in general for the City. The online electronic survey asked responders to identify the housing and community development needs in their neighborhood and if there were other areas that needed to be focused on in the City. During consultation with stakeholders which included community groups, the Housing Authority, and City departments, the question was asked regarding CDBG, HOME, and ESG investment in the community. The City has currently designed a Neighborhood Revitalization Strategy Area (NRSA) that is predominantly residential and made up of low-and moderate-income residents.

**PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)****1. Summary of citizen participation process/Efforts made to broaden citizen participation  
Summarize citizen participation process and how it impacted goal-setting**

The FY 2020-2024 Consolidated Plan and FY 2020 Annual Action Plan have many components which try to reach out and encourage citizen participation. These components are the following: interviews and roundtable discussions were held with various stakeholders; two (2) needs hearing; and two (2) hearings to gather public comments on the draft plans on public display. The City also prepared a resident survey form which it posted on the City's website, and at strategic locations, and sent out via email to agencies and organizations across the City. The City received back 505 completed resident surveys. All of these comments are included in the Five-Year Consolidated and Annual Action Plan in the Exhibit Section. Through the citizen participation process, the City uses citizen input to develop how the plan will serve the low- and moderate-income population to reach the goals set forth in the Five Year Consolidated Plan.

The 2020-2024 Citizen Participation Plan (CPP) was adopted for development of the FY 2020-2024 Five Year Consolidated Plan and FY 2020 Annual Action Plan. A copy of the Citizen Participation Plan effective January 1, 2020 is included in the Appendix.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1.	Newspaper Ad	Minorities  Persons with disabilities  Non-targeted/ broad community  Residents of Public and Assisted Housing  Citywide	None.	None.	None.	Not Applicable.

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.	Public Meeting	Minorities  Persons with disabilities  Non-targeted/ broad community  Residents of Public and Assisted Housing  Agencies/ Organizations	Two Needs Public Hearings were held. The meetings were held on Tuesday, July 9, 2019 at 6:00 PM and Wednesday, July 10, 2019 at 1:00 PM to discuss the needs over the next five years. A total of 31 were in attendance.	Meeting minutes can be found in the appendix section of this Five-Year Consolidated Plan.	None.	Not Applicable.



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3.	Stakeholders Meetings	Minorities Persons with disabilities Non-targeted/ broad community Residents of Public and Assisted Housing Agencies/ Organizations	The City met with 37 agencies/organizations as part of its stakeholders and individual meetings.	A summary of the meeting minutes can be found in the appendix section of Five Year Consolidated Plan.	All comments were accepted.	Not Applicable.

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)
4.	Stakeholders Meetings	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/ broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Citywide</p>	Placed the Resident Survey on the City's website and emailed surveys to agencies/ organizations, public and housing authority to pass out. Copies were available at City Hall. Surveys were mailed to housing program participants. Surveys were available at the National Night Out and other various community events. Surveys were shared on the City's Facebook page, NextDoor, and links were included in some staff email signatures.	The City received back 505 resident surveys. The tabulations of the Resident Surveys are in the Exhibit section of this Five-Year Consolidated Plan.	All comments were accepted.	<a href="https://www.surveymonkey.com/s/RockfordCity">https://www.surveymonkey.com/s/RockfordCity</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5.	Stakeholders Meetings	Minorities Persons with disabilities Non-targeted/ broad community Residents of Public and Assisted Housing Agencies/ Organizations	The agency/ organization surveys were sent out to agencies/ organizations in the City.	A summary of the survey responses and meeting minutes can be found in the appendix section of this Five-Year Consolidated Plan.	All comments were accepted.	Not Applicable.

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)
6.	Internet Outreach	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/ broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Citywide</p>	<p>Links to the resident survey and notices of the public hearings were published on the City of Rockford's Facebook page on July 3, 2019 and August 22, 2019.</p>	None.	None.	<p><a href="https://www.facebook.com/CityofRockford/posts/10157612887364533">https://www.facebook.com/CityofRockford/posts/10157612887364533</a></p> <p><a href="https://www.facebook.com/CityofRockford/posts/10157484882399533">https://www.facebook.com/CityofRockford/posts/10157484882399533</a></p>

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)
7.	Newspaper Ad	Minorities  Persons with disabilities  Non-targeted/ broad community  Residents of Public and Assisted Housing  Citywide	None.	None.	None.	Not Applicable.

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)
8.	Public Meeting	Minorities  Persons with disabilities  Non-targeted/ broad community  Residents of Public and Assisted Housing  Agencies/ Organizations	Two Public Hearings were held. The meetings were held on December 16 and 18, 2019.	Meeting minutes can be found in the appendix section of this Five-Year Consolidated Plan.	None.	Not Applicable.



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)
9.	Internet Outreach	Minorities Persons with disabilities Non-targeted/ broad community Residents of Public and Assisted Housing Citywide	Links to the resident survey and notices of the public hearings were published on the City of Rockford's Facebook page.	None.	None.	<a href="https://rockfordil.gov/city-departments/community-and-economicdevelopment/cedd-reports/">https://rockfordil.gov/city-departments/community-and-economicdevelopment/cedd-reports/</a>

Table 4 – Citizen Participation Outreach

## Needs Assessment

### NA-05 Overview

#### Needs Assessment Overview

The City of Rockford used the HUD Comprehensive Housing Affordability Strategy (CHAS) data to provide statistical data on housing needs, to prepare its estimates and projects. The tables in this section have been prepopulated with HUD data sets based on the American Community Survey (ACS) five year estimates, and the 2009 U.S. Census. This data is the most current information available to assess housing needs, homeless needs, special needs, social service needs, economic development needs, etc.

The CHAS data provides a summary of the number of households in each income category by tenure, household type, and the percentage of households that have a housing problem, as defined by HUD. The CHAS data is summarized and sorted by a household's income category to determine the extent to which a household within each category is cost overburdened, severely cost overburdened, and/or living in substandard housing; the data is further broken down to show the extent to which such problems impact minority households.

The City of Rockford defines "standard condition" as the condition of a housing unit that meets the City of Rockford's building code standards: "Local Amendments to 2015 ICC [IPMC] International Property Maintenance Code." The City defines "substandard condition suitable for rehabilitation" as the condition of a housing unit that fails to meet the City's building code standards, but the cost to rehabilitate the housing unit up to code standards is less than the fair market value of the housing unit after the rehabilitation work is completed. In addition, the City of Rockford uses the 2015 IPMC to determine what constitutes a code violation. The number of code violations is used to identify deteriorating and deteriorated properties. The prevalence of poorly maintained housing, as well as retail and commercial properties with multiple code violations, define an area as deteriorating or deteriorated. Additional factors that contribute to this definition of "deteriorating" include: multiple vacant and boarded properties, properties with poorly maintained yards and garbage, the presence of rodents and insects due to poor building maintenance and unsanitary conditions, and dilapidated garages and outbuildings.

Rockford is part of the Boone, DeKalb, and Winnebago County Continuum of Care. Data for the development for the homeless needs section was obtained from the Continuum of Care.

Additional needs for the City of Rockford were obtained from input and interviews with various social service agencies, housing providers, city staff, and survey responses.

## NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

### Summary of Housing Needs

The most recent population data comes from the 2013-2017 ACS, and the most recent cost burden data is derived from the 2011-2015 CHAS data set. Based on a comparison between the 2010 and 2017 (the most recent available data) population, the City of Rockford had an 3.8% decrease in its population. The population decrease was 5,877 persons and 2,436 households. Furthermore, the median income of the area increased by 1%. This increase in median income represents a change in nominal dollars and not a change in real dollars. In order to calculate the change in real dollars, the Consumer Price Index is used to calculate the inflation rate for a given period. Between 2009 and 2015, the cumulative inflation rate was approximately 10.48%, meaning that the \$38,486.00 median income in 2009 would be \$42,518.71 if it were expressed in 2015 dollars. By taking into consideration the rate of inflation, the median income in Rockford has not kept up with the rate of inflation.

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	152,871	150,285	-2%
Households	60,165	58,560	-3%
Median Income	\$38,486.00	\$38,716.00	1%

**Table 5 - Housing Needs Assessment Demographics**

**Data Source:** 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

### Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	11,310	8,470	11,025	5,940	21,810
Small Family Households	3,935	3,055	3,840	2,260	10,470
Large Family Households	1,195	575	1,070	665	1,580
Household contains at least one person 62-74 years of age	1,410	1,770	2,650	1,355	4,845
Household contains at least one person age 75 or older	1,030	1,760	1,700	729	2,035
Households with one or more children 6 years old or younger	3,219	1,409	2,060	1,115	1,994
* the highest income category for these family types is >80% HAMFI					

**Table 6 - Total Households Table**

**Data Source:** 2011-2015 CHAS

**Housing Needs Summary Tables****1. Housing Problems (Households with one of the listed needs)**

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	205	155	155	55	570	65	40	0	15	120
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	190	60	95	140	485	50	20	15	45	130
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	325	75	129	60	589	10	65	125	20	220
Housing cost burden greater than 50% of income (and none of the above problems)	5,125	1,245	159	15	6,544	1,630	1,075	585	120	3,410

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	775	2,355	1,630	144	4,904	294	1,045	1,725	655	3,719
Zero/negative Income (and none of the above problems)	1,170	0	0	0	1,170	280	0	0	0	280

Table 7 – Housing Problems Table

Data 2011-2015 CHAS  
Source:

## 2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	5,845	1,535	545	270	8,195	1,755	1,205	730	195	3,885
Having none of four housing problems	1,725	3,610	4,480	2,025	11,840	539	2,120	5,275	3,450	11,384
Household has negative income, but none of the other housing problems	1,170	0	0	0	1,170	280	0	0	0	280

Table 8 – Housing Problems 2

Data 2011-2015 CHAS  
Source:

**3. Cost Burden > 30%**

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	2,675	1,610	675	4,960	515	749	850	2,114
Large Related	770	195	110	1,075	200	205	215	620
Elderly	809	935	604	2,348	740	1,005	794	2,539
Other	2,230	1,090	499	3,819	564	239	464	1,267
Total need by income	6,484	3,830	1,888	12,202	2,019	2,198	2,323	6,540

**Table 9 – Cost Burden > 30%**

Data 2011-2015 CHAS

Source:

**4. Cost Burden > 50%**

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	2,350	520	25	2,895	440	450	120	1,010
Large Related	655	40	0	695	160	100	30	290
Elderly	584	430	150	1,164	630	425	230	1,285
Other	2,005	375	49	2,429	495	129	210	834
Total need by income	5,594	1,365	224	7,183	1,725	1,104	590	3,419

**Table 10 – Cost Burden > 50%**

Data 2011-2015 CHAS

Source:

**5. Crowding (More than one person per room)**

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	505	100	189	165	959	45	85	65	55	250
Multiple, unrelated family households	39	10	35	14	98	10	0	75	4	89

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Other, non-family households	0	30	0	20	50	0	0	0	0	0
Total need by income	544	140	224	199	1,107	55	85	140	59	339

Table 11 – Crowding Information – 1/2

Data Source: 2011-2015 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source  
Comments:

### Describe the number and type of single person households in need of housing assistance.

According to the 2011-2015 American Community Survey (ACS), there were 58,560 households in 2015 in the City of Rockford. Based on this number of households, 19,247 (32.87%) of all households were single person households living alone. Single person households aged 65 and over comprised 6,731 households or (11.5%) of all households. Based on the 2011-2015 American Community Survey (ACS) estimates, 37.5% of all persons living alone are seniors, and it is presumed that as they age in place, additional accommodations and supportive services will be necessary for this portion of the City's population. The City will need to assist in obtaining funding and collaborating with housing service and elderly support agencies to provide programs, activities, and accommodations for its elderly population.

### Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

- **Disabled Population** – A total of 23,224 (15.5% of the population) individuals have a disability. Of those individuals who have a disability: 24.03% have a hearing difficulty; 19.87% have a vision difficulty; 6.10% have a cognitive difficulty; 55.65% have an ambulatory difficulty; 23.5% have a self-care difficulty; and 39.93% have an independent living difficulty.
- **Domestic Violence, dating violence, sexual assault, and stalking** – based on the local crime statistics and the Lethality Assessment Program reports from November 1, 2017- June 30, 2019, 3,110 phone calls were made to the domestic violence hotline. According to Rockford police



reports, 59% (3,358) of victims were determined to be in “High Danger” of being killed by an intimate partner. Rockford police officers helped connect victims to 750 instances of service. The number of violent crimes, many related to domestic violence, has decreased by 20% from the reporting years January 2018- June 2018 and January 2019-June 2019.

### **What are the most common housing problems?**

The largest housing problem in the City of Rockford is housing affordability, housing rehab, and abundance of vacant structures/blight. According to the 2011-2015 American Community Survey data, 49.3% of all renter households are cost overburdened by 30% or more, and 36.8% of all owner households are cost overburdened by 30% or more.

In consultations, interviews and surveys, a deteriorating and aging housing stock is the largest housing problem in the City. Rehabilitation costs are too high for most homeowners and landlords and the rate of return is too low for owners and landlords to make investments in improvements. Lack of affordable accessible housing and reasonable accommodation for individuals with disabilities is another larger unmet housing need and problem. Much of the City's mid-century modern housing stock is designated as historic residential structures and there are regulatory and cost barriers to making accommodation improvements.

There is a lack of safe, decent, sanitary, and affordable housing for the homeless or those in transition. This is an issue of a gap in services and affordability for housing.

### **Are any populations/household types more affected than others by these problems?**

Yes, the elderly and disabled populations are the most affected by the high cost of housing in the City of Rockford. The elderly and disabled are on fixed or limited incomes. The lack of affordable housing that is decent, safe, and sound forces them into housing that does not meet code standards.

The other large group affected by the lack of affordable housing is the homeless and persons at-risk of becoming homeless, including persons who are victims of domestic violence. Those fleeing domestic violence often find themselves in situations where they can no longer afford their housing and cannot find safe, decent, sound, or affordable housing to move into and are forced into temporary shelter or overcrowded conditions.

**Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

The Rock River Homeless Coalition serves as the Continuum of Care (CoC) for Boone, DeKalb, and Winnebago Counties and is comprised of 27 agency members. The CoC utilizes a Housing First model which is coordinated through the Coordinated Entry System.

The CoC also utilizes Rapid Rehousing and Transitional housing methods to prevent an individual or family from becoming homeless. Members of the CoC offer various programs offer short term rental assistance for eviction prevention, security deposit funding, short (3-6 months) and long (up to two years) term transitional housing, and case management for extended assistance and services.

According to stakeholder interviews and round table discussions, members of the coalition in the Rockford area (Winnebago County) have seen an increase in the aging homeless population as it is difficult for the elderly and elderly with special care needs to afford the ability to age in place. Many aging seniors, especially those with mental illness and disabilities see a gap in services by being too young to qualify for assisted living and in-home services. Conversely, seniors over the qualifying age are finding themselves at great risk of becoming homeless because they cannot afford the cost of maintaining their homes. The lack of maintenance wears on a home and seniors are often advised and even forced to leave to due to unsafe conditions and health code violations.

Individuals and families of low and extremely low income struggle to prevent themselves from becoming homeless but are not eligible for many of the services provided by the CoC because they do not fall under their definition of "homeless". Individuals and families face a dilemma of struggling to prevent their own homelessness or become homeless to receive the benefits of social services.

According to stakeholder interviews and roundtable discussions, individuals and families who are homeless and/or low and extremely low income often face difficulties in finding a landlord who is willing to rent to them. Stakeholders also indicated that not all landlords are willing to accept Housing Choice Vouchers or other forms of financial assistance, such as security deposits, from social service agencies.

According to stakeholder interviews, it takes approximately 91 days for a person who has become homeless to be permanently housed again. The goal for the CoC is 31 days.

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

Not Applicable.

**Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

According to the 2011-2015 ACS data, 49.3% of all renter households are cost overburdened by 30% or more, and 36.8% of all owner households are cost overburdened by 30% or more.

There is an abundance of vacant and blighted property and an increasing need for housing rehab for existing rental and owner properties in the City of Rockford. There is not a desirable rate of return on rehabilitating a rental property and property owners, out of town landlords especially, will often let a building fall into disrepair until it is condemned and demolished. Tenants are reluctant to report code violations in fear of being evicted and becoming homeless. These tenants are at a high risk of becoming homeless because they are unable to find safe, decent, and sanitary housing, and are ineligible for most homeless social services until they are “officially” homeless. The decision to be homeless may be seen as a risk worth taking in order to get into safe, decent, sanitary, and affordable housing. Low income homeowners are often unable to afford basic repairs to their home which eventually turn into larger structural problems and are then forced to leave their home due to building and health code violations.

There has been a limited number of new housing units built since the housing market crash in 2008 and individuals and developers are hesitant to build new housing units due to the cost of housing and rate of return on investment. According to 2013-2017 American Community Survey data, approximately 63% of the City’s current housing stock was built prior to 1969.

Additionally, there is a general lack of homeownership opportunities for single family homes; these homes are often purchased by landlords and rented as single or multi-family units until they are unlivable. Many landlords are also unwilling to accept Housing Choice Vouchers from potential tenants.

## **Discussion**

Not Applicable.

## NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

*Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.*

### Introduction

During the planning process for the preparation of the City of Rockford's Five Year Consolidated Plan, an evaluation and comparison was made to determine if any racial or ethnic group is disproportionately affected by housing problems in the City. Disproportionately greater need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole. According to the 2011-2015 American Community Survey, the total number of White Households in the City of Rockford is 42,561 households (72.7%); its number of Black/African American Households is 11,212 households (19.1%); its number of Asian Households is 1,457 households (2.5%); and its number of Hispanic Households is 6,918 households (11.8%).

### 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	8,670	1,199	1,450
White	4,020	729	605
Black / African American	3,020	320	635
Asian	159	40	30
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	1,340	90	165

**Table 13 - Disproportionally Greater Need 0 - 30% AMI**

Data 2011-2015 CHAS  
Source:

*\*The four housing problems are:*

*1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%*

**30%-50% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,140	2,335	0
White	3,380	1,530	0
Black / African American	1,560	500	0
Asian	125	14	0
American Indian, Alaska Native	15	0	0
Pacific Islander	0	0	0
Hispanic	965	230	0

**Table 14 - Disproportionally Greater Need 30 - 50% AMI**

Data 2011-2015 CHAS  
Source:

*\*The four housing problems are:*

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**50%-80% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,625	6,400	0
White	3,085	4,005	0
Black / African American	750	1,055	0
Asian	64	74	0
American Indian, Alaska Native	0	30	0
Pacific Islander	0	0	0
Hispanic	700	1,070	0

**Table 15 - Disproportionally Greater Need 50 - 80% AMI**

Data 2011-2015 CHAS  
Source:

*\*The four housing problems are:*

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**80%-100% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,270	4,680	0
White	719	3,075	0
Black / African American	330	810	0
Asian	19	180	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	179	585	0

**Table 16 - Disproportionally Greater Need 80 - 100% AMI**

Data 2011-2015 CHAS  
Source:

*\*The four housing problems are:*

*1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%*

**Discussion**

The racial composition of households in the City of Rockford, according to the 2011-2015 American Community Survey, the total number of White Households in the City of Rockford is 42,561 households (72.7%); its number of Black/African American Households is 11,212 households (19.1%); its number of Asian Households is 1,457 households (2.5%); and its number of Hispanic Households is 6,918 households (11.8%).

There is only one racial/ethnic group disproportionately affected by housing problems: among those earning 0-30% AMI, the Black/African American racial group makes up 34.8% of those with one or more housing problems.

## NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

*Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.*

### Introduction

During the planning process for the preparation of the City of Rockford's Five Year Consolidated Plan, an evaluation and comparison was made to determine if any racial or ethnic group is disproportionately affected by severe housing problems in the City. Disproportionately greater need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole. Data detailing information by racial group and Hispanic origin has been compiled from the 2011-2015 CHAS data and the 2010 U.S. Census. Disproportionate need is defined as a group having at least 10 percentage points higher than the percentage of persons in that group as a whole. The following tables illustrate the disproportionate needs of the City of Rockford.

### 0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,600	2,264	1,450
White	3,525	1,225	605
Black / African American	2,635	709	635
Asian	144	55	30
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	1,175	250	165

**Table 17 – Severe Housing Problems 0 - 30% AMI**

Data 2011-2015 CHAS  
Source:

*\*The four severe housing problems are:*

*1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%*



**30%-50% of Area Median Income**

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,740	5,730	0
White	1,485	3,425	0
Black / African American	685	1,385	0
Asian	55	80	0
American Indian, Alaska Native	0	15	0
Pacific Islander	0	0	0
Hispanic	494	685	0

**Table 18 – Severe Housing Problems 30 - 50% AMI**

Data 2011-2015 CHAS  
Source:

*\*The four severe housing problems are:*

*1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%*

**50%-80% of Area Median Income**

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,275	9,755	0
White	784	6,305	0
Black / African American	155	1,645	0
Asian	34	109	0
American Indian, Alaska Native	0	30	0
Pacific Islander	0	0	0
Hispanic	295	1,480	0

**Table 19 – Severe Housing Problems 50 - 80% AMI**

Data 2011-2015 CHAS  
Source:

*\*The four severe housing problems are:*

*1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%*

**80%-100% of Area Median Income**

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	465	5,475	0
White	265	3,525	0
Black / African American	90	1,045	0
Asian	8	190	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	100	670	0

**Table 20 – Severe Housing Problems 80 - 100% AMI**

Data 2011-2015 CHAS  
Source:

*\*The four severe housing problems are:*

*1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%*

**Discussion**

The racial composition of households in the City of Rockford, according to the 2011-2015 American Community Survey, the total number of White Households in the City of Rockford is 42,561 households (72.7%); its number of Black/African American Households is 11,212 households (19.1%); its number of Asian Households is 1,457 households (2.5%); and its number of Hispanic Households is 6,918 households (11.8%).

The racial/ethnic groups disproportionately affected by housing problems are as follows: among those earning 0-30% AMI, the Black/African American racial group makes up 34.7% of those with housing problems. Of those in the 50-80% AMI bracket, 12.2% of Black/African American households and 38.7% of Hispanic households are disproportionately affected by housing problems in that group. Of those in the 80-100% AMI bracket, 21.5% of the Hispanic population makes up those disproportionately affected by housing problems.

## NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

*Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.*

### Introduction:

During the planning process for the preparation of the City of Rockford's Five Year Consolidated Plan, an evaluation and comparison was made to determine if any racial or ethnic group is disproportionately affected by housing problems in the City. Disproportionately greater need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole.

The greatest housing problem facing the City of Rockford, IL is the lack of affordable housing and blighting and unsafe housing conditions. In addition to the unsafe housing conditions several of the City's lower income residents are deeply cost overburdened and paying 30% or more on housing related costs. The following information was noted: 5,975 white households were cost overburdened between 30-50%; 5,640 white households were cost overburdened by 50% or greater. 2,285 Black/African American households were cost overburdened by 30-50%, and 3,280 Black/African American households were cost overburdened by 50% or greater. Lastly, 1,320 Hispanic households were cost overburdened by 30-50% and 1,540 were cost overburdened by 50% or greater.

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	36,234	9,960	10,804	1,565
White	25,875	5,975	5,640	640
Black / African American	4,875	2,285	3,280	690
Asian	1,030	180	215	30
American Indian, Alaska Native	90	15	4	0
Pacific Islander	0	0	0	0
Hispanic	3,870	1,320	1,540	190

**Table 21 – Greater Need: Housing Cost Burdens AMI**

Data Source: 2011-2015 CHAS

### Discussion:

A total of 5,975 White households were considered cost overburdened between 30% and 50%, which is 60% of the total cases of households that were considered cost overburdened by between 30% and

50%. This number is below the 72.7% of the total number of White households in the City. A total of 2,285 Black/African American households were considered cost overburdened by between 30% and 50%, which is 22.9% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is slightly higher than the 19.1% of the total number of households that the Black/African American category comprises. A total of 180 Asian households were considered cost overburdened by between 30% and 50%, which is 1.8% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is below the 2.5% of the total number of households the Asian category comprises. A total of 1,320 Hispanic households were considered cost overburdened between 30% and 50%, which is 13.25% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is above the 11.8% of the total number of households that the Hispanic category comprises.

A total of 5,640 White households were considered cost overburdened by greater than 50%, which is 52.2% of the total cases of households that were considered cost overburdened by greater than 50%. This number is below the 72.7% of the total number of households that the White category comprises. A total of 3,280 Black/African American households were considered cost overburdened by greater than 50%, which is 30.3% of the total cases of households that were considered cost overburdened by greater than 50%. This number is higher than the 19.1% of the total number of households that the Black/African American category comprises. A total of 215 Asian households were considered cost overburdened by between 30% and 50%, which is 1.99% of the total cases of households that were considered cost overburdened by between 30% and 50%. This number is slightly lower than the 2.5% of the total number of households the Asian category comprises. A total of 1,540 Hispanic households were considered cost overburdened by greater than 50%, which is 14.2% of the total cases of households that were considered cost overburdened by greater than 50%. This number is slightly higher than the 11.8% of the total number of households that the Hispanic category comprises.

**NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)****Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

The racial composition of households in the City of Rockford, according to the 2011-2015 American Community Survey, the total number of White Households in the City of Rockford is 42,561 households (72.7%); its number of Black/African American Households is 11,212 households (19.1%); its number of Asian Households is 1,457 households (2.5%); and its number of Hispanic Households is 6,918 households (11.8%).

There is only one racial/ethnic group disproportionately affected by housing problems: among those earning 0-30% AMI, the Black/African American racial group makes up 34.8% of those with housing problems.

There are two racial/ethnic groups across categories that are affected by severe housing problems are as follows: among those earning 0-30% AMI, the Black/African American racial group makes up 34.7% of those with housing problems. Of those in the 50-80% AMI bracket, 12.2% of Black/African American households and 38.7% of Hispanic households are disproportionately affected by housing problems in that group. Of those in the 80-100% AMI bracket, 21.5% of the Hispanic population makes up those disproportionately affected by housing problems.

One racial/ethnic group is disproportionately considered cost overburdened by greater than 50%. A total of 3,280 Black/African American households were considered cost overburdened by greater than 50%, which is 30.3% of the total cases of households that were considered cost overburdened by greater than 50%. This number is disproportionately higher than the 19.1% of the total number of households that the Black/African American category comprises.

However, when examining the percentage of each race or ethnic group with a housing problem or a severe housing problem, a different picture presents itself. 46% of all Hispanics experienced a housing problem, while 50.4% of Black/African Americans, 26.3% of Whites, and 25% of Asians experienced one. These numbers are even more skewed for severe housing problems, with 31.7% of Black/African Americans, 29.8% of Hispanics, 14.2% of Whites, and 16.5% of Asians experiencing severe housing problems. These numbers show that if you are Black/African American or Hispanic, you are more likely to experience a housing problem. These numbers also show that if you are Black/African American you are more likely to experience a severe housing problem than you are if you identify as any other racial or ethnic group.

**If they have needs not identified above, what are those needs?**

There are no additional needs that have not been identified above.

**Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

According to the 2013-2017 American Community Survey, Census Tracts 10, 21, 24, 25, 27, and 28 have minority concentrations of 69.1% or greater. However, it is not clear if these Census Tracts are more or less cost overburdened or have more severe housing problems compared to other areas in the City.

## NA-35 Public Housing – 91.205(b)

### Introduction

The Rockford Housing Authority is the public housing agency that serves the City of Rockford. The Housing Authority owns and manages 6,659 units of public housing, of which 570 units are elderly or disabled only and 1,316 units are family. The Rockford Housing Authority administers 1,862 Section 8 Housing Choice Vouchers. According to the Rockford Housing Authority Capital Fund Grant, the goals of the Housing Authority are the following:

- To reduce dependency on HUD grant funds
- Bring in sufficient funds from grants, consulting, training, and/or other activities each year to fully support operations-includes fee for service with RHA
- Streamline and improve the process of identifying and applying for funds
- Increase the percentage of Bridge and RHA residents that are served by RSD
- To promote independence and self-sufficiency for residents by working in partnership with communities and local agencies to provide a continuum of service provisions to residents. The Rockford Housing Authority will build upon programs offered to clients while collaborating with community partners to provide all around services

### Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	341	1,597	1,425	0	1,410	0	0	0

Table 22 - Public Housing by Program Type

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

**Characteristics of Residents**

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project-based	Tenant-based	Special Purpose Voucher Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	8,078	8,944	10,977	0	10,874	0	0
Average length of stay	0	3	5	6	0	5	0	0
Average Household size	0	1	2	2	0	2	0	0
# Homeless at admission	0	3	7	0	0	0	0	0
# of Elderly Program Participants (>62)	0	113	223	170	0	170	0	0
# of Disabled Families	0	64	477	453	0	451	0	0
# of Families requesting accessibility features	0	341	1,597	1,425	0	1,410	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

**Table 23 – Characteristics of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)



**Race of Residents**

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	179	561	340	0	337	0	0	0
Black/African American	0	161	1,019	1,072	0	1,061	0	0	0
Asian	0	0	10	1	0	1	0	0	0
American Indian/Alaska Native	0	0	6	10	0	9	0	0	0
Pacific Islander	0	1	1	2	0	2	0	0	0
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

**Table 24 – Race of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

**Ethnicity of Residents**

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	11	52	46	0	44	0	0	0
Not Hispanic	0	330	1,545	1,379	0	1,366	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

**Table 25 – Ethnicity of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

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**Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:**

The following accessible unit needs of the public housing tenants and applicants are:

- The Public Housing program currently has a waiting list of 4,736 unduplicated applications. The waiting period for public housing applicants is estimated at one to six months depending on the family size
- More accessible units; currently 11.2% of all public housing units are accessible with no current plans to add more.
- More units that can be easily adapted to make them accessible-primarily wheelchair ramps
- More accessible pathways and entry ways, and fewer steps
- More repairs made to raised sidewalks to make them more level and even
- Close and adequate public transportation within a short distance of the accessible units
- Close and adequate amenities (i.e. grocery stores, medical facilities, etc.) within a short distance of the accessible units

**Most immediate needs of residents of Public Housing and Housing Choice voucher holders**

- **Lack of quality affordable housing and Landlords** - There's a demand for Housing Choice Voucher Landlords that provide decent, safe, and sanitary housing. Landlords see risk in renting to low income individuals and families and do not want to wait for payments from HUD. Many tenants in housing are hesitant to report housing violations in fear of being evicted and not being able to find alternate housing.
- **Voucher payment standards are too low** – Area Median Income has decreased in recent years and rental rates have increased. Many neighborhoods in Rockford are becoming less affordable and thus limiting areas for low income populations. Often, even if a voucher is awarded the voucher payment standard can be too low to afford the unit.
- **Limited resources for landlords who do accept vouchers**- Several landlords have expressed concern that HUD does not pay for damage done to housing units. Landlords see this, and low voucher payments, as an income loss and do not want to maintain or update their units to appropriate standards leaving tenants to live in unsafe and unsanitary conditions.

