



HOME-ARP ALLOCATION PLAN

FY2021 ANNUAL ACTION PLAN SUBSTANTIAL AMENDMENT

CITY OF ROCKFORD, IL
COMMUNITY HOUSING & ECONOMIC DEVELOPMENT DEPARTMENT

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Introduction

On September 2021, the U.S. Department of Housing and Urban Development (HUD) allocated \$3,579,012 to the City of Rockford, Illinois, under a new grant program called HOME Investment Partnerships - American Rescue Plan (HOME-ARP).

HOME-ARP grant funds are designed to reduce homelessness and increase housing stability across the city for individuals or households experiencing homelessness, or at risk of homelessness, or members of other vulnerable populations. The program allows the City to provide homelessness assistance and supportive services to address housing instability. HOME-ARP guidance states that these funds must be used to primarily benefit the qualifying populations through the four eligible activities: (1) Tenant Based Rental Assistance (TBRA), (2) development and support of affordable housing, (3) provision of supportive services; and (4) acquisition and development of non-congregate shelter (NCS) units.

Per HUD Notice CPD-21-10, HOME-ARP funds must be used to primarily benefit individuals or families from the following qualifying populations who are:

- Homeless, as defined in 24 CFR 91.5, under categories (1), (2), or (3)
- At risk of homelessness, as defined in 24 CFR 91.5
- Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by HUD in CPD 21-10.
- Other Populations who:
 - Requiring services or housing assistance to prevent homelessness
 - At the greatest risk of housing instability
- Veterans and families that include a Veteran family member that meets the criteria for one of the qualifying populations above.

To receive funding, the City must develop and submit a HOME-ARP Allocation Plan to HUD, which describes the distribution of HOME-ARP funds and identifies any preferences for eligible activities. The development of the HOME-ARP Allocation Plan must also be informed through stakeholder consultation and community engagement. As required by HUD, the City's submission of this HOME-ARP Allocation Plan (Plan) to HUD will be an amendment to its Fiscal Year 2021 Annual Action Plan.

Consultation

Describe the consultation process, including methods used and dates of consultation:

The City of Rockford consulted with the local CoC, veteran's groups, public housing agencies, fair housing groups, disability advocates, and other stakeholders whose clientele includes members of the HOME-ARP qualifying populations to identify unmet needs and gaps in housing or service delivery systems. The identified stakeholders have first-hand knowledge of the needs of the qualifying populations and where the gaps in the service-delivery system lie.

On January 11, 2023, the City of Rockford solicited consultations with stakeholders and commenced consultations on November 17, 2022, through February 3, 2023. During the development of this plan, the City interviewed vital stakeholders in one-on-one meetings and small focus groups to determine current services provided in the community and potential collaborations for providing services under HOME-ARP. Stakeholders were asked to describe the services they provide for the qualifying population and to describe the size and demographic composition of their clients. They were also asked to describe the need and gaps in services and identify any current resources addressing them. Lastly, the stakeholders were asked to identify priority needs and preferences and provide input on using HOME-ARP funds to address current housing and service delivery needs effectively.

Stakeholders verbally described the needs and gaps in services during the interview, and detailed notes were taken to capture each stakeholder's point of view. Additionally, the City distributed an online survey to gather additional input about the community's needs. The consultations helped establish a foundation for the HOME-ARP Allocation Plan by identifying the needs, services gaps, and how HOME-ARP grant funds can best serve the qualifying populations. The City will use this information to inform its strategy to distribute HOME-ARP funds for qualifying populations.

The following table shows the agencies consulted, the type of agency, the method of consultation, and any feedback provided about the needs and gaps in services in the community.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
<p>City of Rockford Health and Human Services</p>	<p>CoC(s)</p>	<p>Interview</p>	<p>Demand for rent assistance is high. Unmet needs include non-congregate shelter due to capacity issues, quality, affordable units, source of income protections, and adequate major systems in homes like heating and water. Issues include property owners with poor intentions, like not wanting property inspections and pursuing illegal evictions, and high condemnation rates. Characteristics associated with instability include gig employment, domestic violence, generational poverty, crime, and lack of education and training. Demand for rent assistance is high for youth under 25.</p>
<p>Northern Illinois Homeless Coalition</p>	<p>CoC(s)</p>	<p>Interview</p>	<p>Community and Economic met with the Northern Illinois Homeless Coalition. Feedback was provided in a small group setting. Needs include more affordable units, property owners educated about</p>