**How do these needs compare to the housing needs of the population at large**

The population at large generally sees the same problems with rental and owner housing within community. An abundance of properties are in disrepair and landlords are reluctant to make repairs to bring the building up to code; whereas homeowners are unable to afford general repairs which then turn into larger problems in the long run. It is estimated that a total of 500-700 buildings need to be demolished.

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Tenants and homeowners are wary of reporting code violations in fear they will be evicted or forced to leave their home. Stakeholders have expressed that rents have increased, making it difficult to find affordable housing that is decent, safe, and sanitary. There is a need to rehabilitate existing rental and owner property but the expense for repairs to not have a favorable rate of return for landlords and homeowners.

Elderly populations and people with disabilities want to stay in their homes but generally do not have access to the monetary means to make their homes accessible by removing architectural barriers or building ramps for access to their home. Landlords will ignore requests for reasonable accommodation and a tenant's fear of eviction prevents them from reporting this violation. Agencies will often finance projects for ramps and other accommodations for the elderly and people with disabilities.

Victims of domestic violence often find themselves struggling to find housing that is decent, safe, and sanitary for themselves and their family. Victims are fearful of reporting violence in the home in fear of eviction for being a "nuisance" property.

There is a general lack of opportunities for homeownership, especially for low income persons. Many available properties are purchased by landlords and are subdivided and converted to rental units.

## **Discussion**

Not Applicable.

## NA-40 Homeless Needs Assessment – 91.205(c)

### Introduction:

The Rock River Homeless Coalition Continuum of Care (CoC) is the regional organization from the three (3) counties that was formed to address the needs of the homeless in Boone, DeKalb, and Winnebago Counties. The CoC consists of 27 agency members and one (1) individual member. Members of the CoC include representatives from the Rockford Housing Authority, legal assistance providers, various adult and youth social services agencies. Services are provided to homeless individuals and families through the HMIS case management system. Case managers work directly with the clients to identify the specific needs and challenges facing the homeless. Case managers refer them to the necessary support and housing services.

### Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	73	0	95	139	0	73
Persons in Households with Only Children	161	0	41	212	0	161
Persons in Households with Only Adults	0	0	0	61	0	0
Chronically Homeless Individuals	0	0	15	95	0	0
Chronically Homeless Families	4	0	0	0	0	4
Veterans	73	0	95	139	0	73

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Unaccompanied Child	161	0	41	212	0	161
Persons with HIV	0	0	0	61	0	0

**Table 26 - Homeless Needs Assessment****Data Source**

**Comments:** Data provided from the Rock River Homeless Coalition

<b>Indicate if the homeless population is:</b>	Has No Rural Homeless
--	-----------------------

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Not Applicable.

**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
White	161	27
Black or African American	177	14
Asian	3	0
American Indian or Alaska Native	2	1
Pacific Islander	0	0
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
Hispanic	39	1
Not Hispanic	319	44

Data Source

Comments:

Data provided from the Rock River Homeless Coalition

**Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.**

The CoC has reached a “functional zero” for veterans. For households with children, the Point in Time Counts estimates that there are 50 households with at least one (1) child in emergency or transitional housing. In meetings, individuals and those who serve homeless populations expressed a need for services for those who are on the brink of becoming homeless and the need for affordable housing for those in need of housing. In order for individuals and families to receive services from the CoC, they must be “officially” designated as homeless. There are many families and individuals living in unsafe and dilapidated housing conditions who cannot receive services due to the lack of “homeless” designation.

There are an estimated 2400 children that are homeless within the Rockford School District. However, children are usually staying with other family members or with friends and are “couch surfing”-they are still sheltered but not at their parents’ address. Point in time counts indicate there are a minimal number of sheltered and unsheltered youth with their families.

**Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.**

A total of 304 households have experienced homelessness according to the Point-In-Time counts for 2019. Of those households, 202 are in emergency shelter, 59 are in transitional shelter and 43 are unsheltered.

There are 403 persons experiencing homelessness, this is inclusive of youth under 18, persons 18-24 and persons over age 24. Of those experiencing homelessness, 261 are in emergency shelters, 97 are in transitional, and 45 are unsheltered.

Of the 403 persons experiencing homelessness 31% are white, 47% are Black/African American; 0.74% are Asian; 0.74% are American Indian or Alaskan Native; and 4.5% are Multiple Races.

A total of 97 youth under the age of 18 experience homelessness according to the 2019 Point-In-Time counts. Of those 97 youth, 59 are in emergency shelter and 38 are in transitional shelter; there are no unsheltered youth under 18.

There are a total number of twenty-three (23) sheltered veterans, of those, twelve (12) reside in emergency shelters and eight (8) live in transitional housing; three (3) are unsheltered. Of those 3, two (2) (66.6%) are White and one (1) (33.3%) is Black/African American.

### **Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

The City of Rockford has seen an increase in the aging homeless (40 and up) population. When partners/spouses pass away, many individuals are left with homes in which they cannot afford the care and maintenance. According to stakeholder meetings there were an estimated 80 persons over the age of 40 in a shelter at one time. In addition to the aging homeless populations there has been an uptick in the transient homeless population and consists mostly of individuals who were released from the Department of Corrections.

Stakeholders also identified that substance abusers were more likely to experience homelessness. Many shelters have rules where an individual must be sober in order to receive shelter; those who are unable to remain clean end up being unsheltered. Service providers indicated there needs to be more linkages between the homeless service providers and health care service providers to help substance users with their unique needs.

The City of Rockford has reached functional zero for Veteran and Chronic Homelessness. This means the CoC has reached a target number (seven for veterans and three for chronic homeless) and have been able to maintain that number for over 90 days. It also means they are able to rapidly rehouse newly homeless veterans and new chronically homeless in less than 30 days.

### **Discussion:**

The City of Rockford has reached functional zero for Veteran and Chronic Homelessness. Challenges remain in addressing the gap in services for individuals and families who do not meet the definition of homeless but are on the verge of becoming homeless.

## **NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)**

### **Introduction:**

The assessment of non-homeless special needs includes the following:

- Elderly persons (age 65 years and older)
- Frail elderly
- Persons with mental, physical and/or developmental disabilities
- Persons with alcohol or other drug additions
- Persons with HIV/AIDS and their families
- Victims of domestic violence, dating violence, sexual assault, and stalking

### **Describe the characteristics of special needs populations in your community:**

#### **What are the housing and supportive service needs of these populations and how are these needs determined?**

The special needs population in the City of Rockford have a broad spectrum of characteristics, similar to the City's total population. The main concern for the special needs population is the increased risk of becoming homelessness. This is due to many factors, which include reliance on others for their care, fixed income, alcohol and drug abuse, domestic violence, etc.

Elderly are those individuals aged 62 years and older. According to the 2011-2015 American Community Survey, elderly persons over 62 years represent 18.2% of the City's total population. Approximately 2.8% of the elderly population are age 85 years and older. In addition, 51.1% of the total elderly population (aged 65 and over) live alone, as a single person household.

Frail Elderly are those persons who are elderly and have a form of disability, ranging from a hearing loss, vision difficulty, cognitive difficulty, ambulatory problems, and lack of self-help skills.

Persons with mental, physical and development disabilities, according to the ACS data for 2013-2017, 15.5% (22,563 persons) of the City of Rockford's total population and are classified as "disabled." Persons with mental, physical and developmental disabilities sometimes lack the capacity to care for themselves and rely on a caretaker to assist them on a daily basis. More often than not the caretaker is a parent. If the child outlives the parent who has provided their care all their lives, other arrangements must be made to see to their continued care. This group can include all ages, races, and ethnicities.



**What are the housing and supportive service needs of these populations and how are these needs determined?**

The housing need of each of these groups were determined by consultation with social service providers, and statistical information provided by social services providers.

The City of Rockford has high rates of domestic violence and abuse; 30-40% of calls for service to police are for domestic violence. The Mayor has begun a large push in addressing domestic violence and as more people become aware of this push in support, more people are coming forward about the abuse they face, especially the aging population. There are currently 45 (60 maximum) shelter beds dedicated to victims of domestic violence.

There are no shelters or beds available for individuals who use illicit substances and there are few social services resources for substance users.

There are limited housing options for individuals with physical/mental/developmental disabilities-especially the elderly.

**Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

In 2016, 160 of every 100,000 people were living with HIV in Winnebago County.

**Discussion:**

Not Applicable.

## **NA-50 Non-Housing Community Development Needs – 91.215 (f)**

### **Describe the jurisdiction's need for Public Facilities:**

The following are the needs for improvement to the City's public facilities:

- Public facilities, such as parks, playgrounds, recreational areas, fields of play, and trails need to be improved and upgraded.
- Public facilities, specifically, Pocket Parks being vandalized in predominantly low-income areas
- Flood mitigation on roads and greenways in certain areas of the City.
- Infrastructure improvements to bike trails, walking trails, roads, small bridges etc. throughout the City.
- Improvements and reconstruction of sidewalks, including ADA curb cuts.
- Improved access to public transit.
- Access to affordable amenities such as grocery stores.
- Construction (or designation) of a drop in/day center for seniors.

### **How were these needs determined?**

These needs for public facilities were determined through: the resident survey; agency needs surveys; interviews with City staff, City of Rockford Department of Community and Economic Development, Rockford Housing Authority, and other City agencies; and public hearing comments on needs.

### **Describe the jurisdiction's need for Public Improvements:**

The following are the City's needs for public improvements:

- The City needs to improve and upgrade its storm water management system and flood mitigation infrastructure.
- The City needs to reconstruct and improve its roads, curbs, and sidewalks.
- The City needs to provide for additional handicap accessibility at intersections, public buildings, and community and public facilities.
- The City needs to improve its parks and playground equipment.
- The City needs to continue its public improvements through public greening and beautification activities.
- The City needs to continue to develop its bike and walking trails.

**How were these needs determined?**

These needs for public facilities were determined through: the resident survey; agency needs surveys; interviews with City staff, City of Rockford Department of Community and Economic Development, The City of Rockford Department of Human Services, Rockford Housing Authority, and other City agencies; and public hearing comments on needs.

**Describe the jurisdiction's need for Public Services:**

The City of Rockford provides for public safety and other public services to its residents. The following are the City's need for public services:

- The City needs to continue to provide fire protection to its residents.
- The City needs to provide fair housing education to its citizens as it relates to landlord responsibilities.
- The City needs to continue to provide its high level of public safety to its residents, especially for victims of domestic violence.
- The City needs to continue to provide training to individuals on the use of Narcan during drug overdoses and support the establishment and efforts of drug and alcohol treatment centers.
- The City needs to provide neighborhood policing in areas with high levels of crime.
- The City needs to continue to conduct lethality assessments to protect those who are victims of domestic abuse.
- The City needs to continue to support programs that assist victims of domestic violence and abuse.
- The City needs to continue its code enforcement efforts to ensure the health and safety of its residents.
- The City needs to continue to provide emergency medical services to its residents.
- The City needs to support, encourage, and affirmatively further fair housing throughout its neighborhoods.
- The City needs to continue to support housing counseling services for low and moderate income households in the City.
- The City needs to continue to support programs that serve the elderly and frail elderly residents of the City of Rockford.
- The City needs to continue to support programs that assist the homeless population in the City.
- The City needs to continue to support programs that assist youth through afterschool, education, and recreational programs.
- The City needs to continue to support programs that assist youth who are homeless through afterschool, education, and recreational programs.
- The City needs to continue to support food programs for low and moderate income individuals and families in the City.

- The City needs to continue to support microenterprise programs through technical assistance, advice, and business support services.
- The City needs to continue to support its job training programs for youth, unemployed, and underemployed.
- The City needs to create programming or drop in services for the elderly population.

**How were these needs determined?**

These needs for public facilities were determined through: the resident survey; agency needs surveys; interviews with City staff, City of Rockford Department of Community and Economic Development, Rockford Housing Authority, and other City agencies; and public hearing comments on needs.

## Housing Market Analysis

### MA-05 Overview

#### Housing Market Analysis Overview:

Since 2010 the City's population has been slowly, steadily decreasing and the percentage of rental households has been increasing. Currently the housing stock is approximately 45% renter based; in twenty-two (22) block groups, it is 70% or higher. Approximately 46.2% of the housing stock was built between 1950-1979, and 30.8% of the housing stock was built before 1950; many of these homes have historic status designations according to local ordinances.

According to 2013-2017 American Community Survey Data, the City has 32,628 owner-occupied housing units (55.4% of all occupied housing units) and 26,311 renter-occupied housing units (44.6% of all occupied housing units).

The condition of the housing stock is becoming costlier to maintain. Several owner and renter properties have minor and severe code violations that owners and landlords are unable or refuse to manage and repair. There are approximately 7,791 vacant structures (11.7%) in the City, according to the 2011-2015 American Community Surveys. Many buildings that are not up to code are still occupied by individuals and families. This is higher than the housing vacancy rate of Winnebago County which is 9.3% and higher than the Illinois statewide estimate of 9.7%.

The median home value for the City of Rockford as of 2015 was \$94,200 and the median contract rent was \$587/month for the same time period compared to \$117,700 median home value and \$607 median contract rent for Winnebago County and \$173,800 median home value and \$778 median contract rent for the state of Illinois. RATIO (an architecture, planning, and consulting firm in the Chicagoland area) completed a market analysis, indicating that the Rockford area is lacking in about 5,000 affordable homes.

According to RealtyTrac.com in September of 2019, there is a total of 560 foreclosures in the City of Rockford. Data indicates there are 612 homes for sale and 1,870 were homes recently sold.

## MA-10 Number of Housing Units – 91.210(a)&(b)(2)

### Introduction

According to the 2011-2015 ACS data, there are 66,363 total housing units. There are 58,558 occupied housing units, which means there are 7,805 vacant housing units. The majority of the owner-occupied housing are 4 or more bedrooms (73% of all owner-occupied houses). The majority of the renter-occupied housing are 2 or 3 bedrooms (45% of all renter-occupied houses).

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	39,910	60%
1-unit, attached structure	3,120	5%
2-4 units	12,000	18%
5-19 units	6,245	9%
20 or more units	4,625	7%
Mobile Home, boat, RV, van, etc	463	1%
<b>Total</b>	<b>66,363</b>	<b>100%</b>

**Table 27 – Residential Properties by Unit Number**

Data Source: 2011-2015 ACS

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	103	0%	930	4%
1 bedroom	760	2%	5,590	21%
2 bedrooms	7,935	24%	11,585	45%
3 or more bedrooms	23,730	73%	7,925	30%
<b>Total</b>	<b>32,528</b>	<b>99%</b>	<b>26,030</b>	<b>100%</b>

**Table 28 – Unit Size by Tenure**

Data Source: 2011-2015 ACS

**Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.**

The following number of units in the City of Rockford are assisted with Federal, State, and Local Programs, and are administered by the Rockford Housing Authority:

- **Public Housing** - 1,695 units/families were served, at the year beginning 10/1/2016 of those 614 were elderly and/or disabled.
- **Section 8 Housing** - 1,452 units/families were served at the year beginning 10/1/2016
- **Special Purpose Section 8 Vouchers** - 111 vouchers are special Purpose; 73 of these are VASH, 2 are Bridge, 9 are SRO, and 27 are Port outs.

The data for this section was provided by the Rockford Housing Authority.

**Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.**

There are no affordable housing units that are anticipated that will be lost and there is no anticipated expiration of Section 8 Contracts.

**Does the availability of housing units meet the needs of the population?**

There is an insufficient supply of housing units of various types within the City of Rockford.

**Section 8 Housing:** There are 3,340 applicants on the Public Based Voucher Waitlist, and 1,433 on the Moderate Rehabilitation wait list.

**Public Housing:** There are 1,316 applicants on the family centralized waitlist and 570 on the elderly/disabled centralized waitlist.

Throughout the City in general, there is a shortage of safe, decent, and affordable housing. A limited number of new housing units have been constructed since 2014 and there has been an increase amount of rentership, in some areas as high as 70%. A list of these Block Groups is attached at the end of the section.

**Describe the need for specific types of housing:**

Over half (54.03%) of all residents in the City of Rockford were considered low- to moderate-income at the time of the 2011-2015 American Community Survey.

There is an increasing need for affordable housing, especially for the senior population. The 65+ population has been growing and according to 2011-2015 ACS data, represents 14.6% of the total population, despite the slight decrease in the population overall.

During interviews and meetings, stakeholders continually mentioned the need for mixed income housing units, housing rehabilitation and the need for new units to get individuals and families out of unsafe living conditions.

Stakeholders also mentioned an increasing need for accessible/disabled housing, specifically accommodations for ramps, stair lifts, and walk-in showers. Stakeholders mentioned that some landlords are unwilling to make these accommodations and tenants are hesitant to report it in fear of losing their housing. For the elderly and disabled who own their own home, the cost for accommodation is a cost burden as an upfront or one-time payment.

## **Discussion**

There is a continuing need for affordable and accessible housing in the City of Rockford. The population has been decreasing in the City based on data available. With the decrease in population, properties have not been maintained and landlords allow their properties to fall into disrepair. While the City has made substantial progress in addressing and eliminating blighted property it is unable to keep up with the demand for affordable housing and the simultaneous need for demolition. This leaves some individuals and families living in unsafe, unsanitary housing conditions.



## MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

### Introduction

Housing affordability is based on the amount paid for housing costs. Generally, a unit is affordable if no more than 30% of income is paid for housing. If the amount paid is over 30% the household is cost burdened. Cost burdened households often lack resources to meet their other living costs and at times need to make decisions on which obligations to pay in a given month. This affects both homeowners and renters. At a minimum, this places them at risk of foreclosure or eviction.

### Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	106,300	94,200	(11%)
Median Contract Rent	523	587	12%

**Table 29 – Cost of Housing**

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	8,617	33.1%
\$500-999	15,330	58.9%
\$1,000-1,499	1,550	6.0%
\$1,500-1,999	260	1.0%
\$2,000 or more	275	1.1%
<b>Total</b>	<b>26,032</b>	<b>100.0%</b>

**Table 30 - Rent Paid**

Data Source: 2011-2015 ACS

### Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	2,339	No Data
50% HAMFI	9,569	5,009
80% HAMFI	19,354	11,993
100% HAMFI	No Data	15,837
<b>Total</b>	<b>31,262</b>	<b>32,839</b>

**Table 31 – Housing Affordability**

Data Source: 2011-2015 CHAS

## Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	525	605	800	1,080	1,161
High HOME Rent	525	605	800	1,080	1,161
Low HOME Rent	525	605	746	862	962

**Table 32 – Monthly Rent**

**Data Source:** HUD FMR and HOME Rents

## Is there sufficient housing for households at all income levels?

Based on the HUD - CHAS data (see table in NA-25) there is not sufficient housing for all income levels due to the cost over burden criteria for the following groups:

- **Less than 30% AMI**
  - Renter Households = 2,339
  - White households = 25,875
  - Black/African American households = 4,875
  - Asian Households = 1,030
  - Hispanic Households = 3,870
- **30% to 50% AMI**
  - Owner households = 5,009
  - Renter households = 9,569
  - White households = 5,975
  - Black/African American households = 2,285
  - Asian Households = 180
  - Hispanic Households = 1,320
- **Greater than 50% AMI**
  - Owner Households = 27,830
  - Renter Households = 19,354
  - White households = 5,640
  - Black/African American households = 3,280
  - Asian Households = 215
  - Hispanic Households = 1,540

## How is affordability of housing likely to change considering changes to home values and/or rents?

The demolition of irreparable and blighted housing stock is not being replaced sufficiently with fair market or affordable housing, leaving home buyers and renters limited in their choice for housing. Limited

housing stock and high demand allows landlords to post higher rents for tenants despite the condition of housing units.

**How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?**

According to 2011-2015 American Community Survey Data it is estimated that the area's median rent for an efficiency apartment is \$523, one-bedroom unit is \$527 and \$736 for a two-bedroom unit.

The FMR for an efficiency apartment is \$516, a one-bedroom unit is \$584 and \$777 for a two-bedroom unit based on the FY 2015 HUD rental schedule. The Fair market and High HOME rents are the same for each bedroom size. The Low HOME rents are different for 2, 3, and 4 bedrooms by approximately \$32, \$187, and \$170, respectively.

**Discussion**

Although the cost for housing is considered fair for the Rockford area based on the HUD Fair Market rents, stakeholder meetings and interviews indicate that residents fear reporting housing violations in fear of being evicted or losing their home. There is not a sufficient supply of safe, decent, and affordable housing for the Rockford area.

## MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

### Introduction

The City of Rockford contains 17,268 housing units which were built prior to 1950. This represents 30.8% of the total occupied housing units in the City. Only 6.7% of all occupied housing units were built within the last ten years. Of the 58,565 total housing units in the City, 20,845 (35.6%) housing units have at least one "selected condition." In addition, 45,178 housing units (77.1%) were built before 1980, and therefore contain a potential lead-based paint hazard.

The number of children tested for lead poisoning for the first time in 2017 was 7,770. Of those, there were 57 confirmed new cases of children with blood lead levels  $\geq 10$   $\mu\text{g/dL}$  and 188 children with blood lead levels  $\geq 5$   $\mu\text{g/dL}$ .

### Definitions

The following definitions are used for housing unit evaluation in the City of Rockford:

- **"Selected Housing Condition"** - Over-crowding (1.01 or more persons per room), lacking a complete kitchen, lack of plumbing facilities, and/or other utilities, and cost over-burden.
- **"Substandard condition"** - Does not meet code standards, or contains one of the selected housing conditions.
- **"Suitable for Rehabilitation"** - The amount of work required to bring the unit up to minimum code standard, and the existing debt on the property, together are less than the fair market value of the property.
- **"Not Suitable for Rehabilitation"** - The amount of work required to bring the unit up to minimum code standard exceeds the fair market value of the property after rehabilitation work is complete.

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	8,485	26%	12,360	47%
With two selected Conditions	295	1%	1,005	4%
With three selected Conditions	0	0%	55	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	23,750	73%	12,615	48%
<b>Total</b>	<b>32,530</b>	<b>100%</b>	<b>26,035</b>	<b>99%</b>

**Table 33 - Condition of Units**

Data Source: 2011-2015 ACS

**Year Unit Built**

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	2,535	8%	1,599	6%
1980-1999	4,920	15%	4,325	17%
1950-1979	16,035	49%	11,875	46%
Before 1950	9,029	28%	8,239	32%
<b>Total</b>	<b>32,519</b>	<b>100%</b>	<b>26,038</b>	<b>101%</b>

**Table 34 – Year Unit Built**

Data Source: 2011-2015 CHAS

**Risk of Lead-Based Paint Hazard**

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	25,064	77%	20,114	77%
Housing Units build before 1980 with children present	2,564	8%	1,159	4%

**Table 35 – Risk of Lead-Based Paint**

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

**Vacant Units**

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	7,012	779	7,791
Abandoned Vacant Units	7,012	779	7,791
REO Properties	68	19	87
Abandoned REO Properties	68	19	87

**Table 36 - Vacant Units****Need for Owner and Rental Rehabilitation**

47% of renter households have at least 1 selected housing condition, whereas only 26% of owner occupied units are identified of having at least 1 selected housing condition.

The majority of homes in Rockford were built in and prior to 1979 and these homes likely are identified as having one or more selected housing problems. Homes not suitable for rehab have not been replaced at a pace that can keep up with demolitions. Likewise, rehabilitation of homes has been unaffordable and out of reach financially for homeowners and landlords allowing the cycle of dilapidated and unlivable homes to continue without sufficient and proper replacement.

## **Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards**

There are approximately 25,064 owner-occupied and 20,114 renter-occupied housing units built prior to 1980.

In 2016, the Winnebago County Health Department received funds from the U.S. Department of Housing and Urban Development (HUD) to mitigate lead hazards in at least 200 low to moderate income homes constructed before 1978 and earlier in Winnebago and Boone counties for both **rental or owner occupied housing**. Winnebago County Health Department received notice in late 2019 that they were awarded a new \$3.4 million grant to identify and eliminate lead-based paint hazards in the Rockford area.

## **Discussion**

The information on real estate statistics and foreclosure rates from RealtyTrac report the following:

- There are currently 568 homes in foreclosure in Rockford.
- The median listing price of homes is \$110,000.
- The foreclosure rate for Rockford is 1 in every 1,050 houses.
- A total of 1,854 homes have sold recently in Rockford.

The overall amount of foreclosures have been decreasing since November 2018, based on data available, however, there were still approximately 80 homes placed under foreclosure in September 2019.

## MA-25 Public and Assisted Housing – 91.210(b)

### Introduction

The Rockford Housing Authority (RHA) owns and operates 8 public housing communities. There is a total of 1,918 housing units in the public housing communities.

In addition, the Housing Authority administer 1,806 Housing Choice Vouchers for low- and moderate income households for rental units the City. There are 261 Veterans Affairs Supportive Housing (VASH) Vouchers included in the total. Please see page 69 for additional data from RHA.

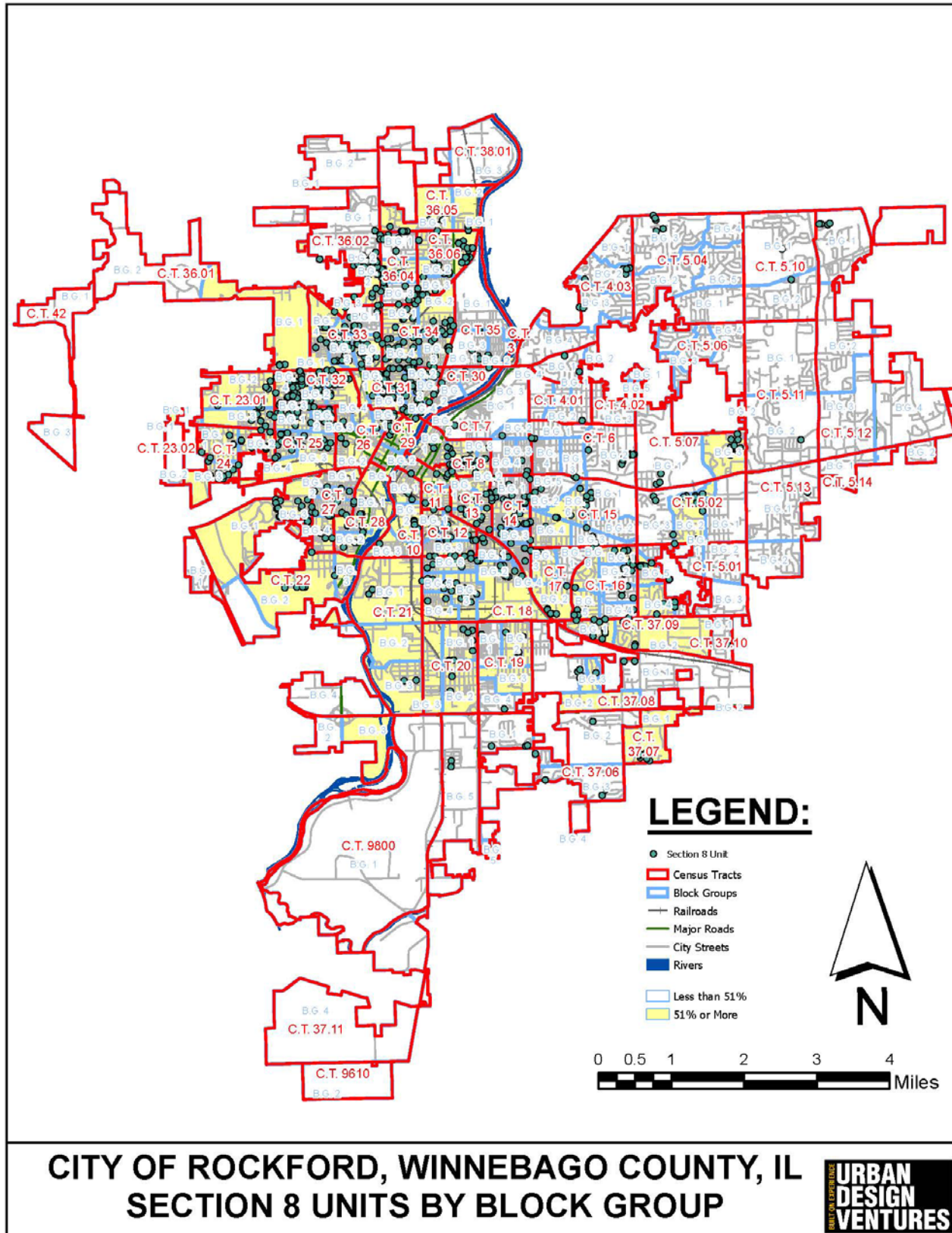
### Totals Number of Units

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Total	Project -based	Tenant -based	Vouchers		
							Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	340	1,918	1,806	0	1,806	261	0	0
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

**Table 37 – Total Number of Units by Program Type**

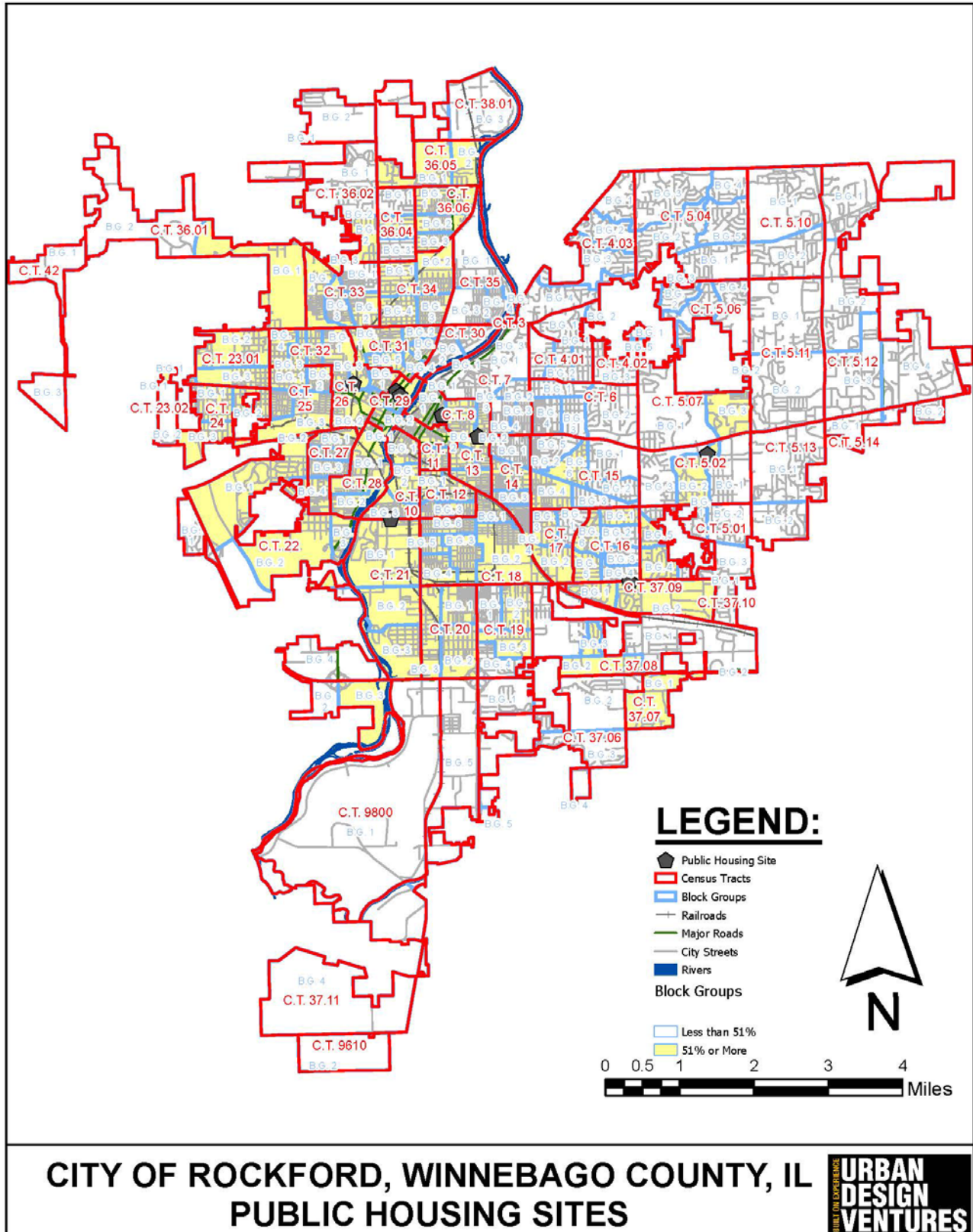
**Data Source:** PIC (PIH Information Center)

Section 8 Housing by Block Group

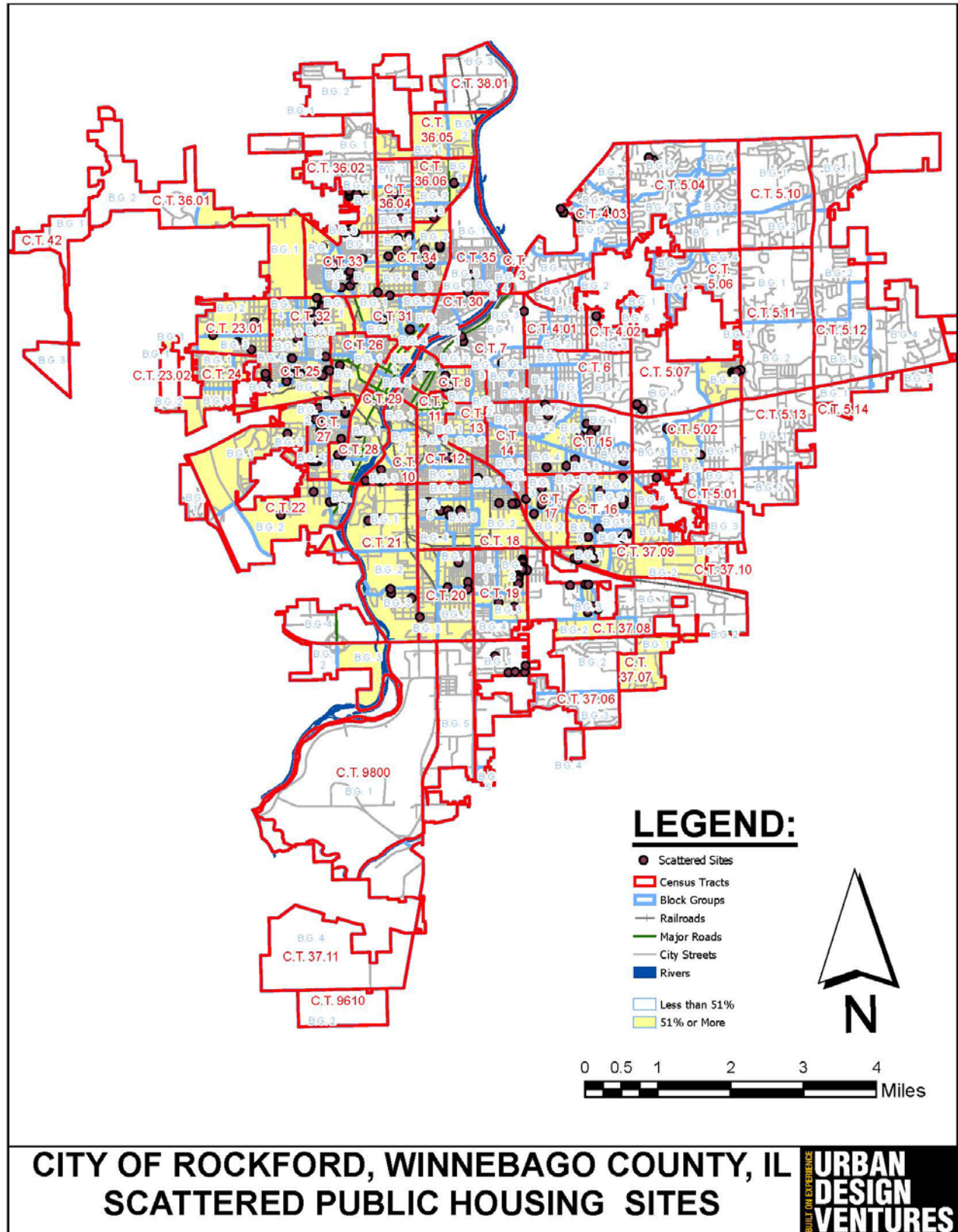




**Public Housing Sites by Block Group**



**Scattered Site Public Housing by Block Group**



**Describe the supply of public housing developments:**

The following units are located at each public housing development:

- Park Terrace - 183 Units
- North Main Manor - 187 Units
- Olesen Plaza – 151 Units
- Jane Addams Parks Apartments – 54 housing units
- Blackhawk Courts – 196 Units
- Fairgrounds Valley – 210 Units
- Summit Green – 27 Units
- Orton Keys – 175 Units
- Brewington Oaks – 169 units (to be demolished)

**Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:**

**Public Housing Condition**

Public Housing Development	Average Inspection Score
Park Terrace	98
North Main Manor	97
Olesen Plaza	86
Jane Addams Parks Apartments	94
Brewington Oaks and Jane Addams Villa	72
Blackhawk Courts	74
Fairgrounds Valley	66
Summit Green	N/A
Orton Keyes Courts	81

**Table 38 - Public Housing Condition**

**Describe the restoration and revitalization needs of public housing units in the jurisdiction:**

The Rockford Housing Authority has been working on a reconstruction and rehabilitation plan of some of its existing housing units. The projects are as follows:

- **Fairgrounds Valley:** Phase 1, construction complete June 2017 of 43 new units
- **Fairgrounds Valley:** Phase 2, 106 family/multi-family acquisition and rehab of foreclosed units in the Rockford region
- **Fairgrounds Valley:** phase 3, 50-unit redevelopment new construction
- **Orton Keyes:** redevelopment of 17 units completed June 2017
- Rehabilitation of scattered sites
- **Brewington Oaks:** demolition of 418 hi-rise units; coordination of relocation with the City of Rockford

**Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:**

The Rockford Housing Authority will continue its work to deconcentrate R/ECAP areas while also working to improve and preserve existing affordable assets within low income census tracts, where renovation is necessary as part of a balanced housing approach. The Rockford Housing Authority will work with the City of Rockford Community & Economic Development department to best align strategies in order to meet the goals of the Five-Year Consolidated Plan. This includes the needs of senior/assisted/memory care, disabled supportive, special needs populations, aging out of foster care, veteran and re-entry housing.

Additionally, in agreement and collaboration with the City of Rockford, RHA will work on issues of deconcentrating, de-densification, relocation, redevelopment, and reinvestment of public housing.

**Discussion:**

Not Applicable.

## MA-30 Homeless Facilities and Services – 91.210(c)

### Introduction

The City of Rockford has reached “functional zero” for Veteran and Chronic Homelessness. The City of Rockford’s Strategy is to support the coordination and cooperation among agencies providing services to the chronically homeless through the Rock River Homeless Coalition that serves Boone, Dekalb and Winnebago Counties. The City and these agencies are members of the Continuum of Care Organization, which meets regularly and has numerous sub-committees to address the needs of the homeless and to support new development of homeless facilities to house families and individuals as well as supportive services to address their needs.

The following table lists the existing facilities for the homeless in the City of Rockford.

### Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	73	0	95	139	0
Households with Only Adults	161	0	41	212	0
Chronically Homeless Households	0	0	0	61	0
Veterans	0	0	15	95	0
Unaccompanied Youth	4	0	0	0	0

Table 39 - Facilities and Housing Targeted to Homeless Households

Data Source Comments:



**Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**

- **Health** - Rosecrance offers inpatient and outpatient services for adults and teens experiencing homelessness
- **Mental Health** - There is a growing need for mental health services, especially among the homeless population. Currently, Rosecrance offers substance abuse and mental health services.
- **Employment** – There are vast job training opportunities available, as well as GED courses, computer courses, and manufacturing jobs available. Homeless individuals often have a difficult time acquiring transportation to these available services.
- **Social Services** - there are various preventative social services to prevent youth from becoming homeless such as job training, and high school diploma/GED programming. The “Love Rockford” event is held each year to help raise awareness of the different services available in the City and help with referrals to services. The City is lacking “wrap around” services to help address all of the needs of individuals and families and help lift them out of the “social service world” to become self-sufficient.
- **Shelter** - There are shelters available for youth, families, and victims of domestic violence. The City of Rockford has reached “Functional Zero” for veteran and chronic homelessness.
- **Education** - There are programs to assist individuals in soft skills and hard skills training to teach about every aspect of employment (timeliness, interview skills, hard/trade skills etc.). There are also employment programs available for youth, especially for those at risk of becoming homeless to help train them after high school for better paying jobs.
- **Rental Assistance** - Some social service providers can provide short term rental assistance and/or security deposit, due to an event beyond their control or for those who need to move out of housing due to condemnation of their building.

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

Providers who are funded with ESG funds include the following:

- Remedies offers 24-hour emergency shelter support and has sixty-two (62) beds for those residing in the shelter.
- Youth Services Network has two youth shelters: The Bridge Emergency Shelter for males and Youth Services Network MELD shelter for females. Each shelter has eight (8) beds available and can expand up to ten (10) as necessary. Transitional housing is also available for young women; twenty-two (22) transitional apartments are available and six (6) permanent housing units.
- The Rockford Rescue Mission offers ninety-one (91) beds; sixty-one (61) are dedicated to women with children.

## **MA-35 Special Needs Facilities and Services – 91.210(d)**

### **Introduction**

The City of Rockford has identified the priorities for services and facilities for special needs population. This includes elderly, frail elderly, persons with disabilities, persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, and public housing residents.

**Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs**

The following needs and objectives are established under this Five Year Consolidated Plan:

- **Elderly** - rehabilitation of existing owner-occupied housing units to help seniors age in place.
- **Frail Elderly** - rehabilitation of existing owner-occupied housing units to help seniors age in place and receive services at home.
- **Persons with Disabilities** - rehabilitation of existing housing units for accessible improvements and reasonable accommodations to rental housing units.
- **Alcohol and Other Drug Addictions** - supportive and wraparound services to support recovery from addictions and services to prevent addiction.
- **Public Housing Residents** - housing down payment assistance, job training and job opportunities, housing counseling for home ownership, and assistance in finding affordable housing.
- **Victims of Domestic Violence** – continuing to support local shelters and victims' services.

**Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

There is a growing need for affordable mental health services and many individuals with mental health issues cannot stay in traditional congregate shelters. Rosecrance provides inpatient and outpatient substance abuse and mental health treatment to teens, families, and adults. Rosecrance also provides shelter for homeless individuals in need of services. Rosecrance incorporates discharge planning in the treatment plans for all clients in order to ensure a client is exiting treatment with the appropriate tools and resources and into a suitable community and living condition.

Seniors who are homeless have the most difficult time finding housing. Saitori Pathway provides assessments and counseling to families, people with dementia, and the developmentally delayed. Saitori Pathway also provides consulting services for long term care providers to better assist those with special



needs, including the elderly. In addition to social services, the state provides to assist with home modifications in order for seniors to remain in their homes.

**Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

The City of Rockford in its Five Year Consolidated Plan proposes the following goals/strategies for "Other Special Needs Priority":

- **SNS-1 Housing** – Increase the supply of affordable, accessible, decent, safe, and sanitary housing for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs through rehabilitation of existing buildings and new construction.
- **SNS-2 Social Services** – Support social service programs and facilities for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs.
- **SNS-3 Accessibility** – Promote and assist in making accessibility improvements for homeowners, making reasonable accommodations, and bring public facilities and infrastructure into compliance with Federal and State Laws.

**For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

Not Applicable.

## MA-40 Barriers to Affordable Housing – 91.210(e)

### Negative Effects of Public Policies on Affordable Housing and Residential Investment

The City of Rockford in its most recent Analysis of Impediments to Fair Housing Choice identified that the City of Rockford does not have a definition for “disabled” or “handicapped” in the general terms of the zoning code. There were no other negative effects of its public policies identified that would serve as barriers to affordable housing. The City has continued to revise and update its Zoning Ordinance the most recent update being in March 2017.

There are no known public policies in the City of Rockford that are a barrier to affordable housing. The City’s Department of Community and Economic Development monitors the following:

- Construction and Development Services
- Neighborhood Standards
- Neighborhood Development
- Economic Development
- Long Range Planning

The City of Rockford’s FY 2020-2024 Analysis of Impediments to Fair Housing Choice has identified the following impediments:

- **Impediment 1: Fair Housing Education and Outreach.** There is a need to educate persons about their rights under the Fair Housing Act and to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities and the disabled population who fear retaliation if they lodge a complaint.
- **Impediment 2: Need for Decent, Safe, and Affordable Rental Housing.** The City of Rockford does not have a sufficient supply of rental housing that is decent, safe, and sound. In many cases, landlords often don’t maintain their property to code standard which results in unsafe living conditions for tenants. However, the monthly cost of rent for apartments has steadily increased due to the limited supply of rental housing, despite the condition of the rental unit.
- **Impediment 3: Lack of Affordable Homeownership Opportunities.** The population of Rockford has decreased since the 2010 U.S. Census and the percentage of share of renters has increased from 39%-46%. In some areas, the share of renters is as high as 70% or more. Home values and access to traditional mortgage financing have decreased since the recession, partly due to significantly higher credit standards and the age of Rockford’s housing stock. Homes within an affordable price range require rehabilitation, which limits the availability of mortgage financing programs for lower income households.
- **Impediment 4: Need for Accessible Housing Units That Are For-Sale or Rent.** There is a lack of accessible housing units in the City of Rockford. Most of the existing housing units do not have accessible features. The City’s disabled population has grown to 15.5% of the total population.

- **Impediment 5: Economic Issues that affect Fair Housing Choice.** There is a lack of economic opportunities in the City which prevent low-income households from improving their income and ability to live outside areas with concentrations of low-income households, which makes this a fair housing concern.

## MA-45 Non-Housing Community Development Assets – 91.215 (f)

### Introduction

The goal of the City of Rockford's economic development policy is to foster economic growth in the community, improve the local economy, and promote job opportunities especially for small minority and women owned businesses.

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	139	13	0	0	0
Arts, Entertainment, Accommodations	6,317	8,167	13	12	-1
Construction	1,650	1,942	3	3	0
Education and Health Care Services	10,766	20,577	22	30	8
Finance, Insurance, and Real Estate	2,293	3,484	5	5	0
Information	795	775	2	1	-1
Manufacturing	11,293	12,955	23	19	-4
Other Services	2,139	3,139	4	5	1
Professional, Scientific, Management Services	2,440	2,612	5	4	-1
Public Administration	0	0	0	0	0
Retail Trade	6,235	7,792	13	11	-2
Transportation and Warehousing	2,392	2,725	5	4	-1
Wholesale Trade	2,492	3,680	5	5	0
Total	48,951	67,861	--	--	--

**Table 40 - Business Activity**

**Data Source:** 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

**Labor Force**

Total Population in the Civilian Labor Force	71,928
Civilian Employed Population 16 years and over	61,230
Unemployment Rate	14.89
Unemployment Rate for Ages 16-24	40.76
Unemployment Rate for Ages 25-65	9.80

**Table 41 - Labor Force**

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	10,605
Farming, fisheries and forestry occupations	2,480
Service	7,830
Sales and office	14,330
Construction, extraction, maintenance and repair	3,915
Production, transportation and material moving	5,430

**Table 42 – Occupations by Sector**

Data Source: 2011-2015 ACS

**Travel Time**

Travel Time	Number	Percentage
< 30 Minutes	46,870	81%
30-59 Minutes	8,460	15%
60 or More Minutes	2,470	4%
<b>Total</b>	<b>57,800</b>	<b>100%</b>

**Table 43 - Travel Time**

Data Source: 2011-2015 ACS

**Education:****Educational Attainment by Employment Status (Population 16 and Older)**

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	5,500	1,635	4,975

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	14,650	2,415	6,075
Some college or Associate's degree	16,815	2,565	5,084
Bachelor's degree or higher	12,625	760	2,205

**Table 44 - Educational Attainment by Employment Status**

Data Source: 2011-2015 ACS

**Educational Attainment by Age**

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	354	610	1,318	2,348	2,115
9th to 12th grade, no diploma	2,663	2,490	2,074	3,270	2,244
High school graduate, GED, or alternative	5,070	6,110	5,555	11,474	7,120
Some college, no degree	4,295	5,125	3,875	8,925	4,544
Associate's degree	779	1,910	1,375	3,280	1,190
Bachelor's degree	790	3,085	2,215	4,395	2,625
Graduate or professional degree	29	1,220	1,430	3,260	2,124

**Table 45 - Educational Attainment by Age**

Data Source: 2011-2015 ACS

**Educational Attainment – Median Earnings in the Past 12 Months**

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	42,235
High school graduate (includes equivalency)	91,153
Some college or Associate's degree	96,186
Bachelor's degree	122,211
Graduate or professional degree	172,817

**Table 46 – Median Earnings in the Past 12 Months**

Data Source: 2011-2015 ACS

**Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?**

The three (3) largest categories of jobs in business by sector is as follows:

- **Educational and Health Care Services:** 20,577 jobs
- **Manufacturing:** 12,955 jobs
- **Arts, Entertainment, Accommodations:** 8,167 jobs
- **Total: 41,699 jobs**

These three categories represent 61.4% of the total number of jobs in the City of Rockford.

According to the Rockford Area Economic Development Council (updated May 2018), the top ten (10) public and private employers in the Rockford area are the following:

1. Fiat Chrysler Automobiles (5,152 Employees)
2. Mercyhealth (4,000 Employees)
3. Rockford Public Schools (3,713 Employees)
4. Swedish American Health System (3,359 Employees)
5. OSF Healthcare (2,800 Employees)
6. UPS (2,379 Employees)
7. Rockwell Collins (formerly UTC Aerospace Systems) (2,200 Employees)
8. Woodward (1,900 Employees)
9. PCI-Packaging Coordinators Inc (1,800 Employees)
10. Walmart Stores (1,471 Employees)

**Describe the workforce and infrastructure needs of the business community:**

There are several manufacturing and factory jobs within the City of Rockford and on the outskirts. However, transportation to these jobs remains difficult. Public transportation service is not sufficient for second and third shift workers to get to or from work.

Several stakeholders identified a lack of workforce training opportunities as a barrier for community members to find work that pays a livable wage. For training programs that are available, transportation often remains a barrier.

There are large areas available for economic and infill development, especially light industrial space but timeliness and policy issues are often a deterrent for potential new businesses.

**Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

There has been an increase in efforts to address and restore brownfield sites through the use of available grants. CDBG has been used as a flexible funding source, primarily to help stimulate job creation and entrepreneurial efforts-especially for women and minority owned businesses.

As these changes occur there is a growing need for job training opportunities to fill jobs positions being created. There is the potential for partnerships with the Rock Valley College and other local universities for training and educational opportunities.

### **How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?**

According to the 2011-2015 American Community Survey data, the City of Rockford has an unemployment rate of 14.9% which is higher than the Illinois unemployment rate of 9.1% for that same period. In Rockford, the population 16 years old and over was 61,230. Of those an estimated 62.4% were counted in the labor force.

The employment breakdown by number of positions in each industry is as follows according to 2011-2015 American Community Survey data:

- **Agriculture, Mining, Oil & Gas Extraction – 13**
- **Arts, Entertainment, Accommodations – 8,167**
- **Construction – 1,942**
- **Education and Health Care Services – 20,577**
- **Finance, Insurance, and Real Estate – 3,484**
- **Information – 775**
- **Manufacturing – 12,955**
- **Other Services except public administration – 3,139**
- **Professional, Scientific, Management Services – 2,612**
- **Retail Trade – 7,792**
- **Transportation and Warehousing – 2,725**
- **Wholesale Trade – 3,680**

Note that data was not available for Public Administration jobs.

In addition to the occupation breakdown the following is a breakdown of type of employment:

- **Employee of private company workers – 44,367**
- **Self-employed in own incorporated business – 1,695**
- **Private not-for-profit wage and salary workers – 6,257**
- **Local, State, and Federal government workers – 6,311**
- **Self-employed in own not incorporated business workers and unpaid family workers – 2,587**



**Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.**

There is a growing need for workforce training initiatives. Currently there is a dislocated worker program available for people who have been laid off and are looking for employment.

There is still a growing need for training for unskilled and uneducated persons. There is a high number of individuals who do not possess a GED or high school diploma and are unable to find work that pays a livable wage. There are current partnerships with the Rock Valley Technical College, the Rockford Public Library, and others for job training, computer training, technical skills training and GED opportunities.

**Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?**

Yes

**If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.**

Yes, Northern Illinois (Winnebago, Boone and McHenry Counties) currently has a Comprehensive Economic Development Strategy for FY 2016-2020.

The following are initiatives that affect growth within the MSA:

- **Rockford Region Strategic Diversification Plan (2012):** this plan analyzed the Rockford MSA's competitiveness in aerospace, aviation and logistics, medical equipment manufacturing, and alternative energy parts manufacturing.
- **Chicago Metro West Manufacturing Alliance for the Investing in Manufacturing Communities partnership:** This plan was developed in 2014 and 2015 with Boone, McHenry, and Winnebago counties, as well as other partner counties, to strengthen the region's shared advanced manufacturing sectors – particularly metalworking, aerospace, production technology, and vehicle manufacturing.
- **Transportation for Tomorrow 2040:** A Long-Range Transportation Plan for the Rockford Region: This plan prioritizes infrastructure upgrades in Boone and Winnebago counties that are needed to improve freight and people mobility and pays special attention to economic development and land use. Work has begun on the 2050 Metropolitan Transportation Plan.
- **Rockford Area Economic Development Council Rockforward 20/20 Strategic Plan (2015):** This plan for Winnebago County's economic development agency – which is a key partner in the CEDS – was developed at the same time as this CEDS, and thus shares goals and strategies.

- **Rockford Regional Plan for Sustainable Development (2014):** The plan for the Rockford MSA was created by the Rockford Region Vital Signs project and the Rockford Metropolitan Agency for Planning through funding from the U.S. Department of Housing and Urban Development and the U.S. Environmental Protection Agency. Among other recommendations, this plan outlined some of the concepts used to develop the Regional Planning Commission that became a top CEDS priority.
- **City of Rockford 2020 Comprehensive Plan:** The 2015 update of this plan used the previous CEDS, the Rockford Region Diversification Plan, other plans, and extensive community input to develop action steps for the region's largest city. Items from its economic development, quality of life, and infrastructure sections are in the CEDS as city priorities that fit regional goals.
- **Transform Rockford:** This ongoing grassroots community initiative, focused in Winnebago County but including Boone County is creating a strategic plan to make Rockford a "top 25 community by 2025." Its Jobs and Economy team reviewed the previous Comprehensive Economic Development Strategy and assisted with identifying key initiatives for this CEDS.

## Discussion

There are several agencies and community groups that are aware of the growing need for job training opportunities in the City of Rockford and surrounding region. Community groups, social services, and public and private entities will have to work in tandem to address the employment needs within the region.

## **MA-50 Needs and Market Analysis Discussion**

### **Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")**

Households with multiple housing problems are located throughout the City of Rockford. Several households are already cost overburdened and the cost to rehabilitate a home is not seen as a gain for homeowners or landlords because the returns do not match or exceed the cost of the rehab. Cost burden in the CHAS data is only available for low and moderate income families. Using other data sources, it is evident that cost burden is located everywhere in the City of Rockford. The CHAS data, however, does reveal information regarding housing problems for specific minority groups and areas of minority concentration are already defined and mapped in this report.

### **Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

The most recent data available on the concentration of racial or ethnic groups is the 2013-2017 American Community Survey data. According to this data, the City of Rockford has a minority population of 33.1% of its total population. The City uses the definition of an Area of Minority Concentration as a Census Tract or Block Group where at least 50% of the population who reside in that area are identified as being a minority person. Based on this definition there are 19 Census Tracts (or partial Census Tracts) in the City with a percentage of minority persons over 50%: Census Tract 10; Census Tract 12; Census Tract 13; Census Tract 18; Census Tract 21; Census Tract 22; Census Tract 23.01; Census Tract 24; Census Tract 25; Census Tract 26; Census Tract 27; Census Tract 28; Census Tract 29; Census Tract 31; Census Tract 32; Census Tract 33; Census Tract 36.06; Census Tract 37.08; and Census Tract 9800.

### **What are the characteristics of the market in these areas/neighborhoods?**

These areas have some of the oldest housing stock in the City of Rockford as well as occupy areas where manufacturing companies and factories once stood. These areas are also split by the Rock River and have, in general, higher concentrations of rental housing units. However, there are some areas, east of the river, of minority concentration that have higher rates of homeownership.

### **Are there any community assets in these areas/neighborhoods?**

Community assets vary. The City has developed community centers and facilities along the Rock River that are not exclusive to any particular neighborhood. Other neighborhoods have parklets/playgrounds, community gardens, splash pads, etc. Most have retained their churches and other institutions.

**Are there other strategic opportunities in any of these areas?**

The Neighborhood Revitalization Strategy Area targets several of these census tracts and neighborhood areas.

The City of Rockford has prioritized opportunities and support for minority and women owned businesses. Economic development programs are intentionally marketed to MBE/WBE businesses.

## **MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

### **Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

Access to broadband is a critical component of staying ahead of the curve and will improve the lives of families, entrepreneurs, farmers and other Illinoisans who rely on high-speed broadband for everything from healthcare to education. Governor Pritzker recently launched a statewide initiative, Connect Illinois, to expand broadband access across the entire state.

To inform and advise the Connect Illinois program, the Governor-appointed Illinois Broadband Advisory Council convened in August 2019. The 25-member council includes representation from various internet service providers, state agency officials and legislators, and certain broadband-related stakeholders. It is the duty of the council and working groups to explore all ways to expand broadband availability to end-user customers, and identify ways to eliminate barriers, especially for those of low-to-moderate income.

Access to broadband is critical for households of all types in the City of Rockford. Comcast offers a program called “Internet Essentials” which offers an affordable internet options for any resident that is receiving Federal or State Public Benefits.

### **Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.**

The Rockford Area Economic Development Council examined how to leverage the convergence of improved bandwidth, innovative applications, and useful metrics to promote and measure the impact of new broadband investment and related opportunities. It found that broadband is increasingly necessary for business attraction and growth in the economy of today – and tomorrow. For instance, broadband was found to reduce transaction costs and improve access to online resources, boosting sales and reducing input costs. In addition, multiple studies suggest that rural broadband is positively associated with: GDP growth; median household incomes; farm revenues; and non-farm rural business growth – with faster broadband having greater impact.

Residential broadband is also an important business attraction tool, providing quality of life for workers and local customers – and the capacity for telework, flex schedules, or home-based business start-ups that could grow to produce new jobs or future property tax base.

The state’s recently-released five-year economic plan highlights six primary sectors for driving growth: agriculture; energy; healthcare; information technology; manufacturing and transportation.

**MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)****Describe the jurisdiction's increased natural hazard risks associated with climate change.**

Due to existing seasonal weather extremes in the upper Midwest, the City of Rockford is at an increased natural hazard risk due to climate change. The City of Rockford is already prone to temperature extremes, severe thunderstorms with damaging winds, flash flooding, and widespread flooding along the Rock River, and the frequency of occurrence will continue to increase as a result of climate change associated with global warming.

**Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.**

Vulnerability of housing occupied by low and moderate income households will vary across the different types of natural hazard risks. In an effort to reduce vulnerability in areas prone to flash flooding and widespread flooding along the Rock River, mitigation plans have been developed and are regularly reviewed. Housing occupied by low and moderate income households is less vulnerable due to robust disaster assistance programs in the area. The City works with Winnebago County and state and federal agencies as needed.

## Strategic Plan

### SP-05 Overview

#### Strategic Plan Overview

The Five Year Consolidated Plan is a guide for the City of Rockford to use in its housing, community development, and economic programs and initiatives. The Strategic Plan portion of the Five Year Consolidated Plan establishes the City's goals and objectives to address its need for:

- Housing
- Homelessness
- Special Needs
- Community Development
- Economic Development
- Administration, Planning, and Management

This strategy has been developed as the result of meetings agencies/organizations, public hearings, community meetings, resident survey, agency/organization survey, and consultations. It is based on the needs assessment and market analysis.

The over-riding objective and strategy is to assist low and moderate income residents (income of less than 80% of the area median income). These residents are referred to as the "target income" group. The City has an overall low and moderate income percentage of its population at 54.03%. The City is cognizant of the Federal regulation that at least 70% of all its CDBG funds must principally benefit low and moderate income persons. The City is committed to this and has designed its Strategic Plan to meet that requirement through a multi-year certification.

The principles of the FY 2020-2024 Consolidated Plan are as follows:

- **Assist** - By developing comprehensive strategies to support and assist those residents who are low and moderate income.
- **Involve** - The community and provide opportunities for resident input in the planning process and preparation of the plan.
- **Collaborate** - Between public, private, and non-profit agencies and organizations to ensure that activities and services will be efficient and effective.
- **Leverage** – CDBG, HOME, ESG funds and other local resources to maximize the effectiveness of programs and services.
- **Promote** - Involvement of agencies and organization to undertake specific projects and activities to assist low and moderate income persons.