			working with assistance programs, sources of income protections, improved condition of housing, and less predatory leases. Instability associated with couch surfing, substance abuse, burned bridges with family/support networks, mismanagement of income, bad quality of housing, lack of major systems in the home like heating and plumbing, and lack of basic home maintenance.
Family Peace Center	Domestic Service Providers	Interview	<p>Shelter capacity is an issue because beds fill up quickly, and hotels are at capacity. DV clients do not have documented history of homelessness and are not eligible for certain City services. Survivors with children and pets are hard to shelter due to shelter restrictions. Survivors do not have good rental history to secure adequate housing. Clients need long-term solutions to provide a fresh start with permanent stability. Additional units are needed due to COVID restrictions on congregate shelters. The City needs another shelter to provide more subsidies for the current housing stock and to build new units where DV survivors are prioritized.</p>
Liam Foundation	Public or private organizations that address civil rights	Small Group Forum	The agency provides resources for the LGBTQ community. More than half of clients are youth under age 25 with a lack

			<p>of family support networks. There is a lack of shelter options due to lifestyle. The community needs inclusive shelters with fewer barriers to entry. Developing a crisis center with inclusive systems to include client programming such as financial literacy, substance abuse education, or sex trafficking awareness. The City needs solutions-based programs that move clients to stable, permanent housing.</p>
NiREACH	Public housing agency	Interview	<p>Nonprofit Housing Provider that administers project-based vouchers, VASH, and traditional vouchers. Families at greatest risk of housing instability need supportive services that provide clients with the tools and resources to maintain stable housing. These families include youth aging out of foster care and people reentering society from prison. Current shelter, housing, and service delivery gaps include agencies working in silos.</p>
Prairie State Legal Services	Public or private organizations that address civil rights and fair housing	Small Group Forum	<p>The community needs inclusive shelters with fewer barriers to entry. Developing a crisis center with inclusive systems to include client programming such as financial literacy, substance abuse education, or sex trafficking awareness. The City needs solutions-based programs that move clients to stable, permanent housing.</p>

<p>RAMP Center for Independent Living</p>	<p>Public or private organizations that address the needs of persons with disabilities</p>	<p>Small Group Forum</p>	<p>RAMP-CIL is a nonresidential center for persons with disabilities. Feedback was provided in a collective group forum. Unmet housing needs include a lack of affordable inventory, shortage of 1-bedroom units, very low income of clientele, units not accessible for those with disabilities, and property owners are not sympathetic to clients with evictions even with subsidies, and no inclusive housing for the LGBTQ community or domestic violence survivors. Property owners need education and incentives to improve conditions for tenants and to release more inventory for vulnerable populations. Housing stability is key for vulnerable citizens. Without housing, case managers cannot assist with the root causes of poverty. The main goal is to assist clients in becoming independent.</p>
<p>Remedies Renewing Lives</p>	<p>Domestic Service Providers</p>	<p>Interview</p>	<p>Domestic Violence service provider for Boone and Winnebago County operates a crisis hotline. Provide individual therapeutic services and transitional housing. Housing is a significant barrier for any survivor. COVID has exacerbated the problem. All clients are referred to a single point of entry, and it is up to the client to access the system. Property owners and building owners are hesitant</p>

			to accept assistance funding. Most survivors have an eviction history. People are staying in shelters for longer than the 3-month standard. There are limited housing options with long turn-around times to place someone in housing. Not enough affordable, safe units with property owners willing to work with survivors. There are not enough transitional housing units. Characteristics associated with housing instability include being a survivor of domestic violence, stalking or sex trafficking. Shelter is the heart of DV programs but only a temporary solution.
Rockford Housing Authority	Public housing agency	Interview	Manages 1200 units of public housing and/or subsidized housing. Market study revealed that there was a shortage of 4900 units in the area. Many of the clients for RHA are single African American women with 2 children who are unemployed or underemployed. The needs are transitional housing for domestic violence survivors, reentry programs, and homeownership. Has not been able to use City rental assistance to supplement public housing rent. New unit development needs to include supportive services onsite with a small footprint of 4-6 units. Waitlists are long.