The priority needs of the Five Year Consolidated Plan were determined based on the following:

- Research of existing data on needs of the City
- Thorough consultation with City staff and officials
- Interviews and meetings with stakeholders
- Public hearings
- Community meetings
- Resident surveys
- Agency/Organization surveys
- Surveys of social service providers, housing organizations, and community and economic development agencies

The key factors affecting the determination of the Five-Year priorities for the Consolidated Plan include the following:

- The types of target income households with the greatest needs
- The areas with the greatest concentration of low-income households
- Activities that will best address the needs of City residents
- The limited amount of funding available to meet the needs
- The ability to leverage additional financial resources



**SP-10 Geographic Priorities – 91.215 (a)(1)****Geographic Area****Table 47 - Geographic Priority Areas**

<b>1.</b>	<b>Area Name:</b>	<b>CDBG Eligible Areas</b>
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	-
	<b>HUD Approval Date:</b>	-
	<b>% of Low/ Mod:</b>	-
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	-
	<b>Identify the neighborhood boundaries for this target area.</b>	C.T. 000501 B.G. 4, 5; C.T. 000502 B.G. 2; C.T. 000507 B.G. 3; C.T. 000800 B.G. 1, 2, 3; C.T. 001000 B.G.1,2,3; C.T. 001100 B.G. 1, 2; C.T. B.G.; C.T. 001200 B.G. 1, 2, 3; C.T. 001300 B.G. 1, 2, 3; C.T. 001400 B.G. 2, 3, 4; C.T. 001500 B.G. 4, 6; C.T. 001600 B.G. 1, 5, 6; C.T. 001700 B.G. 2, 3; C.T. 001800 B.G. 1, 2, 3, 4, 5, 6; C.T. 001900 B.G. 2, 3; C.T. 00200 B.G. 1, 2, 3; C.T. 002100 B.G. 1, 2, 3; C.T. 002200 B.G. 1, 2, 3; C.T. 002301 B.G. 1, 2, 3; C.T. 002400 B.G. 1, 2, 3; C.T. 002500 B.G. 1, 2, 3, 4; C.T. 002600 B.G. 1, 2, 3, 4; C.T. 002700 B.G. 1, 2, 3, 4; C.T. 002800 B.G. 1, 2; C.T. 002900 B.G.1, 2; C.T. 003100 B.G. 1, 2, 3, 4, 5; C.T. 003200 B.G. 1, 2, 3, 4; C.T. 003300 B.G. 2, 3, 4; C.T. 003400 B.G. 1, 2, 3, 4; C.T. 003601 B.G. 1; C.T. 003602 B.G. 2, 3; C.T. 003604 B.G. 2; C.T. 003605 B.G. 1, 2; C.T. 003606 B.G.1, 2, 3; C.T. 003707 B.G. 1; C.T. 003708 B.G. 2, 3; C.T. 003709 B.G. 1, 2; and C.T. 003711 B.G. 3.
	<b>Include specific housing and commercial characteristics of this target area.</b>	-
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	-
	<b>Identify the needs in this target area.</b>	-

	What are the opportunities for improvement in this target area?	-
	Are there barriers to improvement in this target area?	-
2.	Area Name:	City Wide
	Area Type:	Non-targeted for Low-Mod Individual Benefit and Administration
	Other Target Area Description:	Non-targeted for Low-Mod Individual Benefit and Administration
	HUD Approval Date:	-
	% of Low/ Mod:	-
	Revital Type:	-
	Other Revital Description:	-
	Identify the neighborhood boundaries for this target area.	The entire City limits.
	Include specific housing and commercial characteristics of this target area.	-
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	-
	Identify the needs in this target area.	-
	What are the opportunities for improvement in this target area?	-
	Are there barriers to improvement in this target area?	-
3.	Area Name:	Neighborhood Revitalization Strategy Area (NRSA)
	Area Type:	Local Target area
	Other Target Area Description:	-
	HUD Approval Date:	-
	% of Low/ Mod:	-
	Revital Type:	Other
	Other Revital Description:	Neighborhood Revitalization Strategy Area (NRSA)

<b>Identify the neighborhood boundaries for this target area.</b>	C.T. 002800 B.G. 1; C.T. 00100 B.G. 2; C.T. 002800 B.G. 2; C.T. 002700 B.G. 2; C.T. 002200 B.G. 3; C.T. 001300 B.G. 1; C.T. 00300 B.G. 3; C.T. 002700 B.G. 1; C.T. 002700 B.G. 3; C.T. 001100 B.G. 2; C.T. 001200 B.G. 2; and C.T. 001200 B.G. 1
<b>Include specific housing and commercial characteristics of this target area.</b>	See attached Neighborhood Revitalization Strategy Area (NRSA) Plan.
<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	See attached Neighborhood Revitalization Strategy Area (NRSA) Plan.
<b>Identify the needs in this target area.</b>	See attached Neighborhood Revitalization Strategy Area (NRSA) Plan.
<b>What are the opportunities for improvement in this target area?</b>	See attached Neighborhood Revitalization Strategy Area (NRSA) Plan.
<b>Are there barriers to improvement in this target area?</b>	See attached Neighborhood Revitalization Strategy Area (NRSA) Plan.

## General Allocation Priorities

### Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The City of Rockford will allocate its CDBG, HOME, and ESG funds to those geographic areas whose population is over 51% low- and moderate-income as well as a specific targeted Neighborhood Revitalization Strategy Area whose residents are all in the upper quartile low and moderate income.

The City housing programs are generally available on a City-wide basis.

There are 98 Block Groups that are considered low- to moderate-income in the City of Rockford. They are the following: C.T. 000501 B.G. 4, 5; C.T. 000502 B.G. 2; C.T. 000507 B.G. 3; C.T. 000800 B.G. 1, 2, 3; C.T. 001000 B.G.1,2,3; C.T. 001100 B.G. 1, 2; C.T. B.G.; C.T. 001200 B.G. 1, 2, 3; C.T. 001300 B.G. 1, 2, 3; C.T. 001400 B.G. 2, 3, 4; C.T. 001500 B.G. 4, 6; C.T. 001600 B.G. 1, 5, 6; C.T. 001700 B.G. 2, 3; C.T. 001800 B.G. 1, 2, 3, 4, 5, 6; C.T. 001900 B.G. 2, 3; C.T. 00200 B.G. 1, 2, 3; C.T. 002100 B.G. 1, 2, 3; C.T. 002200 B.G. 1, 2, 3; C.T. 002301 B.G. 1, 2, 3; C.T. 002400 B.G. 1, 2, 3; C.T. 002500 B.G. 1, 2, 3, 4; C.T. 002600 B.G. 1, 2, 3, 4; C.T. 002700 B.G. 1, 2, 3, 4; C.T. 002800 B.G. 1, 2; C.T. 002900 B.G.1, 2; C.T. 003100 B.G. 1, 2, 3, 4, 5; C.T.

003200 B.G. 1, 2, 3, 4; C.T. 003300 B.G. 2, 3, 4; C.T. 003400 B.G. 1, 2, 3, 4; C.T. 003601 B.G. 1; C.T. 003602 B.G. 2, 3; C.T. 003604 B.G. 2; C.T. 003605 B.G. 1, 2; C.T. 003606 B.G.1, 2, 3; C.T. 003707 B.G. 1; C.T. 003708 B.G. 2, 3; C.T. 003709 B.G. 1, 2; and C.T. 003711 B.G. 3.

## Low- and Moderate-Income in the City of Rockford, IL

TRACT	BLK GRP	LOW/MOD	LOWMOD UNIV	LOWMOD PCT
000300	1	285	610	46.72%
000300	2	435	840	51.79%
000300	3	410	775	52.90%
000300	4	530	980	54.08%
000300	5	260	830	31.33%
000401	1	240	635	37.80%
000401	2	260	635	40.94%
000401	3	155	655	23.66%
000402	1	50	705	7.09%
000402	2	180	675	26.67%
000402	3	405	1370	29.56%
000403	1	230	605	38.02%
000403	2	345	1055	32.70%
000403	3	550	1655	33.23%
000403	4	145	700	20.71%
000501	1	210	940	22.34%
000501	2	80	770	10.39%
000501	3	290	740	39.19%
000501	4	730	1025	71.22%
000501	5	450	810	55.56%
000502	1	255	705	36.17%
000502	2	810	1515	53.47%
000502	3	340	820	41.46%
000504	1	180	1235	14.57%
000504	2	375	1890	19.84%
000504	3	515	2190	23.52%
000504	4	0	555	0.00%
000504	5	140	1000	14.00%
000506	1	140	855	16.37%
000506	2	265	550	48.18%
000506	3	120	1110	10.81%
000506	4	95	1050	9.05%
000506	5	120	835	14.37%
000507	1	560	1190	47.06%
000507	2	130	1020	12.75%
000507	3	875	1480	59.12%
000510	1	225	1355	16.61%
000510	2	220	1765	12.46%

## Low/Moderate Income Chart # 1

000511	1	215	1105	19.46%
000511	2	450	1545	29.13%
000512	1	335	845	39.64%
000512	2	225	1000	22.50%
000512	3	480	1905	25.20%
000512	4	260	1485	17.51%
000513	1	655	1970	33.25%
000513	2	235	1620	14.51%
000514	1	420	1390	30.22%
000514	2	190	1115	17.04%
000514	3	245	1060	23.11%
000600	1	205	435	47.13%
000600	2	955	1890	50.53%
000600	3	420	905	46.41%
000600	4	170	1055	16.11%
000700	1	455	980	46.43%
000700	2	380	795	47.80%
000700	3	405	905	44.75%
000700	4	15	520	2.88%
000800	1	565	670	84.33%
000800	2	810	1195	67.78%
000800	3	615	865	71.10%
001000	1	325	355	91.55%
001000	2	460	530	86.79%
001000	3	1110	1225	90.61%
001100	1	480	590	81.36%
001100	2	325	495	65.66%
001200	1	505	820	61.59%
001200	2	360	570	63.16%
001200	3	555	765	72.55%
001300	1	685	840	81.55%
001300	2	545	695	78.42%
001300	3	1125	1420	79.23%
001400	1	515	1350	38.15%
001400	2	940	1235	76.11%
001400	3	480	625	76.80%
001400	4	575	685	83.94%
001500	1	280	670	41.79%
001500	2	215	495	43.43%
001500	3	340	825	41.21%
001500	4	850	1315	64.64%

**Low/Moderate Income Chart # 2**

001500	5	315	760	41.45%
001500	6	480	850	56.47%
001600	1	540	945	57.14%
001600	2	350	695	50.36%
001600	3	825	1730	47.69%
001600	4	375	810	46.30%
001600	5	465	835	55.69%
001600	6	405	685	59.12%
001700	1	390	965	40.41%
001700	2	775	1305	59.39%
001700	3	715	1120	63.84%
001800	1	740	905	81.77%
001800	2	945	1005	94.03%
001800	3	680	1025	66.34%
001800	4	385	560	68.75%
001800	5	595	675	88.15%
001800	6	915	1445	63.32%
001900	1	370	865	42.77%
001900	2	820	1100	74.55%
001900	3	475	845	56.21%
001900	4	180	460	39.13%
002000	1	1110	1230	90.24%
002000	2	745	1370	54.38%
002000	3	100	195	51.28%
002100	1	600	635	94.49%
002100	2	810	840	96.43%
002100	3	420	570	73.68%
002200	1	840	1095	76.71%
002200	2	800	1260	63.49%
002200	3	510	625	81.60%
002200	4	290	735	39.46%
002301	1	565	910	62.09%
002301	2	795	960	82.81%
002301	3	555	870	63.79%
002302	1	460	670	68.66%
002302	2	170	585	29.06%
002400	1	895	915	97.81%
002400	2	525	600	87.50%
002400	3	700	760	92.11%
002500	1	1015	1090	93.12%
002500	2	700	850	82.35%

**Low/Moderate Income Chart # 3**

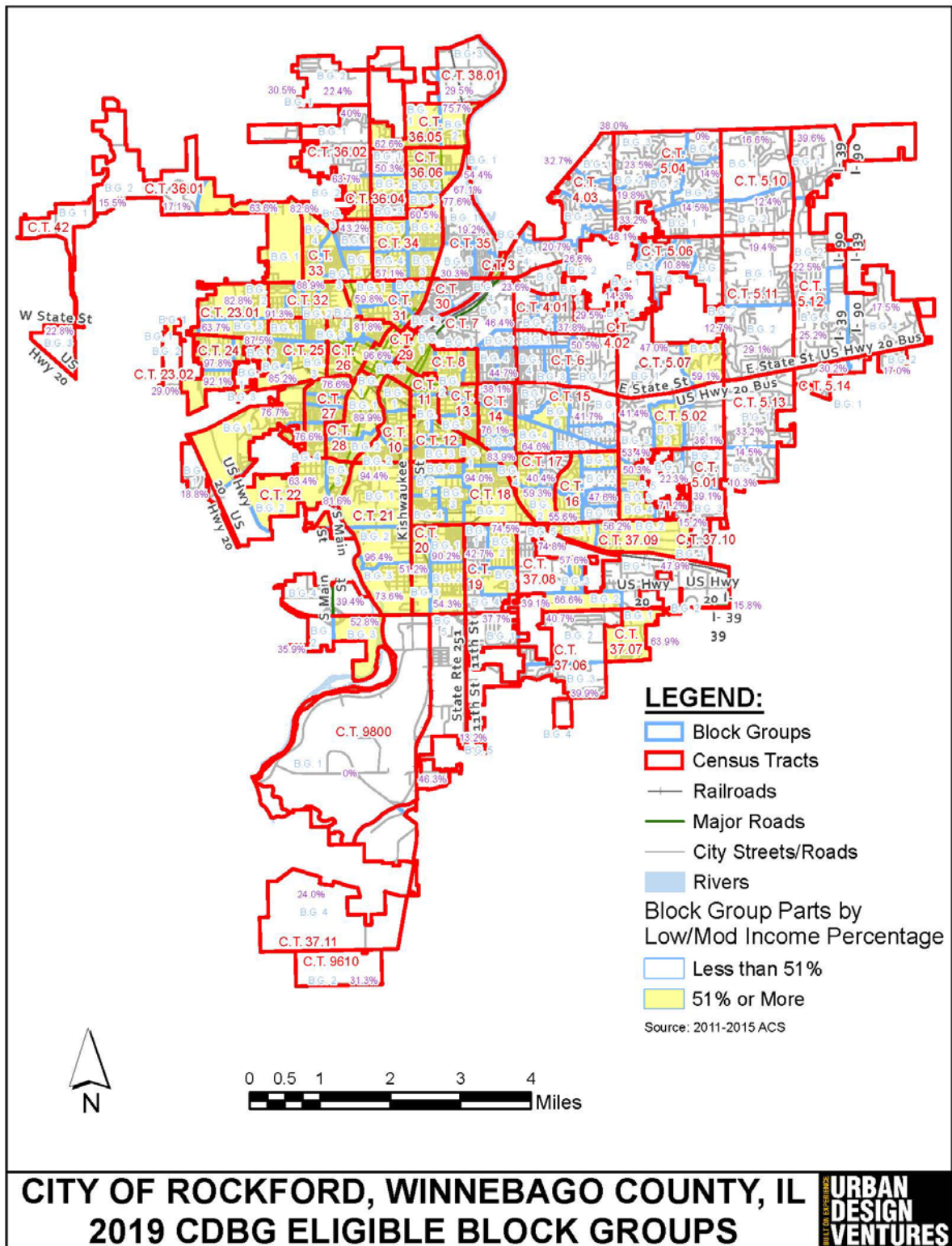
002500	3	665	780	85.26%
002500	4	580	805	72.05%
002600	1	745	910	81.87%
002600	2	180	245	73.47%
002600	3	430	465	92.47%
002600	4	605	640	94.53%
002700	1	540	705	76.60%
002700	2	575	690	83.33%
002700	3	420	565	74.34%
002700	4	820	1070	76.64%
002800	1	1030	1145	89.96%
002800	2	610	710	85.92%
002900	1	870	900	96.67%
002900	2	270	300	90.00%
003000	1	100	585	17.09%
003000	2	500	1130	44.25%
003100	1	560	935	59.89%
003100	2	395	695	56.83%
003100	3	260	430	60.47%
003100	4	670	775	86.45%
003100	5	750	955	78.53%
003200	1	1050	1160	90.52%
003200	2	725	815	88.96%
003200	3	370	605	61.16%
003200	4	1000	1095	91.32%
003300	1	290	670	43.28%
003300	2	700	1300	53.85%
003300	3	605	880	68.75%
003300	4	460	555	82.88%
003400	1	525	910	57.69%
003400	2	530	875	60.57%
003400	3	970	1900	51.05%
003400	4	680	1190	57.14%
003500	1	125	650	19.23%
003500	2	30	865	3.47%
003500	3	310	1020	30.39%
003601	1	560	880	63.64%
003601	2	115	670	17.16%
003602	1	500	1250	40.00%
003602	2	1065	1670	63.77%
003602	3	440	720	61.11%

**Low/Moderate Income Chart # 4**

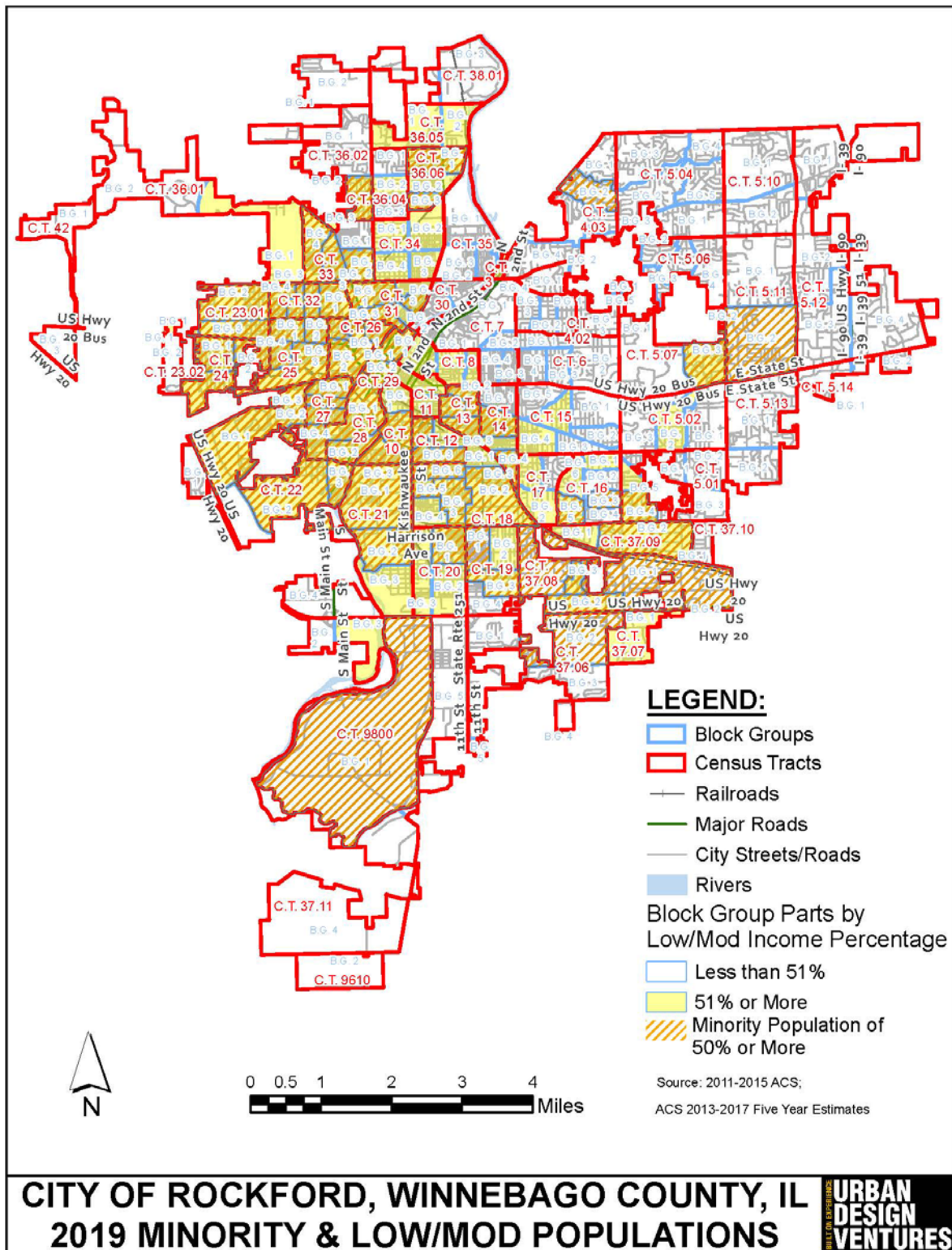


003604	1	385	765	50.33%
003604	2	565	940	60.11%
003604	3	330	1095	30.14%
003605	1	670	1070	62.62%
003605	2	265	350	75.71%
003606	1	645	1185	54.43%
003606	2	655	975	67.18%
003606	3	400	515	77.67%
003705	1	90	940	9.57%
003705	2	210	685	30.66%
003705	3	265	790	33.54%
003705	4	345	840	41.07%
003705	5	290	1745	16.62%
003706	1	485	1285	37.74%
003706	2	680	1670	40.72%
003706	3	725	1815	39.94%
003706	4	130	680	19.12%
003706	5	130	985	13.20%
003707	1	1820	2845	63.97%
003707	2	165	1040	15.87%
003708	1	710	1480	47.97%
003708	2	530	795	66.67%
003708	3	320	555	57.66%
003709	1	595	795	74.84%
003709	2	450	800	56.25%
003710	1	170	1115	15.25%
003710	2	285	1345	21.19%
003711	1	335	1780	18.82%
003711	2	490	1365	35.90%
003711	3	140	265	52.83%
003711	4	130	540	24.07%
003711	5	375	810	46.30%
003801	1	220	720	30.56%
003801	2	250	1115	22.42%
003801	3	1255	4245	29.56%
004200	1	205	1320	15.53%
004200	2	535	2720	19.67%
004200	3	350	1530	22.88%
004200	4	25	800	3.13%
980000	1	0	0	0.00%

Data obtained from [www.hud.gov](http://www.hud.gov)**Low/Moderate Income Chart # 5**



Low/Moderate Income Percentage by Block Group



Low/Moderate Income Percentage w/ Minority Overlay by Block Group





**SP-25 Priority Needs - 91.215(a)(2)****Priority Needs****Table 48 – Priority Needs Summary**

<b>1.</b>	<b>Priority Need Name</b>	<b>Housing Strategy</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	<b>Geographic Areas Affected</b>	Non-targeted for Low-Mod Individual Benefit and Administration CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)
	<b>Associated Goals</b>	HS-1 Housing Development HS-2 Housing Rehabilitation HS-3 Homeownership HS-4 Fair Housing HS-5 Project Delivery

	<b>Description</b>	There is a need to improve the quality of the housing stock in the community by increasing the amount of decent, safe, sound, and accessible housing for homeowners, renters, and homebuyers that is affordable to low- and moderate-income persons and families.
	<b>Basis for Relative Priority</b>	There is a need to improve the quality and quantity of the housing stock available in the community that is decent, safe, sound, and accessible for home buyers, home owners, and renters.
2.	<b>Priority Need Name</b>	<b>Homeless Strategy</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	<b>Geographic Areas Affected</b>	Non-targeted for Low-Mod Individual Benefit and Administration CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)
	<b>Associated Goals</b>	HMS-1 Housing HMS-2 Operation/Support HMS-3 Prevention and Re-Housing

	<b>Description</b>	There is a need for housing and support services for homeless persons and persons at-risk of becoming homeless.
	<b>Basis for Relative Priority</b>	The needs were identified based on consultation with the Continuum of Care and its participating agencies.
<b>3.</b>	<b>Priority Need Name</b>	Other Special Needs Strategy
	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	Non-targeted for Low-Mod Individual Benefit and Administration CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)
	<b>Associated Goals</b>	SNS-1 Housing SNS-2 Social Services SNS-3 Accessibility

	<b>Description</b>	There is a continuing need for affordable housing, services, and facilities for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs.
	<b>Basis for Relative Priority</b>	These priorities were developed using statistical data, special needs specific consultation, and resident input.



4.	<b>Priority Need Name</b>	<b>Community Development Strategy</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	Non-targeted for Low-Mod Individual Benefit and Administration CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)
	<b>Associated Goals</b>	CDS-1 Community facilities CDS-2 Infrastructure CDS-3 Public Services CDS-4 Code Enforcement CDS-5 Public Safety CDS-6 Clearance/Demolition CDS-7 Accessibility Improvements CDS-8 Transportation

	<b>Description</b>	There is a need to improve the public and community facilities, infrastructure and accessibility, public safety, clearance, and the quality of life for all residents in the community.
	<b>Basis for Relative Priority</b>	These needs were developed using statistical data, consultations, and resident participation.
5.	<b>Priority Need Name</b>	<b>Economic Development Strategy</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents veterans Non-housing Community Development Other
	<b>Geographic Areas Affected</b>	Non-targeted for Low-Mod Individual Benefit and Administration CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)
	<b>Associated Goals</b>	EDS-1 Employment EDS-2 Development EDS-3 Redevelopment EDS-4 Access to Transportation
	<b>Description</b>	There is a need to increase employment, job training, technical assistance, redevelopment, and transportation of low- and moderate-income residents in the City.
	<b>Basis for Relative Priority</b>	These needs were developed using statistical data, consultations, and resident participation.
6.	<b>Priority Need Name</b>	<b>Administration, Planning, and Management Strategy</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Non-housing Community Development Other
	<b>Geographic Areas Affected</b>	Non-targeted for Low-Mod Individual Benefit and Administration CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)

	Associated Goals	AMS-1 Overall Coordination
	Description	There is a continuing need for planning, administration, management, and oversight of federal, state, and local funded programs.
	Basis for Relative Priority	These needs were developed from consultations.

### Narrative (Optional)

The priority ranking of needs for housing, homelessness, other special needs, community development, economic development, and administration are as follows:

- **High Priority** - Activities are assigned a high priority if the City expects to fund them during the Five-Year Consolidated Plan period.
- **Low Priority** - Activities are assigned a low priority if the activity may not be funded by the City during the Five-Year Consolidated Plan period. The City may support applications for other funding if those activities are consistent with the needs identified in the Five-Year Consolidated Plan.

**SP-30 Influence of Market Conditions – 91.215 (b)****Influence of Market Conditions**

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
<b>Tenant Based Rental Assistance (TBRA)</b>	The City of Rockford Department of Human Services can assist with one month of rent assistance for tenants in order to prevent homelessness, or for individuals whose homes have been condemned.
<b>TBRA for Non-Homeless Special Needs</b>	The City of Rockford Department of Human Services can assist with one month of payments for individuals whose homes have been condemned.
<b>New Unit Production</b>	There are numerous vacant sites in residential areas that the City can utilize for new infill housing construction and for new rental construction. New construction will permit the design of housing that is accessible for the special needs populations. However, cost is a factor, and is driven up by the IHPA guidelines. Resources are limited, so only a finite amount of new housing units can be produced.
<b>Rehabilitation</b>	There is a significant need to rehabilitate housing in the City of Rockford. The City needs affordable, accessible, decent, safe, and sanitary housing that could be accomplished through rehabilitation. However, cost is a factor, and is driven up by the IHPA guidelines. Resources are limited, so only a finite amount of housing units can be rehabilitated.
<b>Acquisition, including preservation</b>	<p>The City has developed guidelines for historic presentation that can be found in the City Zoning Ordinance and Historic Guidelines for each one of these districts. These are:</p> <ul style="list-style-type: none"> <li>• Haight Village</li> <li>• Garfield Avenue</li> <li>• Indian Terrace</li> <li>• Brown's Hill/Knightsville</li> <li>• Northeast State &amp; Main</li> <li>• Peacock Brewery</li> </ul> <p>In addition, the City also has districts listed on the National Register of Historic Places. These are:</p> <ul style="list-style-type: none"> <li>• East Rockford</li> <li>• Haight Village</li> <li>• 7th Street Commercial</li> <li>• Barber-Colman Company</li> <li>• West Downtown Rockford</li> <li>• Garrison-Cornado-Haskell</li> </ul> <p>Rockford has a local Historic Preservation Commission that provides proactive and practical guidance and resources to preserve structures and neighborhoods of historic significance.</p>

**Table 49 – Influence of Market Conditions**

**SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)****Introduction**

The City of Rockford is receiving \$2,171,919 in CDBG funds, \$982,552 in HOME funds, and \$184,641 in ESG funds for the FY 2020 program year. The program year goes from January 1, 2020 to December 31, 2020. These funds will be used to address the following priority needs: Housing; Homeless; Other Special Needs; Community Development; Economic Development; and Administration, Planning, and Management.

The accomplishments of these projects/activities will be reported in the FY 2020 Consolidated Annual Performance and Evaluation Report (CAPER).

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$2,171,919	\$8,000	\$0	<b>\$2,179,919</b>	\$8,687,676	8 Projects/activities were based on the FY 2020 CDBG allocations.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
<b>HOME</b>	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$982,552	\$5,440	\$0	<b>\$987,992</b>	\$3,930,208	5 Projects/activities were based on the FY 2020 HOME allocations.
<b>ESG</b>	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$184,641	\$0	\$0	<b>\$184,641</b>	\$738,564	1 Projects/activities were based on the FY 2020 ESG allocations.

Table 50 - Anticipated Resources

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

Various departments of the City leverage entitlement and other public dollars with private, state and local resources. They include, but are not limited to, the following:

**Public:**

- United States Environmental Protection Agency
- Office of Administration for Children and Families – Community Services Block Grant
- Department of Energy – Weatherization Assistance Program

In addition, the City of Rockford is eligible to make application to HUD for five times the current CDBG entitlement for application of Section 108 Loan Guarantee funds. Section 108 can be used to fund economic development, housing, public facilities, infrastructure, and other physical development projects, including improvements to increase resilience against natural disasters.

**Private:**

- **Housing rehabilitation** – If the cost of rehabilitation exceeds the City's program maximums, property owners can invest their own savings, or seek loans from a financial institution. Homeownership is gap financing. Therefore, first mortgage financing is provided by mortgage lenders. Some homebuyers may qualify for additional homebuyer assistance through a Federal Home Loan Bank of Chicago housing program. In addition, most homebuyers are required to invest their own savings. In the past, the City has supplemented housing rehabilitation programs with Federal Home Loan Bank of Chicago (FHLBC) competitive grants. Traditionally competitive grant applications are accepted annually. Development assistance is gap financing. Therefore, developers may seek bridge loans and/or permanent financing from financial institutions, Community Development Financial Institutions, investors through Low Income Housing Tax Credit programs, deferred developer fee, donations, etc. Economic Development (ED) Some ED programs require beneficiaries to provide their own funds as leverage. This may be their own savings, or a loan from a financial institution, etc.

**State:**

The City will continue to seek competitive grant funding through the Illinois Housing Development Authority (IHDA) for housing and community development. Most recently, funds have been awarded to supplement the City's Demolition and Clearance programs. The City plans to apply for future funding as it becomes available.

In addition, IHDA has homeownership programs which provide first mortgage financing and downpayment assistance. These funds are provided to homebuyers through financial institutions approved by IHDA.

**Local:**

Some local programs include, but are not limited to, the following:

- The Winnebago County Health Department
- The Rockford Area Habitat for Humanity
- The Community Foundation of Northern Illinois
- Tax Increment Financing Districts

**HOME and ESG Match Requirements:**

The City's HOME match requirement of 25% has been met; having an excess amount of \$1,078,723 from previous years. The match requirement is generally met through housing developments. However, the City does report other match funds as they become available. For homeownership this might be volunteer labor on a Habitat home that was purchased using the City's homeownership program. For housing rehabilitation projects, this could include capital improvements completed in the area.

The City anticipates that it will have ESG match of \$180,781 from local and state funds. In addition to local and state funds, match consists of donations and grants to ESG sub-grantees.



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

In general, the City does not intend to acquire or improve land, property, or buildings with CDBG funds. However, the City reserves the right to utilize CDBG funds for such acquisitions, should there be an appropriate and vetted project.