Rockford Rescue Mission	Homeless Service Providers	Interview	<p>Only congregate shelter in the Northern Illinois Homeless Coalition area. The shelter is currently full and operating at a reduced capacity due to staffing issues. Currently housing up to 65 men and 65 women with a max capacity of 125 men and 120 women. Also operates the overnight café for 50 people from January 1st through March 31st. Housing instability is associated with a lack of affordable units, low wages, evictions, and generational poverty. The shelter is seeing an increased risk of youth under 25 accessing services. Would like to see the City acquire an old hotel and convert it to a non-congregate shelter to address needs or provide additional rental assistance and supportive services to sustain permanent housing. Providing additional life-skills training like financial literacy and basic home maintenance. Differentiate domestic violence and partner abuse.</p>
Rosecrance	Homeless Service Providers	Small Group Forum	<p>Behavioral health provider, shelter plus care administrator, and manages 12 VA beds. Feedback was provided in a small group setting. Needs include more affordable units, property owners educated about working with assistance programs, sources of income protections,</p>

			improved condition of housing, and less predatory leases. Instability associated with couch surfing, substance abuse, burned bridges with family/support networks, mismanagement of income, bad quality of housing, lack of major systems in the home like heating and plumbing, and lack of basic home maintenance.
Salvation Army	Public agencies that address the needs of qualifying populations	Small Group Forum	<p>Administers homeless-related programs in the community. States that about 5-10% of the Rockford population is experiencing some form of homelessness. Gaps in services include having a single point of entry system. Most clients are not patient and do not have the resources to follow this system. The system is too narrow for the population size (250k+). HUD's definition of homelessness does not align with the transient population that is living house to house, which puts a financial burden on the households trying to assist.</p> <p>Characteristics of housing associated with instability and an increased risk of homelessness include domestic violence, which is the top crime in Rockford, mental health, and unseen homeless (i.e., Transient Individuals (couch surfing)).</p>

Veteran's Administration	Veterans Groups	Small Group Forum	<p>Veteran's Administration administers VASH vouchers for veterans. Feedback was provided in a collective group forum. Unmet housing needs include a lack of affordable inventory, shortage of 1-bedroom units, very low income of clientele, units not accessible for those with disabilities, property owners are not sympathetic to clients with evictions even with subsidies, and no inclusive housing for the LGBTQ community or domestic violence survivors. Property owners need education and incentives to improve conditions for tenants and to release more inventory for vulnerable populations. Housing stability is key for vulnerable citizens, without housing case managers cannot assist with root causes of poverty. The main goal is to assist clients in becoming independent.</p>
Veteran's Path to Hope	Veterans Groups	Small Group Forum	<p>Veterans Path to Hope is a nonresidential center for veterans to receive housing and other assistance. Feedback was provided in a collective group forum. Unmet housing needs include a lack of affordable inventory, shortage of 1-bedroom units, very low income of clientele, units not accessible for those with disabilities, property owners are not sympathetic to clients with evictions even</p>

			with subsidies, and no inclusive housing for the LGBTQ community or domestic violence survivors. Property owners need education and incentives to improve conditions for tenants and to release more inventory for vulnerable populations. Housing stability is key for vulnerable citizens. Without housing, case managers cannot assist with root causes of poverty. The main goal is to assist clients in becoming independent.
Zion Community Development Corporation	Public agencies that address the needs of qualifying populations	Small Group Forum	Zion CDC is a community development corporation that develops housing for low income. Feedback was provided in a collective group forum. Unmet housing needs include a lack of affordable inventory, shortage of 1-bedroom units, very low income of clientele, units not accessible for those with disabilities, property owners are not sympathetic to clients with evictions even with subsidies, and no inclusive housing for the LGBTQ community or domestic violence survivors. Property owners need education and incentives to improve conditions for tenants and to release more inventory for vulnerable populations. Housing stability is key for vulnerable citizens. Without housing, case managers cannot assist with root causes

				of poverty. The main goal is to assist clients in becoming independent.
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Table 1: Summary of Consultation Feedback

Summarize feedback received and results of upfront consultation with these entities:

Community Needs:

- More quality, affordable units for families of all sizes and income ranges. The consultation revealed that many units are in poor condition and not suitable for living.
- More non-congregate units especially for those fleeing domestic violence and with severe mental health issues. The composition of the family may not be suitable for congregate shelter options, and in these instances, parents fleeing domestic violence are often separated from their children. Also, shelter programs cannot manage certain mental illness diagnoses in a congregate setting which can cause an unsafe environment for other guests of the shelter.
- More shelter and housing options for youth under 25 as there has been an increase in youth homelessness. Homeless youth often lack support networks to assist them in attaining permanent housing and are often aging out of foster care or identifying as LGBTQ.
- Rockford needs more supportive services to include case management, financial literacy, property owner/tenant rights education, mental health counseling, drug abuse education, and legal assistance.