**Discussion**

Not Applicable.

**SP-40 Institutional Delivery Structure – 91.215(k)**

*Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.*

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Rockford	Government	Economic Development Homelessness Non-homeless special needs Planning neighborhood improvements public facilities public services	Jurisdiction
Rockford Housing Authority	PHA	Public Housing	Jurisdiction
Rock River Homeless Coalition	Continuum of care	Homelessness Planning	Other

**Table 51 - Institutional Delivery Structure**

**Assess of Strengths and Gaps in the Institutional Delivery System**

The City of Rockford Department of Community and Economic Development coordinates with other City Departments, Region 1 Planning Council, Winnebago County, the Rock River Homeless Coalition, as well as private and non-profit entities addressing housing, homelessness, special needs, community development & economic development. Gaps exist among the available resources due to a high demand for assistance and limited funding availability for activities such as home/rental rehabilitation or home modifications for the elderly and people with disabilities, as well as gaps in social and public services such as job training and transportation.

**Availability of services targeted to homeless persons and persons with HIV and mainstream services**

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	
Legal Assistance	X	X	

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Mortgage Assistance	X	X	
Rental Assistance	X	X	
Utilities Assistance	X	X	
<b>Street Outreach Services</b>			
Law Enforcement	X		
Mobile Clinics			
Other Street Outreach Services	X	X	
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X	X	X
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X	X	
<b>Other</b>			

Table 52 - Homeless Prevention Services Summary

**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

The services targeted to homeless persons, persons with HIV/AIDS, and mainstream services are made available through the coordination of non-profit service providers that constitute the Rock River Homeless Coalition. These organizations partner with each other, the City of Rockford, and mainstream service providers to provide a wide-ranging response to the service needs of homeless persons and persons with HIV/AIDS, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

The Rock River Homeless Coalition is a member of Built for Zero, a national movement to end homelessness; Rockford has reached “functional zero” for veterans and those who are chronically homeless. This means the City has reached a target number (seven for veterans and three for chronic) and has been able to maintain that number for over 90 days. It also means service providers rapidly rehouse newly homeless veterans and new chronically homeless in less than 30 days.

The primary barrier for many homeless individuals is the lack of sufficient income to afford housing. The City of Rockford has seen an increase in homeless individuals who are elderly, in addition to approximately 3,000 youth that are considered homeless by the Rockford School District 205. There is an increasing need for affordable mental health services for the homeless and chronically homeless.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

The City of Rockford will assist providers who operate housing and support services for the homeless and persons at risk of being homeless, including those with special needs. The City of Rockford also continues to work with the Housing Authority to provide a more streamlined process for chronically homeless individuals and to address gaps in services and promote self-sufficiency.

**SP-45 Goals Summary – 91.215(a)(4)****Goals Summary Information**

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1.	<b>HS-1 Housing Development</b>	2020	2024	Affordable Housing	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Housing Strategy	CDBG: \$0 HOME: \$1,283,890 ESG: \$0	Rental units constructed: 0 Household Housing Unit  Rental units rehabilitated: 0 Household Housing Unit  Homeowner Housing Added: 0 Household Housing Unit  Homeowner Housing Rehabilitated: 0 Household Housing Unit  Other: 10 Other
2.	<b>HS-2 Housing Rehabilitation</b>	2020	2024	Affordable Housing	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Housing Strategy	CDBG: \$3,450,000 HOME: \$2,754,420 ESG: \$0	Rental units rehabilitated: 0 Household Housing Unit  Homeowner Housing Rehabilitated: 275 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3.	<b>HS-3 Homeownership</b>	2020	2024	Affordable Housing	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Housing Strategy	CDBG: \$0 HOME: \$383,175 ESG: \$0	Direct Financial Assistance to Homebuyers: 25 Households Assisted
4.	<b>HS-4 Fair Housing</b>	2020	2024	Affordable Housing	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Housing Strategy	CDBG: \$50,000 HOME: \$0 ESG: \$0	Other: 5 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5.	HS-5 Project Delivery	2020	2024	Affordable Housing	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Housing Strategy	CDBG: \$2,011,740 HOME: \$0 ESG: \$0	Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted  Rental units constructed: 0 Household Housing Unit  Rental units rehabilitated: 0 Household Housing Unit  Homeowner Housing Added: 5 Household Housing Unit  Homeowner Housing Rehabilitated: 275 Household Housing Unit  Direct Financial Assistance to Homebuyers: 25 Households Assisted  Other: 10 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6.	HMS-1 Housing	2020	2024	Homeless	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Homeless Strategy	CDBG: \$0 HOME: \$0 ESG: \$340,000	<p>Tenant-based rental assistance / Rapid Rehousing: 0 Households Assisted</p> <p>Homeless Person Overnight Shelter: 0 Persons Assisted</p> <p>Overnight/Emergency Shelter/Transitional Housing Beds added: 0 Beds</p> <p>Homelessness Prevention: 0 Persons Assisted</p> <p>Other: 5 Other</p>



Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7.	<b>HMS-2 Operation/Support</b>	2020	2024	Homeless	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Homeless Strategy	CDBG: \$0 HOME: \$0 ESG: \$225,000	Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted  Tenant-based rental assistance / Rapid Rehousing: 0 Households Assisted  Homeless Person Overnight Shelter: 0 Persons Assisted  Overnight/Emergency Shelter/Transitional Housing Beds added: 0 Beds  Homelessness Prevention: 0 Persons Assisted  Other: 10 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8.	<b>HMS-3 Prevention and Re-Housing</b>	2020	2024	Homeless	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Homeless Strategy	CDBG: \$0 HOME: \$0 ESG: \$289,890	Tenant-based rental assistance / Rapid Rehousing: 0 Households Assisted  Homelessness Prevention: 0 Persons Assisted  Other: 5 Other
9.	<b>SNS-1 Housing</b>	2020	2024	Non-Homeless Special Needs	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Other Special Needs Strategy	CDBG: \$0 HOME: \$0 ESG: \$0	Rental units constructed: 0 Household Housing Unit  Rental units rehabilitated: 0 Household Housing Unit  Homeowner Housing Added: 0 Household Housing Unit  Homeowner Housing Rehabilitated: 0 Household Housing Unit  Other: 0 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10.	<b>SNS-2 Social Services</b>	2020	2024	Non-Homeless Special Needs	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Other Special Needs Strategy	CDBG: \$0 HOME: \$0 ESG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted  Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted  Other: 0 Other

11.	<b>SNS-3 Accessibility</b>	2020	2024	Non-Homeless Special Needs	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Other Special Needs Strategy	CDBG: \$0 HOME: \$0 ESG: \$0	<p>Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted</p> <p>Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 0 Households Assisted</p> <p>Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted</p> <p>Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted</p> <p>Rental units constructed: 0 Household Housing Unit</p> <p>Rental units rehabilitated: 0 Household Housing Unit</p> <p>Homeowner Housing Added: 0 Household Housing Unit</p> <p>Homeowner Housing Rehabilitated: 0 Household Housing Unit</p> <p>Other: 0 Other</p>
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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
12.	<b>CDS-1 Community facilities</b>	2020	2024	Non-Housing Community Development	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Community Development Strategy	CDBG: \$0 HOME: \$0 ESG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted  Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 0 Households Assisted  Other: 0 Other
13.	<b>CDS-2 Infrastructure</b>	2020	2024	Non-Housing Community Development	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Community Development Strategy	CDBG: \$0 HOME: \$0 ESG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted  Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 0 Households Assisted  Other: 0 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
14.	<b>CDS-3 Public Services</b>	2020	2024	Non-Housing Community Development	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Community Development Strategy	CDBG: \$0 HOME: \$0 ESG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted  Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted  Other: 0 Other
15.	<b>CDS-4 Code Enforcement</b>	2020	2024	Non-Housing Community Development	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Community Development Strategy	CDBG: \$0 HOME: \$0 ESG: \$0	Housing Code Enforcement/Foreclosed Property Care: 0 Household Housing Unit  Other: 0 Other
16.	<b>CDS-5 Public Safety</b>	2020	2024	Non-Housing Community Development	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Community Development Strategy	CDBG: \$0 HOME: \$0 ESG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted  Other: 0 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
17.	<b>CDS-6 Clearance/Demolition</b>	2020	2024	Non-Housing Community Development	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Community Development Strategy	CDBG: \$2,067,705 HOME: \$0 ESG: \$0	Buildings Demolished: 175 Buildings
18.	<b>CDS-7 Accessibility Improvements</b>	2020	2024	Non-Housing Community Development	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Community Development Strategy	CDBG: \$0 HOME: \$0 ESG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted  Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 0 Households Assisted  Other: 0 Other
19.	<b>CDS-8 Transportation</b>	2020	2024	Non-Housing Community Development	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Community Development Strategy	CDBG: \$0 HOME: \$0 ESG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted  Other: 0 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
20.	<b>EDS-1 Employment</b>	2020	2024	Economic Development	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Economic Development Strategy	CDBG: \$977,855 HOME: \$0 ESG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted  Jobs created/retained: 0 Jobs  Businesses assisted: 15 Businesses Assisted  Other: 0 Other
21.	<b>EDS-2 Development</b>	2020	2024	Economic Development	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Economic Development Strategy	CDBG: \$415,990 HOME: \$0 ESG: \$0	Facade treatment/business building rehabilitation: 0 Business  Jobs created/retained: 0 Jobs  Businesses assisted: 15 Businesses Assisted  Other: 0 Other



Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
22.	<b>EDS-3 Redevelopment</b>	2020	2024	Economic Development	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Economic Development Strategy	CDBG: \$0 HOME: \$0 ESG: \$0	Facade treatment/business building rehabilitation: 0 Business  Brownfield acres remediated: 0 Acre  Businesses assisted: 0 Businesses Assisted  Other: 0 Other
23.	<b>EDS-4 Access to Transportation</b>	2020	2024	Economic Development	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Economic Development Strategy	CDBG: \$0 HOME: \$0 ESG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted  Other: 0 Other
24.	<b>AMS-1 Overall Coordination</b>	2020	2024	Administration, Planning, and Management	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Administration, Planning, and Management Strategy	CDBG: \$1,886,305 HOME: \$491,275 ESG: \$68,315	Other: 15 Other

Table 53 – Goals Summary

**Goal Descriptions**

1.	Goal Name	HS-1 Housing Development
	Goal Description	Increase the number of affordable housing units in the City for owners and renters by assisting with acquisition, development fees, construction, and rehabilitation.
2.	Goal Name	HS-2 Housing Rehabilitation
	Goal Description	Continue to assist with rehabilitating existing affordable housing units occupied by owners and renters in the City by addressing code violations, emergency repairs, energy efficiency improvements, and handicap accessibility.
3.	Goal Name	HS-3 Homeownership
	Goal Description	Continue to assist low- and moderate-income homebuyers to purchase homes by providing direct subsidies which include but are not limited to down payment and closing cost assistance including housing counseling fees, interest subsidies, etc.
4.	Goal Name	HS-4 Fair Housing
	Goal Description	Promote fair housing choice through education, testing, training, and outreach in the City of Rockford.
5.	Goal Name	HS-5 Project Delivery
	Goal Description	Provide eligible program delivery and oversight for the CDBG and HOME funded housing projects/activities.
6.	Goal Name	HMS-1 Housing
	Goal Description	Support the Continuum of Care's efforts and applicants to provide emergency shelter, transitional housing, permanent supportive housing, and other permanent housing opportunities.
7.	Goal Name	HMS-2 Operation/Support
	Goal Description	Assist providers who operate housing or provide support services for the homeless and persons or families at-risk of becoming homeless.

8.	Goal Name	HMS-3 Prevention and Re-Housing
	Goal Description	Assist the Continuum of Care's efforts in prevention of homelessness through anti-eviction activities and program for rapid re-housing.
9.	Goal Name	SNS-1 Housing
	Goal Description	Increase the supply of affordable, accessible, decent, safe, and sanitary housing for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs through rehabilitation of existing buildings and new construction.
10.	Goal Name	SNS-2 Social Services
	Goal Description	Support social service programs and facilities for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs.
11.	Goal Name	SNS-3 Accessibility
	Goal Description	Promote and assist in making accessibility improvements for homeowners, making reasonable accommodations, and bring public facilities and infrastructure into compliance with Federal and State Laws.
12.	Goal Name	CDS-1 Community facilities
	Goal Description	Improve parks, bikeways and trails, recreational facilities, and all public and community facilities including accessibility improvements to public buildings and all community facilities in the City.
13.	Goal Name	CDS-2 Infrastructure
	Goal Description	Improve the public infrastructure through rehabilitation, reconstruction, and new construction, of streets, sidewalks, bridges, curbs, walkways, water, storm water, sanitary sewer, handicap accessibility improvements/removal of architectural barriers, etc.
14.	Goal Name	CDS-3 Public Services
	Goal Description	Improve and enhance public services, programs for youth, the elderly, disabled, and general public service programs for low- and moderate-income persons.

15.	Goal Name	CDS-4 Code Enforcement
	Goal Description	Undertake code enforcement activities to maintain the existing housing stock in the City.
16.	Goal Name	CDS-5 Public Safety
	Goal Description	Improve public safety facilities, equipment, crime prevention, community policing, and ability to respond to emergency situations in the City.
17.	Goal Name	CDS-6 Clearance/Demolition
	Goal Description	Remove and eliminate slum and blighting conditions through demolition of vacant, abandoned, and dilapidated structures.
18.	Goal Name	CDS-7 Accessibility Improvements
	Goal Description	Improve handicap accessibility improvements and removal of architectural barriers to public and community facilities.
19.	Goal Name	CDS-8 Transportation
	Goal Description	Support the expansion of transportation options to assist low- and moderate-income residents in the City.
20.	Goal Name	EDS-1 Employment
	Goal Description	Support and encourage job creation, job retention, and job training opportunities.
21.	Goal Name	EDS-2 Development
	Goal Description	Support business and commercial growth through rehabilitation of store fronts and retail space, expansion of businesses, and the development of new businesses.
22.	Goal Name	EDS-3 Redevelopment
	Goal Description	Plan and promote the development, redevelopment, and revitalization of vacant and underutilized commercial and industrial sites.

23.	Goal Name	EDS-4 Access to Transportation
	Goal Description	Support the expansion of public transportation and access to bus and automobile service to assist residents to get to work or training opportunities.
24.	Goal Name	AMS-1 Overall Coordination
	Goal Description	Provide program management and oversight for the successful administration of Federal, State, and locally funded programs, including planning services for special studies, annual action plans, five year consolidated plans, substantial amendments, consolidated annual performance and evaluation reports (CAPER), environmental reviews and clearances, fair housing, and compliance with all Federal, State, and local laws and regulations.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

The City of Rockford through its CDBG, HOME, and ESG funds propose to assist the following:

- **Extremely Low-Income** - 40 families
- **Low-Income** - 115 families
- **Moderate-Income** - 155 families

In addition, the City, through its ESG funds, proposes to assist households through its Rapid Re-Housing and Homeless Prevention Programs.

## **SP-50 Public Housing Accessibility and Involvement – 91.215(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

Rockford Housing Authority currently operates a total of 1,923 public housing units HUD requires that a minimum of 5% of Public Housing Units must be accessible; currently 11.2% of the Housing Authority of Rockford's units are accessible. The current waiting list for Elderly/disabled housing is 570 applicants.

It is the policy of the Rockford Housing Authority that, "Newly-constructed facilities must be designed to be readily accessible to and usable by persons with disabilities. Alterations to existing facilities must be accessible to the maximum extent feasible, defined as not imposing an undue financial and administrative burden on the operations of the public housing program."

### **Activities to Increase Resident Involvements**

The Rockford Housing Authority (RHA) has several opportunities for resident involvement. They are as follows:

- **Housing Occupants Mobilization Effort (HOME):** HOME is an organization that has the responsibility of working with RHA and Resident Leadership Councils (RLCs) for the good of all. It is comprised of RHA residents elected from RLCs. The HOME Board addresses issues which affect the quality of life of public housing residents. The HOME/RAB is the governing agency of all RHA's RLCs. HOME/RAB Executive officers, in partnership with appropriate RHA staff, assist RLCs and residents at each site with the organization and functioning of the RLCs. RHA staff provides technical assistance to the HOME/RAB and RLCs to ensure compliance with HUD guidelines and requirements.
- **Resident Leadership Councils (RLCs):** RLC's serve as tenant organizations for a development or a building of RHA-managed property. The principal purposes of the RLC are: Advocate for residents before RHA and other agencies, and act as a liaison between such agencies. Aid in the evaluation of physical and social conditions at respective developments or buildings. Encourage programs and activities designed to promote independence, self-sufficiency, community and quality of life. Encourage good working relationships between residents, HOME/RAB and RHA staff. Aid in determining the needs of each development or building. Provide a forum for sharing of information about RHA and its programs and offerings. Make reformations to the development of the RHA capital and annual plans. RHA Family Self-Sufficiency (FSS): RHA encourages residents to participate in FSS programing which breaks down into four (4) different paths. These are ReBuild, ReStart: Empowerment & Life Skills Building, Rethink: Educational Development & Networking, and Recreate: Special Programs and Initiatives. Each of these tracts offer unique programming to fit the needs of the resident. **ReBuild:** helps Residents reach short and long term

goals to become self-sufficient. Residents receive direct services assistance, service coordination, and case management. **ReStart:** Empowerment & Life Skills Building focuses on Personal Empowerment & Goals, Health & Wellness, Housekeeping & Independent Living, and Parenting & Early Learning. **ReThink:** Educational Development & Networking focuses on Financial Education & Planning, Employment & Education, Digital Literacy, Leadership Development, and Homeownership. **Recreate:** Special Programs and Initiatives has special programs and initiatives such as ConnectHome, New Mix & Craft Entrepreneurship, and Resident Leadership Council. Resident Opportunities for Self-Sufficiency (ROSS): The ROSS program works closely with individual work plans related to employment, education, and strategies to reduce and eliminate subsidy assistance. A team of ROSS Case Managers work closely with residents to develop work plans to meet individual goals and they connect residents with local agencies and services that provide additional supportive services and resources needed to achieve success.

**Is the public housing agency designated as troubled under 24 CFR part 902?**

No

**Plan to remove the ‘troubled’ designation**

Not Applicable.

## SP-55 Barriers to affordable housing – 91.215(h)

### Barriers to Affordable Housing

The City of Rockford in its most recent Analysis of Impediments to Fair Housing Choice identified that the City of Rockford does not have a definition for “disabled” or “handicapped” in the general terms of the zoning code. There were no other negative effects of its public policies identified that would serve as barriers to affordable housing. The City has continued to revise and update its Zoning Ordinance the most recent update being in March 2017.

There are no known public policies in the City of Rockford that are a barrier to affordable housing. The City’s Department of Community and Economic Development monitors the following:

- Construction and Development Services
- Neighborhood Standards
- Neighborhood Development
- Economic Development
- Long Range Planning

The City of Rockford’s FY 2020-2024 Analysis of Impediments to Fair Housing Choice has identified the following impediments:

- **Impediment 1: Fair Housing Education and Outreach.** There is a need to educate persons about their rights under the Fair Housing Act and to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities and the disabled population who fear retaliation if they lodge a complaint.
- **Impediment 2: Need for Decent, Safe, and Affordable Rental Housing.** The City of Rockford does not have a sufficient supply of rental housing that is decent, safe, and sound. In many cases, landlords often don’t maintain their property to code standard which results in unsafe living conditions for tenants. However, the monthly cost of rent for apartments has steadily increased due to the limited supply of rental housing, despite the condition of the rental unit.
- **Impediment 3: Lack of Affordable Homeownership Opportunities.** The population of Rockford has decreased since the 2010 U.S. Census and the percentage of share of renters has increased from 39%-46%. In some areas, the share of renters is as high as 70% or more. Home values and access to traditional mortgage financing have decreased since the recession, partly due to significantly higher credit standards and the age of Rockford’s housing stock. Homes within an affordable price range require rehabilitation, which limits the availability of mortgage financing programs for lower income households.
- **Impediment 4: Need for Accessible Housing Units That Are For-Sale or Rent.** There is a lack of accessible housing units in the City of Rockford. Most of the existing housing units do not have accessible features. The City’s disabled population has grown to 15.5% of the total population.



- **Impediment 5: Economic Issues that affect Fair Housing Choice.** There is a lack of economic opportunities in the City which prevent low-income households from improving their income and ability to live outside areas with concentrations of low-income households, which makes this a fair housing concern.

## **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

Fair housing is essential to ensuring that persons of all income levels, race, religion and ethnicity have equal access to safe, decent, sound, and affordable housing in the City of Rockford. The City of Rockford completed its Analysis of Impediments to Fair Housing Choice and is submitting as part of the Five Year Consolidated Plan. Listed below are the new impediments and strategies:

### **Impediment 1: Fair Housing Education and Outreach**

There is a need to educate persons about their rights under the Fair Housing Act and to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities and the disabled population who fear retaliation if they lodge a complaint.

**Goal:** The public in general and local officials will become knowledgeable and aware of the Fair Housing Act, related laws, regulations, and requirements to affirmatively further fair housing in the city.

**Strategies:** In order to meet this goal, the following activities and strategies should be undertaken:

- **1-A:** Continue to promote Fair Housing awareness through the media, seminars, testing, and training to provide educational opportunities for all persons to learn more about their rights under the Fair Housing Act and Americans With Disabilities Act.
- **1-B:** Continue to distribute literature and informational material concerning fair housing issues, an individual's housing rights, and landlord's responsibilities to affirmatively further fair housing.
- **1-C:** Promote housing choice so residents with the same financial means may choose to live anywhere in the City.

### **Impediment 2: Need for Decent, Safe, and Affordable Rental Housing**

The City of Rockford does not have a sufficient supply of rental housing that is decent, safe, and sound. In many cases, landlords often don't maintain their property to code standard which results in unsafe living conditions for tenants. However, the monthly cost of rent for apartments has steadily increased due to the limited supply of rental housing, despite the condition of the rental unit.

**Goal:** The supply of affordable rental housing that is decent, safe, and sound will meet the needs of all renter households throughout the City of Rockford, through new construction and in-fill housing, the rehabilitation of existing occupied structures and vacant buildings, and the development of mixed-income buildings.

**Strategies:** In order to meet this goal, the following activities and strategies should be undertaken:

- **2-A:** Support and encourage both private developers and non-profit housing providers to develop and construct new affordable mixed and middle income rental housing that would be located throughout the City of Rockford.
- **2-B:** Support and encourage the rehabilitation of existing housing units in the City to create decent, safe, and sound rental housing that is affordable to lower income households.
- **2-C:** Continue to provide funding for Code Enforcement to identify buildings and units that need to be maintained and rehabilitated in accordance with local codes.

### **Impediment 3: Lack of Affordable Homeownership Opportunities**

The population of Rockford has decreased since the 2010 U.S. Census and the percentage of share of renters has increased from 39%-46%. In some areas, the share of renters is as high as 70% or more.

Home values and access to traditional mortgage financing have decreased since the recession, partly due to significantly higher credit standards and the age of Rockford's housing stock. Homes within an affordable price range require rehabilitation, which limits the availability of mortgage financing programs for lower income households.

**Goal:** For-sale single family homes for lower income households will be developed through new construction, in-fill housing, and rehabilitation of substandard houses.

**Strategies:** In order to meet this goal, the following activities and strategies should be undertaken:

- **3-A:** Support homebuyer education and training programs to improve homebuyer awareness and increase the opportunities for lower-income households to become homebuyers.
- **3-B:** Support and provide funds for downpayment assistance to lower-income households to become homeowners.
- **3-C:** Support and encourage plans from both private developers and non-profit housing providers to develop and construct new affordable housing that is for-sale.
- **3-D:** Support and encourage the acquisition, rehabilitation and resale of existing housing units to become decent, safe, and sound.
- **3-E:** Partner with private and non-profit developers to Increase opportunities for 'lease purchase' housing

### **Impediment 4: Need for Accessible Housing Units That Are For-Sale or Rent**

There is a lack of accessible housing units in the City of Rockford. Most of the existing housing units do not have accessible features. The City's disabled population has grown to 15.5% of the total population.

**Goal:** Increase the number of accessible housing units through new construction and rehabilitation of existing housing units for the physically disabled and developmentally delayed.

**Strategies:** In order to meet this goal, the following activities and strategies should be undertaken:

- **4-A:** Support home rehabilitation programs that financially assist seniors and people with disabilities to provide a safe and accessible home in order to continue to age in place.
- **4-B:** Support and encourage the development of accessible housing units in the City.
- **4-C:** Provide fair housing education and outreach to seniors and people with disabilities to address fear of reporting housing and code violations.
- **4-D:** Enforce the ADA and Fair Housing requirements for landlords to make “reasonable accommodations” to their rental properties so they become accessible to tenants with disabilities.

#### **Impediment 5: Economic Issues that affect Fair Housing Choice**

There is a lack of economic opportunities in the City which prevent low-income households from improving their income and ability to live outside areas with concentrations of low-income households, which makes this a fair housing concern.

**Goal:** The local economy will provide new job opportunities, which will increase household income, and will promote fair housing choice.

**Strategies:** In order to meet this goal, the following activities and strategies should be undertaken.

- **5-A:** Continue to provide support, education, and technical assistance opportunities to minority, women owned and small businesses.
- **5-B:** Support and enhance workforce development and skills training that result in a “livable wage” and increases job opportunities.
- **5-C:** Continue to promote and encourage economic development with local commercial and industrial firms to expand their operations and increase employment opportunities.
- **5-D:** Support and encourage efforts for improvements in public transportation options in the City to allow for second and third shift workers.
- **5-E:** Support and encourage private and non-profit developers and businesses to provide assets (grocery stores, services, etc.) in low to moderate income neighborhoods.

## **SP-60 Homelessness Strategy – 91.215(d)**

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

The Rock River Homeless Coalition includes a broad representation of relevant organizations and agencies as well as interested individuals charged with:

- community-wide planning and strategic use of resources to address homelessness;
- improving coordination and integration with mainstream resources and other programs targeted to people experiencing homelessness;
- promoting the quick re-housing of homeless individuals and families
- improving data collection and performance measurement to ensure program success

The City of Rockford Department of Human Services Community Service Division has a street outreach team to identify homeless individuals and get them into emergency and eventually permanent shelter. Individuals needs are assessed during street outreach to make referrals for services if an individual does not want shelter assistance.

### **Addressing the emergency and transitional housing needs of homeless persons**

The Rockford Rescue Mission, a member of the Continuum of Care, places a great emphasis on helping individuals who are victims of domestic violence and abuse. The City of Rockford also has worked with the Rockford Police Department to help identify the risks of domestic violence and to keep victims in their homes while removing the perpetrator.

The City is also facing an increase in the amount of aging homeless as homes become more difficult and expensive to maintain. The City of Rockford Human Services Department offers short term monetary assistance in order to keep individuals and families in their homes.

Veteran and chronic homelessness has reached “functional zero” in the City of Rockford.

**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 coalition is a member of Built for Zero, a national movement to end homelessness; Rockford has reached functional zero for veterans and those who are chronically homeless. This means the City has reached a target number (seven for veterans and three for chronic) and has been able to maintain that number for over 90 days. It also means service providers rapidly rehouse newly homeless veterans and new chronically homeless in less than 30 days.

The City of Rockford's Department of Human Services Community Service Division offers three housing assistance programs. These are: rapid rehousing, homeless prevention, and condemnation relocation.

The Community Service Division offers a Chance4Change/Homeless Single Point of Entry to help all literally homeless persons (on streets or in shelters) as well as homeless youth, veterans and survivors of domestic violence access housing services.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

The City of Rockford Human Services Department is the designated public Community Action Agency for Winnebago and Boone Counties. Community Action Agencies exist to break the cycle of generational poverty and to mitigate the immediate effects of poverty on individuals, families and neighborhoods.

As a Community Action Agency, the Human Services Department provides services to individuals, families, and neighborhoods in Rockford as well as in greater Winnebago and Boone Counties. This is accomplished by addressing systemic, community and individual factors. Key strategies include provision of direct services, partnering, collaborations and advocacy. Services are administered under two Divisions with input from a Community Action Board and the Head Start Policy Council.

## **SP-65 Lead based paint Hazards – 91.215(i)**

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

According to 2013-2017 American Community Survey Data approximately 77% of the housing stock in the City of Rockford was built prior to 1979. This makes the possible incidence and associated hazards of lead-based paint extremely high.

The revised Federal lead-based paint regulations published on September 15, 1999 (24 CFR Part 35) have had a significant impact on many activities – rehabilitation, tenant based rental assistance, and property acquisition – supported by the CDBG and HOME programs. The City of Rockford will comply with Title 24 Part 35: Lead-Based Paint Poisoning Prevention in Certain Residential Structures (Current Rule).

### **How are the actions listed above related to the extent of lead poisoning and hazards?**

#### **Rehabilitation Programs:**

While complying with Title 24 Part 35, the City of Rockford will ensure that:

- Applicants for rehabilitation funding receive the required lead-based paint information, including notices, and understand their responsibilities.
- Properly certified people perform risk assessment, paint testing, lead hazard reduction, and post project lead clearances.
- Required lead hazard reduction work and protective measures are incorporated into project rehabilitation specifications.

#### **Homeownership Programs:**

While complying with Title 24 Part 35, the City of Rockford will ensure that:

- Applicants for homeownership assistance receive the required lead-based paint information, including notices, and understand their responsibilities.
- Proper visual assessments are performed to identify deteriorated paint in the dwelling unit, and common areas servicing the unit, and exterior surfaces of the building.
- Prior to occupancy, properly qualified persons perform paint stabilization and the dwelling passes a clearance exam.

Lead reduction involves the implementation of a lead-based paint treatments which will be carried out in conjunction with the City of Rockford's CDBG and HOME funded housing activities. The City partners with, and supports, the Winnebago County Health Department, who administers a "Creating Lead Safe Rockford" (CLSR) program. This program is funded by the U.S. Department of Housing and Urban

Development (HUD) to mitigate lead hazards for low/moderate income owner-occupied or rental homes in the region. The City recognizes the importance of addressing lead-based paint hazards and will continue to support partners with and/or apply for additional resources to support these efforts.

**How are the actions listed above integrated into housing policies and procedures?**

All City housing programs include, but are not limited to the responsibilities below. The City reserves the right to hire qualified 3rd parties to complete any of these tasks.

- Providing appropriate lead information, including notices, at appropriate times.
- Conduct initial home inspections to identify lead safety hazards. This may include a visual inspection, paint testing, risk assessments, and/or clearance. Paint testing includes testing painted surfaces by approved XRF and Spectrum Analyzers and where required, laboratory analysis (TCLP)
- Create scope of work which include specifications for lead treatment through interim controls or abatement.
- Ensure work was completed in a lead safe manner with the disposal of hazardous materials to approved landfill facilities, where required.
- Conduct safety audits.
- Financial management and recordkeeping of all funds.
- Qualification of households.
- Conduct Medical examinations, where necessary.
- Bidding/Procurement of qualified contractors.
- Relocation of households where required.
- Awarding of federal funds.
- Monitoring of construction work.
- Maintaining testing reports.
- Obtaining annual verifications of proper certifications related to lead.