Administrative Needs:

- More funding for staffing due to staff shortages at emergency shelters and service provider agencies. The consultation revealed that there are underutilized/vacant shelter beds that cannot be used because of staffing shortages.
- Faster response time with assistance payments. Service providers stated that a barrier to housing clients with subsidies is delayed payments/reimbursements for rental assistance.
- Improved relationships between property owners, tenants, and service providers. The consultation revealed that the current relationship between private property owners and the service providers is fragile. Property owners do not trust the system and refuse to rent to clients receiving assistance. They are issuing predatory leases and refusing tenants with prior evictions.
- Review of city policies to ensure current policy support ongoing efforts to improve housing stability. The consultation revealed that some areas have outdated zoning regulations that prevent the development or use of shelters or residential units. Policies should be reviewed and updated accordingly.

Public Participation

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

Assessing community housing needs and receiving public input is one of the most important steps in preparing the HOME-ARP Allocation Plan. The City of Rockford has assessed data and feedback from stakeholders and citizens on the projects and activities being proposed or undertaken that will address those needs utilizing HOME-ARP grant funding from HUD.

To notify the public of the development of the Plan, the City of Rockford distributed virtual surveys through various internal departments and nonprofit organizations to obtain feedback from public. Surveys were available from January 29, 2023- February 13, 2023. Using the same notification methods, the City of Rockford Community & Economic Development Department published the Proposed HOME-ARP Allocation Plan and Amended Annual Action Plan public hearing notice in the Rockford Register Star on February 15, 2023. Two public hearings will be conducted to inform the public of the proposed HOME-ARP activities and to receive citizen input on said recommendations. The public comment period for citizen input commenced on the date of the published public notice on February 22, 2023, and ended on March 9, 2023.

The City of Rockford Community & Economic Development Department office will conduct its public hearings on Thursday, March 2, 2023, at noon and 5:30 pm. Public comments received at the public hearings will be summarized in this section before the final draft is submitted to City Council and HUD for approval.

The timeline for public comment is listed below:

- **Public Notice Published:** Wednesday, February 15, 2023
- **Public Comment Period:** Wednesday, February 22, 2023, through Thursday, March 9, 2023
- **Public Hearings:** Thursday, March 2, 2023, at 12:00 noon and 5:30 pm

Describe efforts to broaden public participation:

The City of Rockford is committed to keeping all interested groups and individuals informed of each phase of the planning process. Rockford will continue to maintain communication with citizens, nonprofit organizations, local agencies, City & County offices and officials, and stakeholders by implementing the following efforts:

- Conduct virtual or in-person workshops and public hearings in various formats or at multiple venues throughout the city.

- Ensure meetings are held at a convenient time and location for citizens and stakeholders to attend and have ADA accessibility for all persons with disabilities and interpretation for limited English proficiency clientele when requested.
- Use of electronic, digital, and printed media to solicit public participation through various media outlets to citizens, Municipal employees, nonprofit organizations, and local businesses.
- Translate public notices and related materials for limited English proficiency clientele when requested.
- Review and respond to all citizen comments and incorporate such comments in required submissions, as applicable.
- Analyze the impact of program activities on neighborhood residents, particularly low and moderate-income persons.

Summarize the comments and recommendations received through the public participation process either in writing or orally at a public hearing:

All comments received at the public hearings are summarized here for review by the City Council for approval and HUD. Representatives from nonprofit service providers, the housing authority, city staff, and the realtor's association attended the public hearing on March 2, 2023, held at Katie's Cup. Participants asked the following questions, and subsequent answers were provided.

1. Why is no money allocated to the non-congregate shelter activity when the needs identified a need for more non-congregate shelter units?
 - Answer: The amount of funding available is not enough to address that need, and the city has identified preferences for other qualifying populations. Other funding will be utilized to support current shelter options.
2. Will any funding be allocated to crisis services for those that cannot go to current shelters, such as members of the LGBTQ community?
 - They will be considered with other clients if they meet the criteria for funding.
3. Will supportive services funds go to other agencies that provide services? Will all money go directly to Remedies?
 - Yes, the city will do an application cycle or open RFP for agencies to apply.
4. Has a funding source been identified for long-term maintenance of the newly developed rental units?
 - No, that is going to be phase two, where the city seeks technical assistance on how to address long-term compliance.
5. How many units will \$2 million produce? What is the timeline for implementation?