## **SP-70 Anti-Poverty Strategy – 91.215(j)**

### **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

Approximately 22.2% of the City of Rockford's residents live in poverty, while only 15.3% of Winnebago County residents live in poverty and 13.5% of the State of Illinois residents live in poverty. Female-headed households with children are particularly affected by poverty at 54.6%.

The City's anti-poverty strategy is based on supporting workforce development including job-training services for low to moderate income residents. In addition, the City's strategy is to provide supportive assistance to small businesses.

The City over the next five (5) years plans to use its CDBG funds to fund the following types of economic development and anti-poverty programs include:

- Assist in job creation and retention
- Small businesses assistance, which could include workforce training or support services for new employees
- Revitalization efforts
- Commercial/industrial infrastructure development and redevelopment
- New commercial/industrial development

The City will also provide support of shelters and rapid rehousing/homeless prevention through the use of ESG funds.

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan**

Providing access to housing and increasing the supply of decent, safe, sound, and affordable housing is integrally tied to the City's anti-poverty strategy. The most successful way to implement this is through job training and creation/retention activities, improving the current housing stock to be safe, decent, sanitary, and affordable, and having support services available until self-sufficiency is achieved.



## **SP-80 Monitoring – 91.230**

**Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

The City encourages the use of MBEs/WBEs. Planned outreach activities, include, but are not limited to the following:

- The promotion and encouragement of minority and women-owned businesses and their participation in the City's procurement process as general contractors, subcontractors, and suppliers of goods and services.
- The City's purchasing staff will continue to seek quotes under \$25,000 from Minority- and Women- Owned Businesses that are certified as MBEs/WBEs by the City's Contract and Grant Compliance Officer.
- Businesses certified as MBEs and WBEs will be placed on the City's website for internal purchasers and for the community-at-large to recruit MBEs and WBEs for contracting, subcontracting, products, and services.
- Continue to network with local, state, federal, private agencies, and Rockford Public School District 205 and report on bid opportunities and organizations to enhance the contractual opportunities for minority and women business development.
- Administration of the City Council approved Procurement Policy that encourages the use of minority- and women-owned businesses in the City's procurement efforts.

The City maintains a process for certifying business as MBEs/WBEs, and recognizes certifications from the Illinois Department of Transportation, Illinois Central Management Services, and the City of Chicago as part of this process. As part of bid requirements, each bidder on contracts or commodity purchases and for all road and building construction projects is required to identify each MBE and WBE subcontractor they will use on the contract, including the estimated dollar amount of the subcontract and the percentage to total bid that will be awarded to MBE and WBE subcontractors.

Since 2014, the City has utilized the LCPtracker System for general contractors and subcontractors to report their certified payrolls for HUD, CDBG, EPA, and other federal government projects that need to report wages under the Davis Bacon Act regulations. Also, the LCPtracker System is used to collect certified payrolls and monitor compliance with the Illinois Prevailing Wage Act.

In addition, the Economic Development and Diversity Procurement Coordinator continue to engage with MBE/WBE and small businesses in the community to provide additional resources.

**Long Term Monitoring and Compliance:**

Monitoring of the three formula-funded programs is carried out primarily by the Community Development Compliance staff, with assistance from other Neighborhood Development, Economic Development, Legal, Human Services and Finance staff of the City. The level and frequency of monitoring is determined by the specific program or development agreement. Due diligence is conducted by various staff members before any funds are disbursed. HOME and CDBG activities are monitored by assigned staff to ensure that all projects meet housing code compliance and program compliance. Funding for the activities was disbursed incrementally, and each disbursement request was reviewed by the Housing Rehabilitation Specialist to ensure that the federal funds were adjudicated properly, per the program and agreement. Once the rehabilitation was complete and all activity funds had been disbursed, compliance and monitoring of the agreement was the responsibility of the Compliance unit. The Neighborhood Development Grants Compliance Supervisor ensured that all occupancy, maintenance, and other requirements for the rehabilitation program were met. The Compliance staff also monitored IDIS reports on a weekly basis to ensure that funds were being expended in a timely manner. Post-completion monitoring also included reviews of annual reports submitted for rental projects.

Neighborhood Development staff will continue to make appropriate revisions to program policy and procedures. HOME and CDBG long-term compliance is monitored by the Neighborhood Development staff through a set of spreadsheets and calendar tickler reminders on applicable projects. The City requires all homeowners who receive HOME funds to list the City as a loss payee, so that the City is notified if insurance policies are cancelled.

The City monitors ESG and CoC funded agencies through a combination of desktop monitoring and on site monitoring. The City utilizes the HUD monitoring guides as templates for monitoring sub recipients. Sub recipients receive written feedback consistently throughout the process and at the end of monitoring. They are provided technical assistance to help them overcome any monitoring deficiencies.

Human Services housing staff ensure that the federal funds are being allocated properly, per the program regulations. Once responses to the City's program RFP are received, housing staff review the applications and ensure that all applications meet the HUD regulation standard. The applications are then reviewed by a committee comprised of housing staff and CoC members. A recommendation is then made to the CoC Board. Following CoC Board review, a formal recommendation is made to City Council. ESG recipient costs are scrutinized monthly by both program and fiscal staff to ensure appropriate, eligible expenditures are being made. In addition, monitoring of projects is conducted annually with year one being a full review and year two being a desk review.

In January 2020, City Council approved the "City of Rockford Grant Policy" which will be followed by all City of Rockford employees when managing City grants. Additional procedures will be developed in 2020, including the management of sub-recipients.

## Expected Resources

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

#### Introduction

The City of Rockford is receiving \$2,171,919 in CDBG funds, \$982,552 in HOME funds, and \$184,641 in ESG funds for the FY 2020 program year. The program year goes from January 1, 2020 to December 31, 2020. These funds will be used to address the following priority needs: Housing; Homeless; Other Special Needs; Community Development; Economic Development; and Administration, Planning, and Management.

The accomplishments of these projects/activities will be reported in the FY 2020 Consolidated Annual Performance and Evaluation Report (CAPER).

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$2,171,919	\$8,000	\$0	<b>\$2,179,919</b>	\$8,679,676	8 Projects/activities were based on the FY 2020 CDBG allocations

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of Con Plan \$	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	\$982,552	\$5,400	\$0	<b>\$987,952</b>	\$3,924,808	5 Projects/activities were based on the FY 2020 HOME allocations
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$184,641	\$0	\$0	<b>\$184,641</b>	\$738,564	1 Projects/activities were based on the FY 2020 ESG allocations

Table 54 - 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****Leverage:**

Various departments of the City leverage entitlement and other public dollars with private, state and local resources. They include, but are not limited to, the following:

**Public:**

- United States Environmental Protection Agency
- Office of Administration for Children and Families – Community Services Block Grant
- Department of Energy – Weatherization Assistance Program

In addition, the City of Rockford is eligible to make application to HUD for five times the current CDBG entitlement for application of Section 108 Loan Guarantee funds. Section 108 can be used to fund economic development, housing, public facilities, infrastructure, and other physical development projects, including improvements to increase resilience against natural disasters.

**Private:**

- **Housing rehabilitation** – If the cost of rehabilitation exceeds the City's program maximums, property owners can invest their own savings, or seek loans from a financial institution. Homeownership is gap financing. Therefore, first mortgage financing is provided by mortgage lenders. Some homebuyers may qualify for additional homebuyer assistance through a Federal Home Loan Bank of Chicago housing program. In addition, most homebuyers are required to invest their own savings. In the past, the City has supplemented housing rehabilitation programs with Federal Home Loan Bank of Chicago (FHLBC) competitive grants. Traditionally competitive grant applications are accepted annually. Development assistance is gap financing. Therefore, developers may seek bridge loans and/or permanent financing from financial institutions, Community Development Financial Institutions, investors through Low Income Housing Tax Credit programs, deferred developer fee, donations, etc. Economic Development (ED) Some ED programs require beneficiaries to provide their own funds as leverage. This may be their own savings, or a loan from a financial institution, etc.

**State:**

The City will continue to seek competitive grant funding through the Illinois Housing Development Authority (IHDA) for housing and community development. Most recently, funds have been awarded to supplement the City's Demolition and Clearance programs. The City plans to apply for future funding as it becomes available.

In addition, IHDA has homeownership programs which provide first mortgage financing and downpayment assistance. These funds are provided to homebuyers through financial institutions approved by IHDA.

**Local:**

Some local programs include, but are not limited to, the following:

- The Winnebago County Health Department
- The Rockford Area Habitat for Humanity
- The Community Foundation of Northern Illinois
- Tax Increment Financing Districts

**HOME and ESG Match Requirements:**

The City's HOME match requirement of 25% has been met; having an excess amount of \$1,078,723 from previous years. The match requirement is generally met through housing developments. However, the City does report other match funds as they become available. For homeownership this might be volunteer labor on a Habitat home that was purchased using the City's homeownership program. For housing rehabilitation projects, this could include capital improvements completed in the area.

The City anticipates that it will have ESG match of \$180,781 from local and state funds. In addition to local and state funds, match consists of donations and grants to ESG sub-grantees.

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

In general, the City does not intend to acquire or improve land, property, or buildings with CDBG funds. However, the City reserves the right to utilize CDBG funds for such acquisitions, should there be an appropriate and vetted project.

**Discussion**

Not Applicable.

## 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.	HS-1 Housing Development	2020	2024	Affordable Housing	City Wide	Housing Strategy	HOME: \$256,778	Other: 2 Other
2.	HS-2 Housing Rehabilitation	2020	2024	Affordable Housing	City Wide	Housing Strategy	CDBG: \$690,000 HOME: \$550,884	Rental units rehabilitated: 0 Household Housing Unit Homeowner Housing Rehabilitated: 55 Household Housing Unit
3.	HS-3 Homeownership	2020	2024	Affordable Housing	City Wide	Housing Strategy	HOME: \$76,635	Direct Financial Assistance to Homebuyers: 5 Households Assisted
4.	HS-4 Fair Housing	2020	2024	Affordable Housing	City Wide	Housing Strategy	CDBG: \$10,000	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5.	HS-5 Project Delivery	2020	2024	Affordable Housing	City Wide	Housing Strategy	CDBG: \$402,348	Homeowner Housing Added: 1 Household Homeowner Housing Rehabilitated: 55 Household Housing Unit Direct Financial Assistance to Homebuyers: 5 Households Assisted Other: 2 Other
6.	HMS-1 Housing	2020	2024	Homeless	City Wide	Homeless Strategy	ESG: \$68,000	Other: 1 Other
7.	HMS-2 Operation/Support	2020	2024	Homeless	City Wide	Homeless Strategy	ESG: \$45,000	Other: 2 Other
8.	HMS-3 Prevention and Re-Housing	2020	2024	Homeless	City Wide	Homeless Strategy	ESG: \$57,978	Other: 1 Other
9.	CDS-6 Clearance/Demolition	2020	2024	Non-Housing Community Development	City Wide	Community Development Strategy	CDBG: \$413,541	Buildings Demolished: 35 Buildings
10.	EDS-1 Employment	2020	2024	Economic Development	City Wide	Economic Development Strategy	CDBG: \$195,571	Businesses assisted: 3 Businesses Assisted
11.	EDS-2 Development	2020	2024	Economic Development	City Wide	Economic Development Strategy	CDBG: \$83,198	Other: 2 Other
12.	AMS-1 Overall Coordination	2020	2024	Administration, Planning, and Management	City Wide	Administration, Planning, and Management Strategy	CDBG: \$377,261	Other: 3 Other

Table 55 – Goals Summary



**Goal Descriptions**

1.	Goal Name	HS-1 Housing Development
	Goal Description	Increase the number of affordable housing units in the City for owners and renters by assisting with acquisition, development fees, construction, and rehabilitation.
2.	Goal Name	HS-2 Housing Rehabilitation
	Goal Description	Continue to assist with rehabilitating existing affordable housing units occupied by owners and renters in the City by addressing code violations, emergency repairs, energy efficiency improvements, and handicap accessibility.
3.	Goal Name	HS-3 Homeownership
	Goal Description	Continue to assist low- and moderate-income homebuyers to purchase homes by providing direct subsidies which include but are not limited to down payment and closing cost assistance including housing counseling fees, interest subsidies, etc.
4.	Goal Name	HS-4 Fair Housing
	Goal Description	Promote fair housing choice through education, testing, training, and outreach in the City of Rockford.
5.	Goal Name	HS-5 Project Delivery
	Goal Description	Provide eligible program delivery and oversight for the CDBG and HOME funded housing projects/activities.
6.	Goal Name	HMS-1 Housing
	Goal Description	Support the Continuum of Care's efforts and applicants to provide emergency shelter, transitional housing, permanent supportive housing, and other permanent housing opportunities.
7.	Goal Name	HMS-2 Operation/Support
	Goal Description	Assist providers who operate housing or provide support services for the homeless and persons or families at-risk of becoming homeless.

8.	Goal Name	HMS-3 Prevention and Re-Housing
	Goal Description	Assist the Continuum of Care's efforts in prevention of homelessness through anti-eviction activities and program for rapid re-housing.
9.	Goal Name	CDS-6 Clearance/Demolition
	Goal Description	Remove and eliminate slum and blighting conditions through demolition of vacant, abandoned, and dilapidated structures.
10.	Goal Name	EDS-1 Employment
	Goal Description	Support and encourage job creation, job retention, and job training opportunities.
11.	Goal Name	EDS-2 Development
	Goal Description	Support business and commercial growth through rehabilitation of store fronts and retail space, expansion of businesses, and the development of new businesses.
12.	Goal Name	AMS-1 Overall Coordination
	Goal Description	Provide program management and oversight for the successful administration of Federal, State, and locally funded programs, including planning services for special studies, annual action plans, five year consolidated plans, substantial amendments, consolidated annual performance and evaluation reports (CAPER), environmental reviews and clearances, fair housing, and compliance with all Federal, State, and local laws and regulations.

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The City of Rockford proposes to undertake the following activities with the FY 2020 CDBG, HOME, and ESG, funds.

#### Projects

#	Project Name
1.	CDBG Administration
2.	Housing Services
3.	Rehab Services
4.	CDBG Housing Rehabilitation
5.	Fair Housing
6.	Clearance/Demolition
7.	Economic Development
8.	Section 108 Stand-by Loan Debt Service
9.	HOME Administration
10.	HOME Housing Rehabilitation
11.	Homeownership
12.	Housing Development
13.	CHDO Operating
14.	Emergency Solutions Grant

**Table 56 – Project Information**

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

There are many factors that guided the City when developing the budget. Besides taking into consideration feedback from all the City's outreach, the City considers the following:

- At least 70% of the City's CDBG entitlement over a 3-year period must benefit low/mod income

persons, a National Objective required by the CDBG regulations. This may occur through directly assisting low/mod income households and/or benefitting low/mod persons through an area benefit.

- By program design, all of the HOME and ESG program funds, except for allowable administration, planning, and/or CHDO operating costs, must benefit low income households. The City determines that beneficiaries are low income by documenting their income or, under certain circumstances, the City is allowed to presume beneficiaries are low income.
- Active local and regional plans, strategies, and initiatives; i.e. the 5-Year Plan, the 2020 Comprehensive Plan, the National Resource Network (NRN) Neighborhood Revitalization Strategy, etc.
- The capacity of staff and partners, ensuring the City's Grant Policy and Federal Regulations are followed.
- Level of need and other resources available to meet those needs.
- Ability to leverage other resources to provide the greatest return on investment.

The City's plans to meet the National Objective of low/mod income for the FY 2020 budget through the following:

- The City plans to ensure beneficiaries of CDBG funded housing programs meet the definition of low/mod income. This may be through documenting that beneficiaries assisted throughout the City have low/mod income, or when located in the NRS 51% of the beneficiaries have low/mod income, etc.
- Most Economic Development projects will either serve low/mod income areas by census tract or block group, be located in a census tract or block group with poverty level greater than 20% (or 30% if including Central Business District), create or retain employment of which 51% will be held by or made available to low-to-moderate income individuals, or assist a low-to-moderate income microenterprise development. When the City awards CDBG for Economic Development projects aligning with a redevelopment plan, the National Objective changes to Slums/Blight.

CDBG funded demolition and/or clearance activities prevent or eliminate slums and blight on a spot basis, and therefore, do not meet the National Objective of assisting low/mod income persons. In addition, Administration & Planning dollars, Fair Housing, Section 108, and CHDO Operating, cannot count toward the 70% low/mod requirement.

The City must designate the 6 Priority Needs; e.g. Housing, Homeless, Other Special Needs, Community Development, Economic Development, and Administration, Planning and Management, as High or Low Priority. If High priority, activities are expected to be funded during FY 2020. If Low Priority, activities may not be funded during FY 2020. All priorities are ranked High Priority, except for Other Special Needs, which is ranked Low Priority.

One of the biggest obstacles to addressing underserved needs is the age of Rockford's housing stock. 78% of the City's housing stock was built in 1979 or prior. The cost to rehabilitate homes to bring them up to

code is expensive, due to lead-based paint requirements and the cost of deferred maintenance. In addition, there is a potential for the homes to be considered historic. The materials needed to meet historic standards are usually more expensive and may need to be custom-ordered, which increases the construction time to complete the project. The rehabilitation projects will require lead licensed contractors, which are limited in quantity and in high demand for other housing programs in the region.

**AP-38 Project Summary****Project Summary Information**

1.	<b>Project Name</b>	<b>CDBG Administration</b>
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	AMS-1 Overall Coordination
	<b>Needs Addressed</b>	Administration, Planning, and Management Strategy
	<b>Funding</b>	CDBG: \$377,261
	<b>Description</b>	Provide program management and oversight for the successful administration of Federal, State, and locally funded programs, including planning services for special studies, annual action plans, five year consolidated plans, substantial amendments, consolidated annual performance and evaluation reports (CAPER), environmental reviews and clearances, fair housing, and compliance with all Federal, State, and local laws and regulations. No more than 20% of CDBG grant funds (plus allowable program income) may be used for planning and administration.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1 Other
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Administration of federal, state and locally funded programs, including all necessary compliance, planning, reviews, and reports.
2.	<b>Project Name</b>	<b>Housing Services</b>
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	HS-5 Project Delivery
	<b>Needs Addressed</b>	Housing Strategy
	<b>Funding</b>	CDBG: \$177,003

	<b>Description</b>	Funds may be used to pay costs in support of activities eligible for funding under the HOME program. This includes services such as housing counseling in connection with affordable housing projects, energy auditing, preparation of work specifications, loan processing, inspections, tenant selection, and other services related to assisting owners, tenants, contractors, and other entities participating or seeking to participate in the HOME program.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	28 Units 1 Other
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Project delivery to support HOME-funded housing rehabilitation (22 units), homeownership (5 units), affordable housing (1 unit) and CHDO Operating (1 other).
3.	<b>Project Name</b>	<b>Rehab Services</b>
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	HS-5 Project Delivery
	<b>Needs Addressed</b>	Housing Strategy
	<b>Funding</b>	CDBG: \$225,345
	<b>Description</b>	Funding will provide for housing administration and activity delivery costs for all CDBG assisted housing rehabilitation and housing rehabilitation carried out using other funding sources that meet all CDBG program requirement. This includes, but is not limited to direct and indirect costs integral to the delivery of the activities.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	33 Units and 1 Other
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Project delivery to support CDBG-funded housing rehabilitation (33 units).

4.	<b>Project Name</b>	<b>CDBG Housing Rehabilitation</b>
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	HS-2 Housing Rehabilitation
	<b>Needs Addressed</b>	Housing Strategy
	<b>Funding</b>	CDBG: \$690,000
	<b>Description</b>	Assists owners with rehabilitating existing affordable housing units occupied by owners and renters in the City by addressing code violations, emergency repairs, energy efficiency improvements, and handicap accessibility.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	33 Units
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Housing rehabilitation assistance for owners to address properties occupied by owners and renters (33 units).
5.	<b>Project Name</b>	<b>Fair Housing</b>
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	HS-4 Fair Housing
	<b>Needs Addressed</b>	Homeless Strategy
	<b>Funding</b>	CDBG: \$10,000
	<b>Description</b>	Promote fair housing choice through education, training, testing, and outreach in the City of Rockford.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1 Other
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Provide education, training, testing, and outreach regarding Fair Housing topics.



6.	<b>Project Name</b>	<b>Clearance/Demolition</b>
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	CDS-6 Clearance/Demolition
	<b>Needs Addressed</b>	Community Development Strategy
	<b>Funding</b>	CDBG: \$413,541
	<b>Description</b>	Funds will be used for the removal and elimination of slum and blighting conditions through clearance and demolition of vacant and blighted structures and improvements that are not suitable for rehabilitation.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	35 Structures
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Clearance, demolition, removal of vacant and blighted structures, and improvements for properties that are not suitable for rehabilitation (35 units).
7.	<b>Project Name</b>	<b>Economic Development</b>
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	EDS-1 Employment EDS-2 Development
	<b>Needs Addressed</b>	Economic Development Strategy
	<b>Funding</b>	CDBG: \$195,571
	<b>Description</b>	Funding may be used to improve and expand employment opportunities for low and moderate income persons. In addition, funds may support businesses and commercial growth through revitalization and development businesses and capital.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	3 Businesses

	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	ED projects will either serve low/moderate income areas by census tract or block group, be located in a census tract or block group with poverty level greater than 20% (or 30% if including Central Business District), create or retain employment of which 51% will be held by or made available to low-to-moderate income individuals, assist low-to-moderate income microenterprise development or align with a redevelopment plan. 3 Businesses will be assisted.
8.	<b>Project Name</b>	<b>Section 108 Stand-by Loan Debt Service</b>
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	EDS-2 Development
	<b>Needs Addressed</b>	Economic Development Strategy
	<b>Funding</b>	CDBG: \$83,198
	<b>Description</b>	Loan guarantee program that leverages CDBG allocation to support larger job-creating/retaining economic development projects through access to low interest capital.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1 Other
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	Loan guarantee program that leverages CDBG allocation to support larger job-creating/retaining economic development projects through access to low interest capital.
9.	<b>Project Name</b>	<b>HOME Administration</b>
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	AMS-1 Overall Coordination
	<b>Needs Addressed</b>	Administration, Planning, and Management Strategy
	<b>Funding</b>	HOME: \$98,255

	<b>Description</b>	Provide program management and oversight for the successful administration of Federal, State, and locally funded programs, including planning services for special studies, annual action plans, five year consolidated plans, substantial amendments, consolidated annual performance and evaluation reports (CAPER), environmental reviews and clearances, fair housing, and compliance with all Federal, State, and local laws and regulations. No more than 10% HOME funds (plus allowable program income) may be used for planning and administration.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1 Other
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Administration of HOME program, including and all necessary compliance, planning, reviews, and reports.
10.	<b>Project Name</b>	<b>HOME Housing Rehabilitation</b>
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	HS-2 Housing Rehabilitation
	<b>Needs Addressed</b>	Housing Strategy
	<b>Funding</b>	HOME: \$550,884
	<b>Description</b>	Assists owners with rehabilitating existing affordable housing units occupied by owners and renters in the City by addressing code violations, emergency repairs, energy efficiency improvements, and handicap accessibility.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	22 Units
	<b>Location Description</b>	Citywide

	<b>Planned Activities</b>	Housing rehabilitation assistance for owners to ensure properties occupied by owners and renters meet local code, including the removal of lead and other hazards. In addition, the funding can be used to make units accessible (22 units).
<b>11.</b>	<b>Project Name</b>	<b>Homeownership</b>
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	HS-3 Homeownership
	<b>Needs Addressed</b>	Housing Strategy
	<b>Funding</b>	HOME: \$76,635
	<b>Description</b>	Assist low income homebuyers to purchase homes by providing direct subsidies which include but are not limited to down payment and closing cost assistance, including housing counseling fees, interest subsidies, etc.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	5 Units
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Assist low income homebuyers to purchase homes by providing direct subsidies which include but are not limited to down payment and closing cost assistance, including housing counseling fees, interest subsidies, etc. (5 units).
<b>12.</b>	<b>Project Name</b>	<b>Housing Development</b>
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	HS-1 Housing Development
	<b>Needs Addressed</b>	Housing Strategy
	<b>Funding</b>	HOME: \$207,651
	<b>Description</b>	Increase the number of affordable housing units in the City for owners and renters by assisting with acquisition, development fees, construction, and rehabilitation.
	<b>Target Date</b>	12/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	1 Other
	Location Description	Citywide
	Planned Activities	Developers 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. Includes Community Housing Development Organization (CHDO) projects. 1 Developer will be assisted.
13.	Project Name	CHDO Operating
	Target Area	City Wide
	Goals Supported	HS-1 Housing Development
	Needs Addressed	Housing Strategy
	Funding	HOME: \$49,127
	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	12/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	1 Other
	Location Description	Citywide
	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. 1 CHDO will be assisted.
14.	Project Name	Emergency Solutions Grant
	Target Area	City Wide

	<b>Goals Supported</b>	HMS-1 Housing HMS-2 Operation/Support HMS-3 Prevention and Re-Housing AMS-1 Overall Coordination
	<b>Needs Addressed</b>	Homeless Strategy Administration, Planning, and Management Strategy
	<b>Funding</b>	ESG: \$184,641
	<b>Description</b>	ESG funds will be used for essential services, operating/rehab of emergency shelters, homeless prevention/rapid rehousing, HMIS, and administration.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	5 Others
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Essential Services = \$15,000 (1 – other) Operating/Rehab of Emergency Shelters = \$68,000 (1 – other) Homeless Prevention/Rapid Rehousing = \$57,978 (1 – other) HMIS = \$30,000 (1 – other) Administration = \$13,663 (1 - other)

## **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**

The following information provides a profile of the population, age, and racial/ethnic composition of the City of Rockford. This information was obtained from the U.S. Census Bureau American Factfinder website, <http://factfinder.census.gov>. The 2013-2017 American Community Survey 5-Year Estimates were used to analyze the social, economic, housing, and general demographic characteristics of the City of Rockford. The 5-year estimates are the most recent data available for the City.

#### **Population:**

The following illustrates the population trends for the City of Rockford:

- The total population for the City of Rockford at the time of the 2010 Census was 154,517. The American Community Survey Estimate for 2013-2017 estimate was 148,640. This illustrates a stable, yet slightly declining, population. The City's population decreased by about 3.8%, or an estimated 5,877 people.
- According to 2013-2017, there were an estimated 72,451 females (48.7%) and 76,189 males (51.3%) living in the City of Rockford.

#### **Age:**

The following illustrates the age of the population in the City of Rockford at the time of the 2013-2017 American Community Survey.

- Median age in the City of Rockford was 36.5 years, compared to 39.6 years in Winnebago County and 37.7 years for Illinois.
- Seniors age 65 or over make up 15.7% of the City's population. This is below the County's percentage of 16.1% of the population and higher than the State's of 14.4% of the population.

#### **Race/Ethnicity:**

Racial/ethnic composition of the City of Rockford from the 2013-2017 American Community Survey:

- 67.0% are White
- 21.6% are Black or African American
- 3.2% are Asian
- 18.4% are Hispanic or Latino/a

**Income Profile:**

The Median Family Household Income for a family of four is \$61,627 with a margin of error of \$1,120 in the Rockford Metro Area according to HUD's FY 2016 Income Limits. The following is a summary of income statistics for the City of Rockford:

- At the time of the 2013-2017 American Community Survey, median household income in the City of Rockford was \$41,991 which was lower than Winnebago County (\$47,198) and the State of Illinois (\$61,229)
- 33.2% of households with earnings received Social Security income.
- 4.3% of households with earnings received public assistance.
- 17.2% of households with earnings received retirement income.
- 46.3% of female-headed households were living in poverty.
- 32.2% of all youth under 18 years of age were living in poverty.

**Low/Mod Income Profile:**

The low- and moderate-income profile for City of Rockford is a measurement of the area's needs. City of Rockford has an overall low- and moderate-income percentage of 54.03%.

**Economic Profile:**

The following illustrates the economic profile for the City of Rockford as of the 2013-2017 American Community Survey:

- 28.1% of the employed civilian population had occupations classified as management, business, science, and arts.
- 22.6% of the employed civilian population had occupations classified as sales and office.
- 20.8% were in the service sector.
- 22.7% of the employed population was in the production, transportation, and material moving sector.
- 85.7% of workers were considered in private wage and salary workers class.
- 4.4% of workers were considered in the self-employed workers in own not incorporated business.

According to the U.S. Labor Department, the preliminary unemployment rate for the City of Rockford and Winnebago County in December 2020 was 5.8%, 3.7% for the State of Illinois, and a national unemployment rate of 3.5%.



## Geographic Distribution

Target Area	Percentage of Funds
City Wide	100%
CDBG Eligible Areas	0%

**Table 57 - Geographic Distribution**

## Rationale for the priorities for allocating investments geographically

The AP-38 Project Summary describes the “Location Description” as Citywide for all projects. With over 51% of the census tracts in Rockford being considered low/moderate income, it is anticipated that many investments will be made within low/moderate income census tracts. In addition, other City departments invest in these same low/moderate income census tracts.

As part of the 5-year Consolidated Plan, the City developed a Neighborhood Revitalization Strategy Area (NRSA). The NRSA allows the City to aggregate housing units within the area by demonstrating that 51% of the units rehabilitated are occupied by low/moderate income households. The NRSA provides flexibilities for qualifying Economic Development activities in the area as low/moderate. In addition, the public service cap is removed for public services carried out by a designated Community Based Development Organization (CBDO) in the area. Should HUD approve the NRSA, the City may strategically invest dollars, therefore, making a greater impact to the following Census Tract/Block Groups:

- CT 10/BG 2
- CT 11/BG 2
- CT 12/BG 1 & 2
- CT 13/BG 1 & 3
- CT 22/BG 3
- CT 27/BG 1, 2, & 3
- CT 28/BG 1 & 2

The National Resource Network (NRN), a consulting firm, developed the Rockford Neighborhood Revitalization Strategy as the City was developing the 5-year Consolidated Plan. The goal of the NRN strategy is to target blight and its negative impact on neighborhoods; reinforce positive perceptions; and develop robust outreach to foster community connection, engagement and improved quality of life. This strategy will help to determine some geographic priorities for community development and housing programs, depending upon the type of neighborhood (Strong, Middle, or Emerging), and the program type (i.e., homeownership, rehabilitation, economic development.)

For additional rationale for priorities, see AP-35 Projects.

## Discussion

Not Applicable.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The City of Rockford will utilize its CDBG, HOME, and ESG funds to rehabilitate homes, assist with home ownership, and homeless programs. The one year goals for HOME-funded affordable housing in the City of Rockford for FY 2020 are as follows:

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	28
Special-Needs	0
<b>Total:</b>	<b>28</b>

Table 58 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	1
Rehab of Existing Units	22
Acquisition of Existing Units	5
<b>Total:</b>	<b>28</b>

Table 59 - One Year Goals for Affordable Housing by Support Type

#### Discussion

In addition to the units indicated in Table 57 and 58, which are HOME funded activities, the City budgeted CDBG and ESG funds the following affordable housing projects:

- **CDBG-20-04 CDBG Housing Rehabilitation:** Housing rehabilitation assistance for owners to address properties occupied by owners and renters (33 Rehab of Existing Units).
- **ESG-20-14 Emergency Solutions Grant:** Through essential services, operating/rehab of emergency shelters, and homeless prevention/rapid rehousing, 572 homeless households will receive support, and 64 households will receive rental assistance.