- Current plans propose 20 units. The city was very conservative in its estimates and hoped to be able to produce more by layering with other funding. The plan is due by the end of March, and the city has until 2030 to complete the project.
6. Does TBRA also include utility assistance?
 - Yes, it can, but it depends on how the agency administers its program.
 7. What does the rental housing funding look like as far as implementation goes?
 - Development of new rental units. Will be able to identify a more detailed plan once proposals are submitted.

Other general comments received included the following:

- a. Remedies is only designed to serve women and children, but there are several families that do not meet the criteria because they have a male child.
- b. Please do not give Rockford Rescue Mission any more funding. They do not follow HUD's regulations in serving anyone who meets the criteria; they turn away people that do not believe in Jesus.
- c. Rockford needs to create something that does not exist. They need shelter to serve all community members regardless of religious affiliation.
- d. It is tough to serve people in the community with the lack of options.
- e. Equitable Social Solutions in Madison has a hotel-to-housing program that could be a good model to replicate in Rockford.
- f. Current shelter options do not allow families to stay together. Men must go to separate areas from wife and female children. If the male child is of a certain age, they cannot remain with the mother.
- g. LIAM foundation (LGBTQ) feels the agency is always overlooked and underfunded. The city needs to put more funding towards the issue and concern for other members of the community. The agency provided service to over 156 clients last year.

Participants from the public and media attended the second meeting held on March 2, 2023, at Crusaders Clinic Community Room, and the following comments were received:

1. What does over \$2million for rental housing mean?
 - The city is proposing to create approximately 20 new units of housing. The City is giving preference to victims fleeing domestic violence or accompanied youth.
2. When you say "affordable," is that the same as public housing?
 - No, units will not be owned by Housing Authority. They [applicants] may be able to connect through the Housing Authority for assistance.

3. Is there an identified area for the 20 units?

- No, it is still in the planning phase. Once the plan is approved, the city will put out an RFP to solicit proposals from developers.

Other general comments received were as follows:

It is important for residents in the community to be a part of the process of moving things in new and positive directions. Want more efforts to be made by the leaders to include current residents in the planning and development process of new projects. Citizens must take up responsibility for the direction of their community. If they are not engaged, they will be on the downside of the redevelopment of this [13th Ward] area.

Summarize any comments or recommendations not accepted and state the reasons why:

Any written or verbal comments or recommendations were accepted.

Needs Assessment and Gaps Analysis

Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family	Adult	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds	HH (at least 1 child)	HH (w/o child)			# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	95	27	208	208	0								
Transitional Housing	99	39	46	46	14								
Permanent Supportive Housing	167	48	319	319	111								
Other Permanent Housing	53	14	6	6	0								
Sheltered Homeless						235	110	19	52				
Unsheltered Homeless						3	58	2	0				
Current Gap										414	128	579	579

Table 2: Homeless Needs Inventory and Gap Analysis Table

Data Sources: 1. 2022 IL501- Rockford/DeKalb, Winnebago, Boone Counties CoC Point in Time Count (PIT); 2. 2022 IL-501 Rockford/DeKalb, Winnebago, Boone Counties Continuum of Care Housing Inventory Count (HIC); 3. HOME-ARP Consultations

Housing Needs Inventory and Gap Analysis Table

The City of Rockford calculated the level of need using the most recent Comprehensive Affordable Housing Strategy (CHAS) data, which has had three additional releases since the City completed its Housing Needs Assessment for its 2020-2024 Consolidated Plan. This data demonstrates the extent of housing problems and housing needs, particularly for low-income households.

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	33,241		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	2,829		
Rental Units Affordable to HH at 50% AMI (Other Populations)	7,722		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		6,695	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		3,875	
Current Gaps (Net)			19
Current Gaps at 30% AMI			3,866
Current Gaps at 50% AMI			-3,847

Table 3-Non-Homeless Needs Inventory and Gap Analysis Table.

Data Sources: 1. 2021 American Community Survey (ACS) Selected Housing Characteristics; 2. 2015-2019 Comprehensive Housing Affordability Strategy (CHAS); 3. National Low Income Housing Coalition – Out of Reach Report for Rockford MSA -2022; 4. HOME -ARP Consultations

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

All data include Rockford/DeKalb, Winnebago, and Boone Counties because homeless data is collected by CoC and not desegregated by individual cities or counties. Service providers confirm that, effectively, all homeless persons seeking services are in Rockford since all homeless services are in the City of Rockford. The City will only use HOME-ARP funds in the City of Rockford to ensure compliance with HUD guidelines.

Homeless as defined in 24 CFR 91.5

Per HUD's definition of homeless under the HOME-ARP grant, individuals and families considered homeless include:

- An individual or family who lacks a permanent and adequate permanent home.
- A person or family who will imminently lose their permanent home due to a lack of resources or support.
- Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition

At the time of this study, 2023 Point In Time (PIT) Counts were unavailable, so the most recent PIT data was used to describe the size of the population. According to the FY2022 PIT Count, there were 406 homeless persons in the Rockford/Dekalb, Winnebago, and Boone Counties COC.

Homeless Category	Number
Sheltered	345
- <i>Transitional Housing</i>	121
- <i>Emergency Shelter</i>	224
Unsheltered	61
Youth under 25	140
- <i>Unaccompanied</i>	42
Total	406

Table 4: Homeless Count

At Risk of Homelessness as defined in 24 CFR 91.5

HUD defines those at risk of homelessness as individuals and families who have an income below 30% of the area median income (AMI), do not have sufficient resources or support networks to prevent them from becoming homeless or live with instability, like moving two or more times during the last 60 days due to economic reasons.

According to HUD's Comprehensive Housing Affordability Strategy data, there are 11,475 households with incomes less than 30% of Annual Median Income (AMI). Of those households, 8,915 are renters, and 6,695 are experiencing at least one of the following housing problems: cost burden, overcrowding, lack of kitchen facilities, or lack of plumbing facilities. Furthermore, 2,870 experiencing are experiencing all four of the housing problems listed above. According to Community Housing Affordability Strategy Data (CHAS), 100% of renters and 75% of homeowners with incomes less than 30% AMI are cost-burdened, meaning they use more than 30% of their income for housing-related costs.

Stakeholder consultations support these data trends in highlighting the four-housing problem stating that very-low income and being cost-burdened are significant factors in housing instability.

Fleeing, or Attempting to Flee

For HOME-ARP, this population includes any individual or family who is fleeing or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. It includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit.

Limited data captured during the FY 2022 Annual Point in Time Count revealed there were 58 survivors of domestic violence, of which 24 were sheltered in emergency shelters and 29 in transitional housing. Five survivors were unsheltered. Local, up-to-date, comprehensive data on victims of domestic violence is difficult to obtain, as service providers do not use HMIS and may use different databases that must follow required privacy laws. A reliance on local data from local stakeholders regarding domestic violence is critical to identifying the need for DV survivors. Consultations revealed domestic violence as a cause for seeking services through the homeless service system.

Other Populations

HOME-ARP qualifying populations also include others who have previously qualified as homeless, are currently housed with temporary or emergency assistance, and need additional housing assistance or supportive services to avoid returning to homelessness. In addition, HUD defines those at greatest risk of housing instability as households that have an annual income less than 30% AMI and are experiencing severe cost burden or have an income less than 50% AMI and meet a specific condition, like living in someone else's home or living in a hotel due to economic hardship.

According to CHAS data, 100% of renters and 75% of homeowners with incomes less than 30% AMI are cost-burdened, meaning they use more than 30% of their income for housing-related costs.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):

The City of Rockford administers several programs through the Health and Human Services Community Services Division that include the following:

Housing Assistance Programs

- **Rapid Rehousing** – Assists persons who are literally homeless (living on the streets or in shelters).
- **Homeless Prevention** – Assists persons who have experienced a short-term crisis beyond their control with rent or mortgage assistance to remain housed.
- **Condemnation Relocation** – Assists persons whose housing has been condemned with one month's payment of rent at a new location.

Homeless Single Point of Entry

All literally homeless persons (on streets or in shelters), as well as homeless youth, veterans, and survivors of domestic violence, access housing services through the Homeless Single Point of

Entry for the homeless in the community. They are assessed for permanent housing, and a housing plan is developed.

Foster Youth Housing Assistance Program

Youth who have aged out of foster care aged 18-21 who are either homeless or having problems with housing receive support and services to help them become housed; no referral is needed. These same services are available to Department of Children & Family Services (DCFS) involved families with a referral from their caseworker.