## AP-60 Public Housing – 91.220(h)

### Introduction

Rockford Housing Authority serves the Rockford area by providing public housing for low-income city residents. The vision of the Rockford Housing Authority is “the RHA will re-establish itself as high performing agency that is a leader in housing and sustainable communities by developing additional, non-HUD revenue streams, increasing our asset base and offering state of the art resident initiatives.”

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

The Rockford Housing Authority’s (HACP) has outlined five (5) goals in addressing its needs as an agency:

#### Goal 1: Reduce Dependency on HUD Grant Funds

**Objective A:** Identify other sources of tax credit and grant funding including state and local dollars, and public and private foundation funds. *Diversify.*

**Objective B:** Create business opportunities including consulting and training activities

#### Goal 2: Bring in Sufficient Funds from Grants, Consulting, Training and/or Other Activities Each Year to Fully Support Operations – includes Fee for Service with RHA.

**Objective A:** Develop a full cost of operation

**Objective B:** Establish budget and funding targets annually

**Objective C:** Internally track and monitor the flow of funds

#### Goal 3: Streamline and Improve the Process of Identifying and Applying for Funds

**Objective A:** Create internal tracking and monitoring systems

**Objective B:** Develop boilerplate proposals for PHAs and non-HUD funders

#### Goal 4: Streamline and Improve the Process of Reporting Progress to Funders

**Objective A:** Automate case management information

**Objective B:** Automate the Logic Model for each HUD grant award

**Objective C:** Automate and track goals and objectives for all other awards

**Goal 5: Increase the Percentage of Bridge and RHA Residents That Are Served by RSD**

**Objective A:** Establish an RSD presence on-site, funds allowing

**Objective B:** Increase the number of successful partnerships with local service provider organizations, and encourage them to provide services in RHA communities

The Rockford Housing Authority's FY 2019 Capital Fund Program Budget is as follows:

- **Operations** = \$644,024.80
- **Management Improvement** = \$386,414.88
- **Administration** = \$322,012.40
- **Fees & Costs** = \$208,000.00
- **Site Improvement** = \$353,000.00
- **Dwelling Structures** = \$347,008.56
- **Dwelling Equipment** = \$120,000.00
- **Non-Dwelling Structures** = \$81,000.00
- **Non-Dwelling Equipment** = \$31,500.00
- **Relocation Costs** = \$10,000.00
- **Development Activity** = \$261,085.00
- **Collater Exp / Debt Srvc** = \$7,109.00
- **Contingency** = \$257,609.92
- **RAD-CFP** = \$77,741.00
- **Debt Reserves** = \$0.00
- **Loan Debt Obligation** = \$ 113,618.44
- **Total** = \$ 3,220,124.00

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

The Rockford Housing Authority (RHA) has several opportunities for resident involvement. They are as follows:

- **Housing Occupants Mobilization Effort (HOME):** HOME is an organization that has the responsibility of working with RHA and Resident Leadership Councils (RLCs) for the good of all. It is comprised of RHA residents elected from RLCs. The HOME Board addresses issues which affect the quality of life of public housing residents. The HOME/RAB is the governing agency of all RHA's RLCs. HOME/RAB Executive officers, in partnership with appropriate RHA staff, assist RLCs and residents at each site with the organization and functioning of the RLCs. RHA staff provides technical assistance to the HOME/RAB and RLCs to ensure compliance with HUD guidelines and

requirements.

- **Resident Leadership Councils (RLCs):** RLC's serve as tenant organizations for a development or a building of RHA-managed property. The principal purposes of the RLC are: Advocate for residents before RHA and other agencies, and act as a liaison between such agencies. Aid in the evaluation of physical and social conditions at respective developments or buildings. Encourage programs and activities designed to promote independence, self-sufficiency, community and quality of life. Encourage good working relationships between residents, HOME/RAB and RHA staff. Aid in determining the needs of each development or building. Provide a forum for sharing of information about RHA and its programs and offerings. Make reformations to the development of the RHA capital and annual plans. RHA Family Self-Sufficiency (FSS): RHA encourages residents to participate in FSS programming which breaks down into four (4) different paths. These are ReBuild, ReStart: Empowerment & Life Skills Building, Rethink: Educational Development & Networking, and Recreate: Special Programs and Initiatives. Each of these tracts offer unique programming to fit the needs of the resident. ReBuild helps Residents reach short and long term goals to become self-sufficient. Residents receive direct services assistance, service coordination, and case management. ReStart: Empowerment & Life Skills Building focuses on Personal Empowerment & Goals, Health & Wellness, Housekeeping & Independent Living, and Parenting & Early Learning. ReThink: Educational Development & Networking focuses on Financial Education & Planning, Employment & Education, Digital Literacy, Leadership Development, and Homeownership. Recreate: Special Programs and Initiatives has special programs and initiatives such as ConnectHome, New Mix & Craft Entrepreneurship, and Resident Leadership Council. Resident Opportunities for Self-Sufficiency (ROSS): The ROSS program works closely with individual work plans related to employment, education, and strategies to reduce and eliminate subsidy assistance. A team of ROSS Case Managers work closely with residents to develop work plans to meet individual goals and they connect residents with local agencies and services that provide additional supportive services and resources needed to achieve success.

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

The Rockford Housing Authority is not classified as "troubled" by HUD and is performing satisfactorily according to HUD guidelines and standards. Therefore, no assistance is needed to improve operations of this Public Housing Authority.

**Discussion**

Not applicable.

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

### **Introduction**

The City of Rockford is part of the Boone, DeKalb, Winnebago County Continuum of Care. The City supports the efforts of the Continuum of Care and encourages organizations to submit applications for ESG funding requests to the Rock River Homeless Coalition. The goals identified are as follows:

- **HMS - 1 Housing** – Support the Continuum of Care's efforts and applicants to provide emergency shelter, transitional housing, permanent supportive housing, and other permanent housing opportunities.
- **HMS - 2 Operation/Support** – Assist providers who operate housing or provide support services for the homeless and persons or families at-risk of becoming homeless.
- **HMS - 3 Prevention and Re-Housing** – Assist the Continuum of Care's efforts in prevention of homelessness through anti-eviction activities and program for rapid re-housing.

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

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

The Rock River Homeless Coalition includes a broad representation of relevant organizations and agencies as well as interested individuals charged with:

- community-wide planning and strategic use of resources to address homelessness;
- improving coordination and integration with mainstream resources and other programs targeted to people experiencing homelessness;
- promoting the quick re-housing of homeless individuals and families; and
- improving data collection and performance measurement to ensure program success.

The City of Rockford Department of Human Services Community Service Division has a street outreach team to identify homeless individuals and get them into emergency and eventually permanent shelter. Individuals' needs are assessed during street outreach to make referrals for services if an individual does not want shelter assistance.

The Rockford Rescue Mission, a member of the Continuum of Care, places a great emphasis on helping individuals who are victims of domestic violence and abuse. The City of Rockford also has worked with the Rockford Police Department to help identify the risks of domestic violence and

to keep victims in their homes while removing the perpetrator.

The City is also facing an increase in the amount of aging homeless as homes become more difficult and expensive to maintain. The City of Rockford Human Services Department offers short term monetary assistance in order to keep individuals and families in their homes.

The City of Rockford has reached “functional zero” for veteran and chronic homelessness and has goals to end family and youth homelessness.

### **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 Coalition is a member of Built for Zero, a national movement to end homelessness; Rockford has reached “functional zero” for veterans and those who are chronically homeless. This means the City has reached a target number (seven for veterans and three for chronic) and has been able to maintain that number for over 90 days. It also means service providers rapidly rehouse newly homeless veterans and new chronically homeless in less than 30 days.

The City of Rockford’s Department of Human Services Community Service Division offers three (3) housing assistance programs. These are: rapid rehousing, homeless prevention, and condemnation relocation.

The Community Service Division offers a Chance4Change/Homeless Single Point of Entry to help all literally homeless persons (on streets or in shelters) as well as homeless youth, veterans and survivors of domestic violence access housing services.

**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 City of Rockford Human Services Department is the designated public Community Action Agency for Winnebago and Boone Counties. Community Action Agencies exist to break the cycle of generational poverty and to mitigate the immediate effects of poverty on individuals, families and neighborhoods.

As a Community Action Agency, the Human Services Department provides services to individuals, families, and neighborhoods in Rockford as well as in greater Winnebago and Boone Counties. This is accomplished by addressing systemic, community and individual factors. Key strategies include provision of direct services, partnering, collaborations and advocacy. Services are administered under two Divisions with input from a Community Action Board and the Head Start Policy Council.

### **Discussion**

Not Applicable.



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

### **Introduction:**

The City of Rockford in its most recent Analysis of Impediments to Fair Housing Choice identifies that the City of Rockford's Zoning Code does not contain a definition for disabled or handicapped. The Zoning Code has been amended up through March 31, 2017. There are no other public policies that restrict fair housing.

The City of Rockford's Analysis of Impediments to Fair Housing Choice has identified the following impediments and strategies:

### **Impediment 1**

- A: Continue to promote Fair Housing awareness through the media, seminars, testing, and training to provide educational opportunities for all persons to learn more about their rights under the Fair Housing Act and Americans With Disabilities Act
- B: Continue to distribute literature and informational material concerning fair housing issues, an individual's housing rights, and landlord's responsibilities to affirmatively further fair housing
- C: Promote housing choice so residents with the same financial means may choose to live anywhere in the City

### **Impediment 2**

- A: Support and encourage both private developers and non-profit housing providers to develop and construct new affordable mixed and middle income rental housing that would be located throughout the City of Rockford
- B: Support and encourage the rehabilitation of existing housing units in the City to create decent, safe, and sound rental housing that is affordable to lower income households
- C: Continue to provide funding for Code Enforcement to identify buildings and units that need to be maintained and rehabilitated in accordance with local codes

### **Impediment 3**

- A: Support homebuyer education and training programs to improve homebuyer awareness and increase the opportunities for lower-income households to become homebuyers
- B: Support and provide funds for downpayment assistance to lower-income households to become homeowners
- C: Support and encourage plans from both private developers and non-profit housing providers to develop and construct new affordable housing that is for-sale
- D: Support and encourage the acquisition, rehabilitation and resale of existing housing units to

become decent, safe, and sound

- E: Partner with private and non-profit developers to Increase opportunities for “lease purchase” housing

#### **Impediment 4**

- A: Support home rehabilitation programs that financially assist seniors and people with disabilities to provide a safe and accessible home in order to continue to age in place
- B: Support and encourage the development of accessible housing units in the City
- C: Provide fair housing education and outreach to seniors and people with disabilities to address fear of reporting housing and code violations
- D: Enforce the ADA and Fair Housing requirements for landlords to make reasonable accommodations to their rental properties so they become accessible to tenants with disabilities

#### **Impediment 5**

- A: Continue to provide support, education, and technical assistance opportunities to minority, women owned and small businesses
- B: Support and enhance workforce development and skills training that result in a livable wage and increases job opportunities
- C: Continue to promote and encourage economic development with local commercial and industrial firms to expand their operations and increase employment opportunities
- D: Support and encourage efforts for improvements in public transportation options in the City to allow for second and third shift workers
- E: Support and encourage private and non-profit developers and businesses to provide assets (grocery stores, services, etc.) in low to moderate income neighborhoods

**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 in its most recent Analysis of Impediments to Fair Housing Choice identifies that the City of Rockford’s Zoning Code does not contain a definition for “disabled” or handicapped”. The Zoning Code has been amended up through March 31, 2017. There are no other public policies that restrict fair housing.

There are no known public policies in the City of Rockford that are a barrier to affordable housing. The

City's Department of Community and Economic Development monitors the following:

- Construction and Development Services
- Neighborhood Standards
- Neighborhood Development
- Economic Development
- Long Range Planning

Fair housing is essential to ensuring that persons of all income levels, race, religion and ethnicity have equal access to safe, decent, sound, and affordable housing in the City of Rockford. The City of Rockford completed its Analysis of Impediments to Fair Housing Choice and is submitting as part of the Five-Year Consolidated Plan.

**Discussion:**

During the FY 2020 Program year the City will undertake the following fair housing activities:

- Host educational seminars with Realtors, banks and lenders, etc. to inform residents of their rights to fair housing.
- Pass a resolution recognizing the impact and importance of the Fair Housing Act of 1968.
- Make available to resident's informational brochures and other resources on fair housing rights.
- Support the efforts of the newly formed community relations commission.
- Support the efforts of fair housing groups and organizations.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

The City of Rockford has developed the following actions which addresses obstacles to meeting underserved needs, fosters affordable housing, reduces lead-based hazards, reduces the number of poverty-level families, develops institutional structures, and enhances coordination between public and private housing and social service agencies.

### **Actions planned to address obstacles to meeting underserved needs**

The City under its FY 2020 Program Year will take the following actions to address obstacles to meeting the underserved needs:

- Continue to provide funds for housing for owner occupied and renter occupied units.
- Continue to provide funds for new housing construction of owner occupied and renter occupied housing units that are decent, safe, sound, affordable, and accessible.
- Continue to work on the foreclosed and abandoned housing issues to help strengthen the City's vitality.
- Continue to work on the removal of architectural barriers in the City's older housing stock through rehabilitation.
- Continue to fund rehabilitation programs to help bring owner occupied housing stock up to code standards and to help seniors age in place.
- Continue to fund projects that assist business, employment training, and career counseling.
- Continue to leverage resources for minority and women owned businesses.
- The City will continue to leverage its financial resources and apply for additional public and private funds.

### **Actions planned to foster and maintain affordable housing**

The City of Rockford will coordinate with internal structures, non-profit and private developers, and community partners to increase the amount of affordable housing available in the City through new construction and rehabilitation projects as well as homeownership programs for eligible applicants. The City uses HOME funding for Community Housing Development Organizations (CHDO) as well as ESG funding to provide rental assistance for homeless households. Actions to maintain affordable housing will coordinate with anti-poverty measures such as job training, creation, and retention activities.

The City of Rockford will undertake the following projects to maintain affordable housing:

- **CDBG Housing Rehabilitation** - Funding will increase the number of decent, safe, and sanitary

single family housing (1-4 units) which will be occupied by low income beneficiaries (homeowner with or without special needs). (33 households)

- **HOME Housing Rehabilitation** - Funding will increase the number of decent, safe, and sanitary single family housing (1-4 units) which will be occupied by low income beneficiaries (homeowner with or without special needs). (22 households)
- **Homeownership** - Direct homebuyer assistance is available to low-income households purchasing single family (1-4) units. (5 households)
- **CHDO Affordable Housing** - Funding will increase the number of decent, safe, and sanitary housing units (single or multi-family) which will be occupied by low income beneficiaries (homebuyer or tenants with or without special needs). This includes but is not limited to, acquisition, rehabilitation, new construction, and accessibility modifications. (1 Other)
- **Emergency Solutions Grant** - ESG funds will be used for essential services, operating/rehab of emergency shelters, homeless prevention/rapid rehousing, HMIS, and administration. (5 Others)

### **Actions planned to reduce lead-based paint hazards**

The City is working to reduce potential lead-based paint hazards. Below are the City's activities to reduce lead-based paint hazards related to rehabilitation and homeownership programs.

#### **Rehabilitation Programs:**

While complying with Title 24 Part 35, the City of Rockford will ensure that:

- Applicants for rehabilitation funding receive the required lead-based paint information, including notices, and understand their responsibilities.
- Properly certified people perform risk assessment, paint testing, lead hazard reduction, and post project lead clearances.
- Required lead hazard reduction work and protective measures are incorporated into project rehabilitation specifications.

#### **Homeownership Programs:**

While complying with Title 24 Part 35, the City of Rockford will ensure that:

- Applicants for homeownership assistance receive the required lead-based paint information, including notices, and understand their responsibilities.
- Proper visual assessments are performed to identify deteriorated paint in the dwelling unit, and common areas servicing the unit, and exterior surfaces of the building.
- Prior to occupancy, properly qualified persons perform paint stabilization and the dwelling passes

a clearance exam.

Lead reduction involves the implementation of a lead-based paint treatments which will be carried out in conjunction with the City of Rockford's CDBG and HOME funded housing activities. The City partners with, and supports, the Winnebago County Health Department, who administers a "Creating Lead Safe Rockford" (CLSR) program. This program is funded by the U.S. Department of Housing and Urban Development (HUD) to mitigate lead hazards for low/moderate income owner-occupied or rental homes in the region. The City recognizes the importance of addressing lead-based paint hazards and will continue to support partners with and/or apply for additional resources to support these efforts.

### **Actions planned to reduce the number of poverty-level families**

Approximately 22.2% of the City of Rockford's residents live in poverty, while only 15.3% of Winnebago County residents live in poverty and 13.5% of the State of Illinois residents live in poverty. Female-headed households with children are particularly affected by poverty at 54.6%.

The City's anti-poverty strategy is based on supporting workforce development including job-training services for low to moderate income residents. In addition, the City's strategy is to provide supportive services for target income residents.

The City plans to use its CDBG funds to fund the following types of economic development and anti-poverty programs including:

- Assist in job creation and retention
- Small businesses assistance, which could include workforce training or support services for new employees
- Promote minority and women owned businesses
- Revitalization efforts
- Commercial/industrial infrastructure development and redevelopment

The City will also provide support of shelters and rapid rehousing/homelessness prevention through the use of ESG funds.

### **Actions planned to develop institutional structure**

To effectively implement the Five-Year Consolidated Plan, the City needs to collaborate with a variety of agencies located in the City of Rockford and in Winnebago County. Coordination and collaboration between agencies is important to ensuring that the priorities identified in the Five-Year Consolidated Plan within the City are adequately addressed. The key agencies that are involved in the implementation of the Five Year Consolidated Plan and FY 2020 Annual Action Plan, as well as additional resources that may be

available are described below.

**Public Institutions –**

- The City continues to partner with the Winnebago County Health Department's Lead Safe Program on housing projects to leverage available resources.
- The Northern Illinois Land Bank was established in 2019 and will be a resource for addressing vacant and blighted properties, as well as providing more efficient and effective procedures for returning properties to beneficial use.
- In 2019, the City hired a new staff person to act as a liaison with neighborhood groups, associations, and residents. The Neighborhood Specialist facilitates networks of neighborhood associations, builds capacity of organizations and community leaders, and helps to strategize neighborhood level plans that align efforts with City programs.
- The City's Neighborhood Revitalization Strategy will be used to determine geographic priorities for community development and housing programs, depending upon the type of neighborhood (Strong, Middle, or Emerging), and the program type (i.e., homeownership, rehabilitation, economic development.)

**Non-Profit Organizations –**

- The City certifies CHDOs at the time of application for a development providing affordable housing units and each year during the term of their loan.
- The City collaborates with other housing partner agencies to not only leverage funds but also support partner housing and community development projects.

**Private Industry –**

- The private sector is an important collaborator in the services and programs associated with the Five-Year Consolidated Plan and Annual Action Plan. The private sector brings additional resources and expertise that can be used to supplement existing services or fill gaps in the system. Several lending institutions provide first-time mortgage financing and financing for rehabilitation. Lenders, affordable housing developers, business and economic development organizations, and private service providers offer a variety of assistance to residents such as health care, small business assistance, home loan programs, and assisted housing, etc.

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

The City is committed to continuing its participation and coordination with public and private housing and social service agencies. The City has made available on their website under Neighborhood Development a list of resources for Fair Housing, Homebuyer Assistance programs, Move to Own programs etc. Under

the Human Services section of the website, the City offers information on financial assistance programs, homelessness prevention, Community Health, and information on the Continuum of Care and grant funding.

**Discussion:**

Not applicable.



## Program Specific Requirements

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

#### Introduction:

The City of Rockford receives an annual allocation of CDBG, HOME, and ESG funds. Since the City receives these federal allocations, the questions below have been completed, as they are applicable.

#### 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	\$0.00
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.	\$0.00
3. The amount of surplus funds from urban renewal settlements	\$0.00
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	\$0.00
5. The amount of income from float-funded activities	\$0.00
<b>Total Program Income:</b>	<b>\$0.00</b>

#### 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:**

The City of Rockford does not intend to use any other forms of investment other those described in 24 CFR 92.205(b). 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:**

The City of Rockford's Resale/Recapture guidelines are attached in the Grantee Unique Appendices.

- 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:**

In addition to the guidelines described in question #2 above for Recapture, the City may allow a subsequent buyer to assume the HOME assistance (subject to the HOME requirements for the remaining term of affordability) if the subsequent buyer is low-income, and no additional HOME assistance is provided. To preserve affordability, the City may use HOME funds to acquire units through a purchase option, right of first refusal or other preemptive right to purchase the housing before foreclosure, or at the foreclosure sale. (HOME funds may be used to cover the foreclosure costs to acquire housing with a HOME loan in default, but not to repay a loan made with HOME funds.) The affordability restrictions shall be revived according to the original terms if, during the original affordability period, the owner of record before the termination event, obtains an ownership interest in the housing. Also, to preserve affordability the City may use HOME funds to rehabilitate a unit, cover any costs associated with owning/holding the unit, and/or provide assistance to subsequent buyer. When this occurs, the additional investment is treated as an amendment to the original project unless the City choses to treat the expense as an administration cost. As a project cost, the original and the additional HOME funds will not exceed the maximum per unit subsidy amount under 24 CFR 92.250. Any administrative funds that are used may be reimbursed, in whole or in part, when the housing is sold to a new eligible homebuyer.

- 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:**

In general, the City does not intend to use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds. In addition, the funds will not be used to refinance multifamily loans made or insured by any federal program. The City is aware that

HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG. The City reserves the right to consider such action and will ensure that guidelines are developed and implemented.

**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. In January 2020, City Council approved the "City of Rockford Grant Policy" which will be followed by all City of Rockford employees when managing City grants. Additional procedures will be developed in 2020, including the management of sub-recipients.

**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. In January 2020, City Council approved the "City of Rockford Grant Policy" which will be followed by all City of Rockford employees when managing City grants. Additional procedures will be developed in 2020, including the management of sub-recipients.

**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. In January 2020, City Council approved the "City of Rockford Grant Policy" which will be followed by all City of Rockford employees when managing City grants. Additional procedures will be developed in 2020, including the management of sub-recipients.

**Discussion:**

Not applicable.

## Appendix - Alternate/Local Data Sources

1.	<b>Data Source Name</b>
	2011-2015 ACS Data
	<b>List the name of the organization or individual who originated the data set.</b>
	US Census
	<b>Provide a brief summary of the data set.</b>
	2011-2015 ACS Data Set
	<b>What was the purpose for developing this data set?</b>
	Census Data
<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b>	
Citywide	
<b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b>	
2011-2015	
<b>What is the status of the data set (complete, in progress, or planned)?</b>	
2011-2015 ACS five year estimate	



## **RESALE/RECAPTURE POLICY**

## City of Rockford Resale/Recapture Policy

***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:***

The City intends to provide HOME funds to low income homebuyers planning to occupy units as their primary residence. The homebuyer programs will follow the recapture guidelines. However, the City will follow the Resale guidelines if City provides *developer subsidy* and does not provide *direct HOME subsidy*, as defined below. The City will enforce deed restrictions, homebuyer agreements, and/or covenants recorded at the Winnebago County Recorder's Office. The City ensures compliance with the residency requirement as mortgagee on the homeowner's insurance policy – receiving notice upon ownership changes. Homebuyers found non-compliant for occupying the unit as their primary residence will repay the entire HOME investment (developer subsidy plus direct HOME subsidy) to the Department of Housing and Urban Development.

**Definitions:** The definition of *italicized* words throughout the document are below.

***Developer subsidy*** - The difference between the cost of producing the affordable unit and the fair market value of the unit.

***Direct HOME subsidy*** - The amount of HOME funds that enabled the *low-income* homebuyer to purchase a unit. This includes down payment, closing costs, interest subsidies, HOME funds provided directly to the homebuyer, and/or HOME funds that reduced the purchase price from fair market value to an affordable price. When developing a unit using HOME funds, if a unit sells below fair market value, the difference between the fair market value and the purchase price is also *direct HOME subsidy*.

***Fair return*** - The City calculates a fair return by multiplying the percentage change in the Consumer Price Index (CPI) over the period of ownership by the amount of the homebuyer's initial investment plus any homebuyer capital improvements since time of purchase.

Step 1

$A - B = C$
-------------

A = CPI % at time of sale to subsequent homebuyer  
B = CPI % at time of initial purchase  
C = % CPI change

Step 2

$(A + B) \times C = D$
------------------------

A = Homebuyer Initial Investment  
B = Homebuyer Capital Improvements  
C = % CPI change  
D = Fair Return

***Homebuyer capital improvements*** – This includes the amount originally spent for improvements to the unit that add value or substantially prolongs the life of the unit. Examples may include, but are not limited to, room additions, roof and/or window replacement, electrical and/or plumbing upgrades, accessibility modifications, bathroom and/or kitchen remodel, and outdoor improvements such as a new drive way, side walk, retaining wall or fence. Examples do not include replacing worn or dated components such as appliances or carpet. Homebuyers must provide proof of amount originally spent; i.e. paid receipts/invoices.



## **City of Rockford Resale/Recapture Policy**

**Homebuyer initial investment** – This includes any homebuyer contributions at time of initial purchase. Examples may include but are not limited to, down payment, closing costs, and earnest money.

**Low-Income** – 80% of the area median income as determined annually by the Department of Housing and Urban Development.

**Net proceeds** – are the sales price minus *superior loan* repayment (other than HOME funds) and any closing costs.

**Period of affordability** – is the length of time a *low-income* homebuyer must occupy the unit as their primary residence.

Period of Affordability	
Total HOME funds provided to the homebuyer	Minimum Period of Affordability
Under \$15,000	5 years
Between \$15,000 and \$40,000	10 years
Over \$40,000	15 years

Affordability restrictions (recapture or resale) will be revived according to the original terms if, during the original period of affordability, the initial homebuyer has a terminating event and regains ownership interest in the unit.

**Superior loan** – The recording of the initial mortgage loans at the time of purchase will be in the order in which repayment is required should a transfer of ownership occur voluntarily or involuntarily. All mortgages recorded in front of the HOME funds are superior loans.

### **Recapture Guidelines:**

For recapture, the total *direct HOME subsidy* determines the length of time the *period of affordability* lasts. Since the *direct HOME subsidy* is subject to recapture throughout the *period of affordability*, the homebuyer will sign an assistance agreement, a promissory note, and a mortgage. Recorded at the Winnebago County Recorder's office is the assistance agreement and mortgage.

If transfer of ownership occurs to any willing homebuyer during the *period of affordability* either voluntarily or involuntarily, the initial homebuyer is required to repay the remaining principal loan balance after a pro rata reduction over time calculation. However, the City will never recapture more than the available *net proceeds*. When the *net proceeds* are zero, there is no recapture of *direct HOME subsidy*.

Homebuyers found non-compliant of the recapture requirements will repay the entire HOME investment (developer subsidy plus direct HOME subsidy) to the Department of Housing and Urban Development.

### **Subsequent Homebuyer:**

The City may allow a subsequent *low-income* homebuyer assume the HOME requirements if no additional HOME funds are provided.

# **City of Rockford Resale/Recapture Policy**

## **Lease Purchase:**

Under a lease purchase agreement, if the unit fails to transfer to the homebuyer within forty-two months after project completion, the City will ensure the HOME affordability requirements for rental housing apply.

## **Preserving Affordability:**

If necessary to preserve the affordability of the unit, the City may use additional HOME funds to acquire through a purchase option, right of first refusal, or other preemptive right before foreclosure, or to acquire the housing at the foreclosure sale, to undertake any necessary rehabilitation, and to assist a subsequent homebuyer. When this occurs, unless the City chooses to treat the expense as an administration cost, the original HOME funds and the additional HOME funds will not exceed the maximum per unit subsidy amount under 24 CFR Part 92.250. Considered will be the reimbursement of administrative funds used, in whole or in part, when the housing sells to the subsequent homebuyer.

## **Resale Guidelines:**

For resale, the total amount of HOME funds invested in the unit (*developer subsidy plus direct HOME subsidy*) determines the length of time the *period of affordability* lasts. The homebuyer will sign a resale covenant, a promissory note, and a mortgage. Recorded at the Winnebago County Recorder's Office are the covenant and the mortgage.

When transfer of ownership to a qualifying subsequent homebuyer occurs, voluntary or involuntary during the *period of affordability*, the initial homebuyer may receive, when *net proceeds* allow, the sum of their *initial investment, capital improvements, and fair return*. The City will not receive more than the total HOME investment. Therefore, when appreciation of the unit exceeds the amount of HOME funds invested, the City will only collect an amount equal to the HOME investment.

Besides allowing the initial homebuyer to receive a fair return on their investment, the City must ensure the unit is affordable to a reasonable range of *low-income* homebuyers interested in fulfilling the resale requirements for the remaining *period of affordability*. Affordable to a reasonable range of *low-income* homebuyers is defined as homebuyers with household income between sixty percent (60%) and eighty percent (80%) of the area median income paying between twenty-five percent (25%) and thirty percent (30%) of their gross monthly income for principal, interest, property taxes, and insurance. Exceptions to the 25%-30% range maybe made when 1) homebuyers use State or Federal funded first mortgage lending products or 2) when the result significantly reduces the homebuyer's cost burden. The current fair market value will determine the sale price and not what is affordable to the subsequent homebuyer. To ensure affordability for the subsequent *low-income* homebuyer, the City may provide additional HOME funds.

Homebuyers found non-compliant of the resale requirements will repay the entire HOME investment (*developer subsidy plus direct HOME subsidy*) to the Department of Housing and Urban Development.



## **CITIZEN PARTICIPATION PLAN**



## **CITIZEN PARTICIPATION PLAN**

**CITY OF ROCKFORD  
DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT**

Effective April 2020

**CITY OF ROCKFORD**  
**COMMUNITY PLANNING AND DEVELOPMENT PROGRAMS**  
**CITIZEN PARTICIPATION PLAN**

**Overview**

The City of Rockford (City) is an entitlement community under the U.S. Department of Housing and Urban Development (HUD) Community Planning and Development (CPD) Programs. The CPD Programs awarded to the City are Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grants (ESG).

The administration of all (CPD) Programs is a function of the Community and Economic Development Department (CEDD) granted through a policy directive from the City of Rockford City Council. Even though the elected City officials have unrestricted responsibility and authority for these CPD Programs, the City recognizes Rockford citizen involvement in the decision making process is of greater benefit to all parties in the development and implementation of each program's goals and objectives.

In order to provide Rockford citizens with opportunities to participate in an advisory role in planning, implementing, and assessing the CPD Programs, the City will provide adequate information to the citizens of Rockford; hold public hearings to obtain views, and provide an opportunity to comment on the City's performance. The Citizen Participation Plan was developed as a mechanism to address those concerns.

**Purpose**

The purpose of the Citizen Participation Plan (Plan) is to identify the process, procedures, and policies to be followed by the City regarding the involvement of the citizens of Rockford in its CPD Programs. While the Plan is designed to meet the federal regulations associated with each, it has been expanded beyond those requirements to further enhance the participation of the citizens of Rockford. Nothing in the Plan, however, shall be construed to restrict the responsibility and authority of the City officials for the development of the application and the execution of its CPD Programs.

This plan outlines the means by which Rockford citizens can actively participate in the CPD planning process, which includes but is not limited to the development of the plans, substantial amendments to the plans, and any performance reports. In all instances, citizen participation will be conducted in an open manner, with freedom of access for all interested persons. Citizens of Rockford will be provided adequate and timely information that enables them to be meaningfully involved in the planning process.

**Participation**

All residents, particularly low-income residents who are the primary clients for the CPD Programs, public housing, and tenant-based assistance, and all protected classes are encouraged to submit comments, views, and proposals regarding the City's CPD Programs. Protected classes, according to the federal Fair Housing Act, along with the Civil Rights Act of 1968 are as follows: race, color, national origin, religion, sex, disability, and familial status. Familial status refers to households with children, households seeking custody of children, or women who are pregnant. Additional protected classes according to Illinois fair housing law include ancestry, age, military or military discharge status, marital status, protective order status, and sexual orientation.

The City also encourages local and regional public agencies, business, developers, community and faith based organizations, and other interested parties to participate.

All comments resulting from a publication and/or the public hearing(s) will be considered by the City prior to final submission of any plan or report.

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**COMMUNITY PLANNING AND DEVELOPMENT PROGRAMS**  
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CEDD is required to provide for technical assistance to groups representative of lower income residents that request such assistance in developing proposals for funding assistance under the consolidated plan.

CEDD staff is available for questions and comments regarding CPD documents and may be reached by telephone at 779-348-7162 or in person at City of Rockford City Hall, 425 E State St, 2nd Floor - Community & Economic Development Department.

**Access to Information**

Residents, public agencies, and other interested parties, including those most affected will have the opportunity to receive information, review, and submit comments on any proposed submission concerning the CPD programs. This includes but is not limited to budget; i.e., funding amounts and activities to be undertaken. The City must follow the Uniform Relocation Act of 1970, and therefore, intends to minimize displacement of persons and to assist any persons displaced when developing and carrying out budgets and plans.

The City intends to ensure all adopted documents are accessible to all. Therefore, they will be available via the City's website at [www.Rockfordil.gov](http://www.Rockfordil.gov). Upon request, the CEDD will make reasonable accommodations for residents unable to view via website.

CEDD shall maintain records to demonstrate compliance with the Citizen Participation Plan. The availability of these records and information shall be consistent with applicable State and local laws regarding personal privacy and obligations of confidentiality.

**Amendments**

*Standard Amendment:*

The City shall amend its approved plan as specified in CDBG regulations [Title 24 of the Code of Federal Regulations, Part 91.505(a)]. Therefore, amendments will be made whenever the City makes one of the following decisions:

1. A change in its allocation priorities or a change in the method of distribution of funds;
2. To carry out an activity, using funds from any program covered by the consolidated plan (including program income, reimbursements, repayment, recaptures, or reallocations from HUD), not previously described in the action plan; or
3. A change in the purpose, scope, location, or beneficiaries of an activity.

The amendments listed above are considered "standard" and do not require in-depth citizen participation.

*Substantial Amendment:*

A "Substantial Amendment" is one that requires Citizen Participation as defined herein. Criterion for substantial amendments are as follows:

1. Proposed activities not previously described in the plan.
2. Increases or decreases in grant dollars or activity dollars that cumulatively totals thirty (30) percent of that program year's grant allocation (i.e., the Annual Action Plan).

*Amendments using National Objective of Urgent Need:*

It may be necessary to amend the consolidated plan in the event of an emergency such as a natural disaster. These amendments may include funding new activities and/or the reprogramming of funds including canceling activities to meet community development needs that have a particular urgency. A substantial amendment does not include amendments to meet this National Objective of Urgent Need.

**CITY OF ROCKFORD**  
**COMMUNITY PLANNING AND DEVELOPMENT PROGRAMS**  
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Therefore, the CEDD may utilize CDBG or HOME funds to meet an urgent need without the normal public comment period, which is otherwise required for substantial amendments.

To comply with the national objective of meeting community development needs having a particular urgency, an activity will alleviate existing conditions that the City of Rockford certifies:

- Pose a serious and immediate threat to the health and welfare of the community
- Are of recent origin or recently became urgent
- The City is unable to finance the activity on its own
- Other resources of funding are not available to carry out the activity

A condition will generally be considered to be of recent origin if it is developed or became critical within 18 months preceding the City's certification.

Major Disaster Declaration Substantial Amendments (Abbreviated Plan):

If a local, state, or federal major disaster declaration is made and the City plans to use CPD funds to address community needs directly related to the disaster, the City will determine if a substantial amendment is required using the definition above. If a substantial amendment is deemed necessary, the City will use an abbreviated Plan which includes the following:

1. Under "Publishing & Notices" below, the City will provide marketing communications, as available, at least 3 days in advance of the Public Hearing and the public comment period will be a minimum of 5 days.
2. The City reserves the right to conduct virtual public hearings, as appropriate, to ensure the health and safety of community residents. All efforts will be made to provide timely response to citizen questions and provide public access to questions and responses.

**Publishing & Notices**

A notice of availability of the proposed document for public review and comment will be published in the local newspaper(s) prior to the submittal to HUD. This notice will provide the following:

- A short summary of the document
- Details of the comment period (30 days for plans and substantial amendments, 15 days for performance reports)
- List of locations of where copies of the entire plan or report may be examined and
- List of public hearing dates and locations

The City will provide electronic and written marketing communications at least two weeks in advance of a Public Hearing.

**Public Hearings**

A minimum of two public hearings will be held throughout the program year. The hearings will be conducted at a minimum of two different stages of the year. Together, they will address housing and community development needs, development of proposed activities, review of program performance, and announce if the City plans to access pre-award costs as allowed by the Uniform Administrative Requirements, Cost Principles and Audit Requirements regulation, at 2 CFR Part 200. At least one of the hearings will be held before the proposed document is published for comment.

CEDD will try to hold public hearings at times and locations convenient to residents who may benefit from the CPD programs. Locations will be accessible for residents with disabilities. In addition, CEDD

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intends to comply with the intent and spirit of the Americans with Disabilities Act. If a sign language interpreter, personal P.A. system or other special accommodations are needed, CEDD, will be prepared to assist if notified 48 hours in advance. Additionally, CEDD will provide interpreters when it is evident that a significant number of non-English speaking persons will be present.

Although not required, a third public hearing may be conducted to receive feedback regarding performance reports and/or special projects.

**Grievance, Complaints and Objections**

Any person or group feeling aggrieved in connection with the equal opportunity requirements of the Housing & Community Development Act of 1974 as amended with respect to any portion of the local Community Development Program or any of its project activities shall present those grievances in written form to the Director of the City of Rockford's Department of Community and Economic Development. The director will make every effort to provide a written decision on the grievance within 15 working days of a written complaint. If the aggrieved person feels the decision by the director is not acceptable, they may submit the written complaint to the Mayor of the City of Rockford. The Mayor will attempt to respond in writing within 15 days of receipt of the written complaint.

If the person submitting the grievance continues to feel unsatisfied, the Department will assist them in pursuing to submit and have their grievance heard by the Department of Housing and Urban Development. The area office, the regional office, and finally the central office will be exhausted in that order. The decision of the central office of the Department of Housing and Urban Development will be final.

A record of each grievance received by the Department's director will be maintained. Included within the record will be:

- 1) Name of person or persons alleging grievance.
- 2) Date of receipt.
- 3) Nature of the grievance.
- 4) Action taken by the Department.
- 5) Action taken by the local governing body.
- 6) Final disposition of the grievance.



**Substantial Amendment  
City of Rockford 2020-2024 Consolidated Plan  
2022 Annual Action Plan**

As part of the NSP1 grant closeout, the City of Rockford (City) plans to transfer Neighborhood Stabilization Program (NSP1) Program Income (PI) of \$62,056.92 and any future PI, to the City's Community Development Block Grant (CDBG) Program. This PI will fund CDBG Goals/Projects as described in the 2020-2024 Consolidated Plan and the 2022 Annual Action Plan. In addition, to meet the 10-year disposition requirement, the City has prepared a plan to dispose of all properties acquired due to a NSP1 activity.

**Program Income:**

In 2009, the Department of Housing and Urban Development (HUD) approved the City's 2008 program year Substantial Amendment for an award of NSP1. Planned uses included administration, demolition, housing developments for beneficiaries (homebuyers and tenants) with household incomes up to 120% of the Area Median Income, and land bank activities, within specified census tracts. The Amendment did not define planned uses of program income, except for administration limitations.

Later HUD published a Program Income Notice permitting grantees under NSP who are also grantees under the Community Development Block Grant (CDBG) Program to transfer program income (PI). The NSP1 PI becomes CDBG PI during the year that the transfer takes place. Pending HUD's approval, the PI transfer will take place this year. Therefore, eligible uses for CDBG PI includes Goals/Projects as described in the 2022 Annual Action Plan, approved by City Council on 1/10/22 as 2022-2-O. The Goals/Projects were as follows: housing development, housing rehabilitation, homeownership, fair housing, project delivery, clearance/demolition, infrastructure, and economic development activities.

**Disposition of City owned properties:**

As part of the NSP1 Substantial Amendment Activity #7 was NSP Land Bank, an informal land bank, which allowed the City to manage and dispose of vacant, homes/lots. According to the Substantial Amendment, the end use had to be a residential development with continued affordability for owners and/or tenants with household incomes up to 120% of the Area Median Income-AMI. However, according to the regulations, additional methods of disposition are eligible. Therefore, the City plans to dispose of four (4) City owned properties through eligible activities as described in CDBG 24 CFR Part 570.201(b), which states the following: *Disposition, through sale, lease, donation, or otherwise, of any real property acquired with CDBG funds or its retention for public purposes, including reasonable costs of temporarily managing such property or property acquired under urban renewal, provided that the proceeds from any such disposition shall be program income subject to the requirements set forth in § 570.504.*

**Amendment #2 (Substantial)**  
**Neighborhood Stabilization Program (NSP1) Close out required amendments**  
**Citizen Participation**

A Public Notice was published in the Rockford Register Star on April 24, 2022. In addition to this publication, information was provided through social media, and emails were sent using the City's Community and Economic Development Department (CEDD) internal contact list for housing, economic development, and community development organizations. This list includes, but is not limited to, economic development, fair housing, homeless and housing agencies, and neighborhood organizations.

The required 30 day public comment period was from April 25, 2022 to May 25, 2022.

A recorded virtual public hearing to present the proposed amendment was available on the City's website on or before April 25, 2022. In addition, during the comment period a draft of the proposed amendment were made available on the City's website, at City Hall in the Community & Economic Development offices, at the Health & Human Services Department offices on Church St, at the Rockford Housing Authority on Winnebago St, and at all of the Rockford Public Libraries.

No comments were received.

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#### Public Notices

**NOTICE OF AN OPPORTU-  
NITY FOR A PUBLIC  
HEARING AND WRITTEN  
COMMENTS**

In accordance with the requirements of the Illinois Health Facilities Planning Act, notice is given of the receipt of an exemption application for the 8-bed expansion of the neonatal intensive care unit located at SwedishAmerican Hospital, 1401 East State Street, Rockford, Illinois (#E-031-22). The Applicants are SwedishAmerican Health System Corporation and SwedishAmerican Hospital, and the University of Wisconsin Hospitals and Clinics Authority, Madison, Wisconsin. The licensee and the owner of the site is SwedishAmerican Hospital. The cost of the project is \$1,978,023.

This exemption application was called complete on April 19, 2022. A request for a public hearing must be made no later than May 4, 2022. All requests must be by letter to the address below (no faxes or emails will be accepted).

Debra Savage, Chairwoman  
Illinois Health Facilities and  
Services Review Board  
525 West Jefferson Street  
(2nd Floor)  
Springfield IL 62761  
217-782-3516  
(TTY #800-547-0466 for  
hearing impaired only)

4/24/2022

**NOTICE OF PUBLIC  
HEARING & DISPLAY OF  
THE CITY OF ROCK-  
FORD'S SUBSTANTIAL  
AMENDMENT TO THE  
2020-2024 CONSOLIDATED  
PLAN AND 2022 ANNUAL  
ACTION PLAN**

**FOR PUBLIC COMMENT**  
Notice is hereby given that the City of Rockford (City) will hold a recorded virtual public hearing to summarize a draft of the City's Substantial Amendment to the 2020-2024 Consolidated Plan and 2022 Annual Action Plan, which will also be on display for public comment. The recorded public hearing will be made available for review and comment on or before Monday 4/25/2022, on the City's website at [www.rockfordil.gov](http://www.rockfordil.gov). The amendment addresses program income (PI) and the disposition of four properties related to the Neighborhood Stabilization Program (NSPI) funding. The NSPI grant PI will become Community Development Block Grant PI and the disposition of the properties will be carried out according to CDBG regulations. This amendment will be submitted to HUD immediately after comments have been considered. The Substantial Amendment

## Public Notices

draft will be made available on Monday, April 25, 2022. It will remain available for public display and comment through Wednesday, 5/25/2022 at 5 P.M. These documents may be found on the City's website [www.rockfordil.gov](http://www.rockfordil.gov) and at the following locations: City Hall Community & Economic Development Dept. (425 E State St - 2nd floor), City Health & Human Services Dept. (612 N Church St), the Rockford Housing Authority (223 S Winnebago St), and the following Rockford Public Library locations (214 N Church St, 1238 S Winnebago St, and 6685 E State St). Should you have any difficulty accessing any of the drafts, please call 779-348-7162.

City Staff encourages all interested parties, including Rockford citizens, to comment regarding all of the Substantial Amendment draft. Comments will be taken into consideration when finalizing the amendment. Written comments may be addressed to Sarah Brinkmann, Housing and Program Manager, Dept. of Community and Economic Development, 425 East State St, Rockford, IL 61104 or emailed to [sarah.brinkmann@rockfordil.gov](mailto:sarah.brinkmann@rockfordil.gov), or dropped off at the Dept. of Community & Economic Development located on the 2nd Floor at City Hall (425 East State St). If special arrangements need to be made to accommodate any resident in order for them to view the public hearing, including translation services, please call Rea Anderson, Community & Economic Development Dept., City of Rockford, at (779) 348-7162, to make those arrangements.

## Public Sale

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## Engineering-IT

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**Substantial Amendment**  
**City of Rockford 2020-2024 Consolidated Plan**

In the planning process for the 2022 Annual Action Plan, the City of Rockford submitted a substantial amendment that moved 2021 Annual Action plan funding from our Homeowner Rehabilitation and Economic Development strategies into the Community Development called Infrastructure. Subsequently, funding for Infrastructure was approved for the 2022 budget and the City plans to budget funds for Infrastructure in 2023, and 2024.

Although the CDBG-CV funds were an amendment of the 2019 Annual Action Plan, HUD required reporting to be included in the 2020 reporting. Therefore, the numbers here account for the additional CDBG-CV activities in Economic Development (Goal EDS-2).

Additionally, the City plans to provide for more Housing Development and to remove blighted commercial buildings. Therefore, Housing Rehab and ED budgets and goals have been aligned with planned spending for 2023 and 2024.

In order to realign the metrics with the above, the goals will be amended throughout the 2020-2024 Consolidated Plan to the following:

<b>Goal</b>	<b>Category</b>	<b>Original Plan Source / Amount</b>	<b>Amended Plan Source / Amount</b>	<b>Unit of Measure</b>	<b>Original – Strategic Plan</b>	<b>Amended – Strategic Plan</b>
AMS-1 Overall Coordination	Administration, Planning, and Management	CDBG: \$1,866,305 HOME: \$491,275 ESG: \$68,315	CDBG: \$1,866,305 HOME: \$491,275 ESG: \$68,315	Other	15	15
CDS-2 Infrastructure	Non-Housing Community Development	CDBG: \$0	CDBG: \$1,500,000	Other	0	3
CDS-6 Clearance / Demolition	Non-Housing Community Development	CDBG: \$2,067,705	CDBG: \$2,067,705	Buildings	175	175
EDS-1 Employment	Economic Development	CDBG: \$977,855	CDBG: \$677,855	Businesses Assisted	15	10

Goal	Category	Original Plan Source / Amount	Amended Plan Source / Amount	Unit of Measure	Original – Strategic Plan	Amended – Strategic Plan
EDS-2 Development	Economic Development	CDBG: \$415,990	CDBG: \$290,990	Jobs	0	0
				Businesses Assisted	10	78
				Other	0	0
HMS-1 Housing	Homeless	ESG: \$340,000	ESG: \$340,000	Other	5	5
HMS-2 Operation / Support	Homeless	ESG: \$225,000	ESG: \$225,000	Other	10	10
HMS-3 Prevention and Re-Housing	Homeless	ESG: \$289,890	ESG: \$289,890	Other	5	5

Goal	Category	Original Plan Source / Amount	Amended Plan Source / Amount	Unit of Measure	Original – Strategic Plan	Amended – Strategic Plan
HS-1 Housing Development	Affordable Housing	HOME: \$1,283,890	HOME: \$2,385,658	Household Housing Unit	5	35
				Other	5	3
HS-2 Housing Rehabilitation	Affordable Housing	CDBG: \$3,450,000 HOME: \$2,754,420	CDBG: \$2,375,000 HOME: \$1,432,587	Household Housing Unit	275	125
HS-3 Homeownership	Affordable Housing	HOME: \$383,175	HOME: \$603,240	Households Assisted	25	40
HS-4 Fair Housing	Affordable Housing	CDBG: \$50,000	CDBG: \$50,000	Other	5	5
HS-5 Project Delivery	Affordable Housing	CDBG: \$2,011,740	CDBG: \$2,011,740	Household Housing Unit	5	35
				Household Housing Unit	110	20
				Households Assisted	25	40
				Other	5	3

**Amendment #3 (Substantial)**  
**Realignment of Strategic Goals**  
**Citizen Participation**

Public Notice for two public hearings held on November 8, 2022, one at noon and the other at 5:30 pm, at the Rockford public library was published in the Rockford Register Star on October 23, 2022. Public Notice for drafts of the amendment being available for public review & comment was published in the Rockford Register Star on November 6, 2022. In addition to this publication, information was provided through social media, and emails were sent using the City's Community and Economic Development Department (CEDD) internal contact list for housing, economic development, and community development organizations. This list includes, but is not limited to, economic development, fair housing, homeless and housing agencies, neighborhood organizations, and interested persons requesting to receive notifications.

The required 30 day public comment period was from November 7, 2022 to December 6, 2022.

A draft of the proposed amendment was made available on the City's website, at City Hall in the Community & Economic Development offices, at the Health & Human Services Department offices on Church St, at the Rockford Housing Authority on Winnebago St, and at all of the Rockford Public Libraries. In addition, a recording of the public hearing presentation with voice over explaining each slide was available on the City's website during the public comment period.

No written comments were received.





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# Ad Preview

## NOTICE OF AVAILABILITY OF THE CITY OF ROCKFORD'S 2023 ANNUAL ACTION PLAN, AMENDMENT TO THE 2020-2024 CONSOLI- DATED PLAN GOALS AND CITIZEN PARTICIPATION PLAN UPDATES FOR PUBLIC REVIEW & COMMENT

Notice is hereby given that drafts of the City of Rockford's 2023 Annual Action Plan (AAP), amendment to the 2020-2024 Consolidated Plan and minor updates and clarifications to the Citizen Participation Plan (CPP) will be on display for review and public comment starting Monday, 11/7/2022.

The AAP summarizes available funding resources, as well as related proposed activities designed to meet community, housing, and economic development needs in Rockford. The AAP describes how 2023 Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME) and Emergency Solutions Grants (ESG) funds will be spent. The funding levels of \$2,166,237 for CDBG funds, \$1,097,631 in HOME funds, and \$188,681 for ESG funds are contingent upon the final approval of the Federal FY 2023 budget. Therefore, the 2023 AAP will be submitted to the U.S. Department of Housing and Urban Development (HUD) after HUD announces, and the City incorporates, the final FY 2023 allocation amounts in the 2023 AAP. In addition, the City plans to amend the 2020-2024 Consolidated Plan goals to align with previous amendments to the 2021 AAP, and to make minor updates and clarifications to the CPP. The amendment will be submitted to HUD immediately after comments have been considered. However, the CPP will be submitted with the 2023 AAP.

All of the draft documents will be made available Monday, 11/7/2022, through Tuesday, 12/6/2022. These documents may be found on the City's website [www.rockford.il.gov](http://www.rockford.il.gov) and at the following locations: City Hall Community & Economic Development Dept. (425 E State St - 2nd floor), City Health & Human Services Dept. (612 N Church St), the Rockford Housing Authority (223 S Winnebago St), and the following Rockford Public Library locations (214 N Church St, 1238 S Winnebago St, and 6685 E State St) during office hours. Should you have any difficulty accessing any of the drafts, please call 779-348-7162.

City Staff encourages residents, public agencies and other interested parties, to comment regarding all of the draft documents. Comments received by 5pm 12/6/2022 will be taken into consideration as these documents are finalized by the City. Written comments may be addressed to Sarah Brinkmann, Housing and Program Manager, Dept. of Community and Economic Development, 425 East State St, Rockford, IL 61104 or emailed to [sarah.brinkmann@rockford.il.gov](mailto:sarah.brinkmann@rockford.il.gov), faxed to (815) 967-6933, or dropped off at the Dept. of Community & Economic Development located on the 2nd Floor at City Hall (425 East State St).

Si desea hablar sobre el contenido de este aviso con alguien que hable español, comuníquese con Giselle Martínez (779-348-7439) o Lucía Sorio-McFarlane (779-348-7441).

11/6/22

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## **PROOF OF PUBLICATION**

Rea Anderson  
Community Development  
City Of Rockford  
425 E State ST  
Rockford IL 61104-1014

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That the attached or annexed was published in the issue dated:

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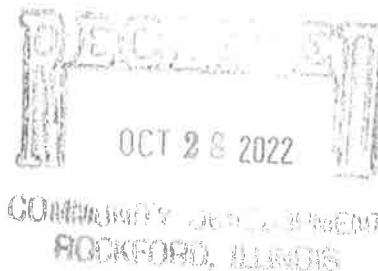
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## **NOTICE OF PUBLIC HEARING**

Notice is hereby given that the City of Rockford (City) will hold two public hearings on Tuesday, November 8th, 2022 at the Montague Library (1238 S Winnebago St). The purpose of this public hearing is to provide an overview of the City's 2023 Annual Action plan draft & provide the public with an opportunity to express their ideas & views on housing & community development needs. The draft plan will be posted prior to the hearing. Comments will be noted & responded to as we finalize our 2023 Annual Action Plan. The City will also share planned updates to our Citizen's Participation Plan & our goals in the 2020-2024 Consolidated Plan.



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## Public Hearing 2023: November 8, 2022

*RED: Questions and responses from the meeting held at noon.*

*BLUE: Questions and responses from the meeting held at 5:30 PM.*

### Annual Action Plan

#### Housing Strategy:

- We've moved money from HOME rehab to Housing Development
- We will have some CDBG carryover for rehab
- We've increased the amount of down payment assistance anticipated
- **Q: What's the average down payment assistance you see?**
  - **A: \$14,999.00. Case by case, based on what's needed. Always under \$15k.**
- **Q: How many banks are we working with for down payment assistance currently?**
  - **A: 6.**
- **Q: What is low to moderate income?**
  - **A: 80% Area Median Income. Determined by HUD.**
- **Q: What areas in the City does that cover?**
  - **A: Low to moderate income households anywhere within the City as long as they income qualify. For the other developments, (CHDO) we are looking at the end use and who will live in that development. Some programs we can do in an area (low income) then we can qualify the entire area. Homeowner Rehab is based on the person that lives in the house and if they income qualify for our program.**
- **Q: How do you decide on the number of the units? 10 (HB) doesn't seem like a lot for our population.**
  - **A: We do not get many applications for the program. It is a gap financing tool to help make the payment affordable.**
- **Q: So, the program is for people that are already in the process of buying a house not someone that can't afford to buy a house?**
  - **A: We could actually do either.**
- **Q: What is the income that you are looking at?**
  - **A: They are in our brochure on the table.**
- **Q: Lenders?**
  - **A: They are also in the brochure.**
- **Q: How is Habitat for Humanity perceived in this area, as a developer?**
  - **A: They are all volunteer labor. They do 5 builds per year. They have been the most consistent for taking out permits for new builds.**
- **Q: Is anything going to be going on with 515 Seminary?**
  - **A: Yes, RHA owns those properties and are taking RFP's for them.**

#### CDBG Housing Strategy:

- We have increased the amount for Demolition, as we are looking to do more commercial demos
  - We have a lot of blight (commercially) that we want to tackle. There are a lot fewer homes being demolished.

- We have set aside some for infrastructure as well
- Q: Are there any statistics showing that demos have increased the property values of the properties surrounding?
  - A: We track overall neighborhood. How are these census tracts improving as a whole? (Not necessarily EAV) Demolition is not our first option, unless totally irredeemable. No longer looking for residential properties to demo—trying to tackle commercial more.
- Q: Do you have an estimate of what the total EAV for the demolitions are for the last several years?
  - A: Lost EAV? Yes. What you lose is not necessarily the EAV, it's more the opportunity cost that is lost. We can pull that info though (FMV).
- Q: How many homes have been moved to the land bank?
  - A: They are increasing in capacity, so they can do more. They are greater than just the city of Rockford, but probably about 30 in the last 2-3 years. They have a great slide deck highlighting their successes.
  - A: Trustee success as well.
  - A: Homes must be legally vacant and 2 years on their back taxes. Acquisition with the land bank is about 6 months.

#### Economic Development Strategy:

- Establishing a new app process for ED CDBG.
- Q: Is there a min or max?
  - A: Generally \$25k. No minimum—however-- because of the regulations being so extensive, there is a reasonableness test. We are trying to figure out how do we make sure everyone is aware these funds are available, and how do we get the best return on investment? Intended to be gap financing. Not trying to be the sole funder. We want to make sure businesses stay open.
- Q: What type of businesses?
  - A: Generally small businesses, not not-for-profits.

#### Homeless Strategy (ESG):

- ESG-HP: Homeless prevention. ESG-RR: Rapid Rehousing.
- Q: Anything in particular for the homeless veterans?
  - A: That is something they are always looking at, we were at 0 at one time. This money would be used to fund an organization that would focus on homelessness for veterans.

#### Administration, Planning, & Management Strategy (CDBG, HOME, & ESG):

- ERs for projects, hearings like this one, consolidating, planning, HOME ARP Consultation, marketing
- CDBG: Usually 16-18% used (20% allowed)
- Will not get 2023 money for a while, so we are estimating our allocation. We are usually pretty close, so it is a small adjustment. Won't find out until June/July, and won't receive until August/September.

- 15% CHDO set-aside has to be used for Housing development.

#### Additional Local Policy & Programming Details:

- Still have some COVID related money left.
- IHDA SCP: \$75k.
- Section 108 loans: opportunity to leverage future CDBG funding for larger capital improvements. Cliffbreakers is an example. They pay us back on it, and we use that toward CDBG-eligible projects. The market the way it is right now is not a good development opportunity.
- **Q: Are the investors of Cliffbreakers making their payments on time?**
  - **A: Yes they are. We have collateral, should they not.**
- **Q: At this time, what is your forecast of the Cliffbreaker's building?**
  - **A: I'm not sure but I know they are making the payments they have to. They did do a remodel after receiving these funds and held events. The hotel is fully functional.**
- If we were to substantially change anything, we would need to do a substantial amendment. The public would be informed and would have a chance to comment.
- **Q: What happens to the land when residents are demolished?**
  - **A: We are demolishing much fewer residents than prior years. Right now, we give it to the land bank or we work out an arrangement with the owner. We normally do not own the land to be able to say what happens to it after the demolition.**
- **Q: Is the land bank a private entity?**
  - **A: No, it's housed at R1P Council.**

#### Fair Housing:

- Need to affirmatively further fair housing.
- Q: Source of income is also a protected class.
- **Q: Definition of Protective Order Status?**
  - **A: I believe this is if I have a protective order against someone a landlord can't not rent to me because of the order.**

## 2020-2024 Consolidated Plan Amendment

Moved money to Housing Rehab and Development, Homebuyer, ED Development and from Project Delivery

## Citizen Participation Plan

May summarize public comments instead of verbatim, use other publication besides RRStar

- Q: How do you balance putting money into neighborhoods and not pricing out the people you are trying to help?
  - A: We are looking at now where the market is. When the current strategies were created it was 2019. We were trying to do multiple things that would look at what partners we had and what could be done hoping to increase median income.
- Q: Will future plans include the land at Barber Colman?
  - A: Yes, it will. It will be residential new construction there.
- Q: What will the price be for those residential properties?
  - A: They'll be market rate, not for low income.
- Q: Breaking ground date?
  - A: The planning is for next year if all goes well.
- Q: I'd think the concern for current property owners in the area is that their taxes will increase.
  - A: Our current Mayor's initiative has been to flatten and then decrease property tax but we need property values to increase to level it out.
- Q: What is the future of the Fairground project?
  - A: I'm not sure. I can get information to you about that. With our ER, there is no plan for the future in that specific area. It may be demolished or there may be a development. The Rockford Housing Authority actually owns that property.
- Q: The hard part becomes when "that is enough" in that neighborhood.
  - A: That happened at a couple neighborhoods in Chicago and then it just took off with growth around the area. There is now actually a program where if you have lived in a residents for a certain number of years, your property tax will be frozen so you don't get priced out of your house.

## Planning Calendar

Comment period is now open. Done December 6, 2022.

Approved by City Council, and adjustments made when allocation is given.

Comments to Sarah Brinkmann.

## Questions:

Q: What is HHS budget for 2023? Do they get any City funding?

A: No City funding. Owen will have to answer budget questions. They are hoping to add more to their programs.

Q: In the process of 2023 planning, are past studies being used? What is driving our decisions on investment? Tipping zones? How are you choosing a strategic direction?

A: NRSA and NRN. We did go through these. We don't want to be too restrictive. NRSA provides flexibility, but still restrictive. NRN helps us deploy resources. We don't restrict our work to those areas, but we do prioritize those areas. We always want to go with our best eligible applicants, regardless of area. Are we improving or not? It has been a helpful tool, and we will update those numbers as well.

Q: Are we focusing on tipping/middle neighborhoods? Youngstown example. We are seeing more rental in that area (Rolling Green) too, which means it could go downhill.

A: Rolling Green has had positive code enforcement responses

A: Habitat Critical Repair program is very helpful in home repair, as it is not as restrictive. We have to look at outside organizations and how to advocate for them. We do have challenges, so we do want to work with other non-profits.