Continuum of Care/Northern Illinois Homeless Coalition

The Northern Illinois Homeless Coalition serves as the HUD-recognized Continuum of Care, the decision-making body for homeless program coordination for the jurisdiction serving Rockford and DeKalb, Winnebago, and Boone Counties. Community Services provides support and technical assistance to the Northern Illinois Homeless Coalition. Community Services also is responsible for coordinating the application process for the HUD Continuum of Care competitive grant funding that awards funds to organizations that provide homeless services and serves as administrator of those grants. The 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

Describe the unmet housing and service needs of qualifying populations:

The needs of each qualifying population are similar, but the extent of each population's needs may depend on the circumstances of the family or individual. The identified needs underscore the need for a flexible and inclusive response system, decent and affordable housing units, and services to prevent homelessness. The sections below outline the unmet needs of each of the qualifying populations.

Homeless as defined in 24 CFR 91.5

Individuals and families enduring unsheltered homelessness are at a greater risk of continued harm living in outside spaces that are not meant for living. They have a higher rate of morbidity and mortality resulting from exposure to the elements, substance abuse, the heightening of pre-existing mental health issues, and developing or exacerbating physical health issues that can result in death. Long periods of living without shelter also put individuals and families at a greater risk of social isolation and the chance of victimization and criminalization.

Unmet Needs:

- Shelter space and housing options for youth under 25.

- Shelter staff to increase shelter capacity. The only shelter in the City is operating at 53% capacity.
- Case Management for families experiencing homelessness.

At Risk of Homelessness as defined in 24 CFR 91.5

According to most recent CHAS data, there are at least 8,270 extremely low-income renter households (under 30% AMI) with one or more severe housing problems. This population is currently housed but is also at high risk of becoming homeless due to rent increases and the lift on eviction moratoria. Any challenges, from a reduction in work hours or unemployment to health issues or loss of services, are significant risks to these individuals and households becoming homeless. These households are in most immediate need of an affordable housing unit to become stably housed, along with a range of programs and services to prevent them from becoming homeless.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Of the 406 homeless people in the 2020 PIT, 52 were also fleeing domestic violence, and this is very likely a significant undercount. Of these, five were unsheltered. Domestic Violence is a multifaceted issue that requires a well-coordinated community response that will address the immediate needs of those fleeing. This involves having immediate access to safe and stable shelter, intensive counseling, advocacy, and other supportive services, such as food, translation services for non-native-speaking persons, job training and placement services, and legal assistance. Additional short- and long-term subsidies may also be required to assist with other expenses to help stabilize individuals and families financially.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

An individual or family determined to be at risk of homelessness has an annual income below 30% of the median family income for the area. These include households that have been qualified as “homeless,” as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, and require additional housing assistance or supportive services to avoid returning to homelessness.

Although affordable housing is part of the solution, some people may require their housing needs coupled with supportive services to maintain it. For instance, service providers can help households with limited or loss of income pay their rent on time to avoid losing their housing or can make sure people who were previously homeless are housed and receiving assistance and supportive services to avoid a return to homelessness.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

Shelter

A gap in shelter capacity exists as the City only has one emergency shelter that operates at 53% capacity due to staffing shortages. There is also a gap in shelter inventory for inclusive shelters that can accommodate a wide range of household structures. Traditional shelter options may not be suitable for youth under 25 and individuals/families fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking.

Housing Inventory

There is a gap in housing inventory for quality, affordable units in Rockford for renters at the extremely low-income level. Data in Table 3: Non-Homeless Inventory and Gap Analysis show that there is a need for 3,866 units affordable for this population. Characteristics of families needing additional subsidies include youth under 25, individuals fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking, and households with incomes less than 30% AMI. Some barriers to accessing housing at this income level include extremely low income, employment, and coexisting issues (mental health, disability, age).

Service Delivery System

There is a gap in the service delivery system for coordination of services and trust in the system to run efficiently. Renters are finding it difficult to use subsidy programs due to property owners' unwillingness to accept subsidy payments and unwillingness to work with clients who have past evictions, credit challenges, or criminal history.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of "other populations" that are "At Greatest Risk of Housing Instability," as established in the HOME-ARP Notice. If including these characteristics, identify them here:

Based on stakeholder input, instability in housing is associated with the following:

- Domestic Violence, Stalking, and Sex Trafficking
- Inflation, Generational Poverty, and Lack of Livable Wages and Financial Education
- Mental Health
- Poor Condition of Housing
- Evictions
- Lack of Education
- Transient Homeless increasing burden on family and friends
- Substance abuse

- Lack of supportive services that provide clients with the tools and resources to maintain stable housing.

Identify priority needs for qualifying populations:

The City of Rockford has elected to prioritize increased housing options for domestic violence survivors and unaccompanied youth that are at risk of homelessness. Long-term objectives include supporting emergency housing and supportive services with the inclusion of the coordinated entry system. The identified projects and activities will target vulnerable individuals and families who lack the resources to independently regain stable housing. There is also a need for supportive services and increased access to affordable housing units for cost-burdened households and victims of domestic violence. Supportive services are necessary to ensure clients are connected to proper resources that will bridge the gap between emergency shelters and transitional housing to permanent housing.

Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:

Although the City of Rockford offers many emergency services to those experiencing homelessness, several gaps have been identified through reviewing available resources, conducting consultation sessions, and analyzing system needs. Gaps and needs were identified through extensive stakeholder engagement with the local CoC serving the City of Rockford area, homeless and domestic violence service providers, veterans' groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, and the needs of persons with disabilities. The level of need was determined by evaluating the number of unsheltered households and the level of resources available to adequately house the families or individuals with permanent supportive services to achieve housing stability. Ongoing coordination between the Community & Economic Development and Health and Human Services departments assisted in identifying local needs, which helped to determine how to best utilize the HOME-ARP allocation.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

The City of Rockford will publish a Request for Proposals (RFP) and any addendums through the City's Central Purchasing Department at least 10 days before the due date. The RFP will notify respondents of the City's grant allocation and funding priorities outlined in this plan. All RFPs received will undergo a fair and thorough review by a team of City staff who certify that they have no conflict of interest. Once RFPs are scored, projects are selected, and respondents are notified

through an award notice from the Community & Economic Development Department. The recommendation is then presented to the City Council to affirm the award of the contract. The Central Purchasing Department notifies respondents that were not selected.

The City will award funds to the bidder that best aligns with the needs of the RFP, ensuring that the bidders define a project that best aligns with the City's established priorities, the needs assessment, and the HOME-ARP grant program requirements. In its RFP process, the City will ensure that potential applicants are made aware that no member of the qualifying population can be limited from accessing the program. Therefore, all members of the qualifying populations will be eligible to receive services. Since consultation revealed that select segments of the qualifying population have more critical needs not addressed through traditional funding sources, the City will impose a preference by awarding additional points for proposals that prioritize assistance for:

- Persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking.
- Households that have annual income less than or equal to 30% area median income and are experiencing a severe cost burden defined as paying more than 50% of monthly household expenses toward housing costs.
- Unaccompanied youth under 25 years of age or families with children and youth, who do not otherwise qualify as homeless under this definition, but who meet one of the four following criteria:
 - (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
 - (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance.
 - (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance: or
 - (iv) Can be expected to continue in such status for an extended period because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the

presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

The Community & Economic Development Department ensures that the City of Rockford, an entitlement community, maximizes the use of its HUD funding to provide need affordable housing solutions for the City's residents.

Describe whether the PJ will administer eligible activities directly:

The City of Rockford will administer the rental housing development program and the tenant-based rental housing program directly. The supportive services program will be administered by subrecipients. Nonprofits will be able to submit proposals for HOME-ARP funds through an RFP process. The process will allow nonprofit agencies to submit proposals to assist the City in meeting the needs of the qualifying populations.

If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

The City of Rockford will not provide HOME-ARP administrative funds to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 700,000.00	19.6%	N/A
Acquisition and Development of Non-Congregate Shelters	\$ 0.00	0%	N/A
Tenant Based Rental Assistance (TBRA)	\$ 300,000.00	8.4%	N/A
Development of Affordable Rental Housing	\$ 2,042,161.00	57%	N/A
Non-Profit Operating	\$ 0.00	0%	5%
Non-Profit Capacity Building	\$ 0.00	0%	5%
Administration and Planning	\$ 536,851.00	15.0 %	15%
Total HOME ARP Allocation	\$ 3,579,012.00		

Table 5: Use of HOME-ARP Funding

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

The City of Rockford's HOME-ARP allocation of \$3,579,012.00 will be split between the costs of the development of an affordable rental housing project (\$2,042,161.00), the costs of carrying out supportive services for qualifying populations (\$700,000.00); the cost of providing tenant-based rental assistance (\$300,000.00); and administration and planning for the City (\$536,851.00). These implementation costs include funding to utilize nonprofit partners for various aspects of the program. Funds are distributed per priorities identified in this plan as described below:

Administration

The City of Rockford will use HOME-ARP administration funds to provide management and oversight of the program and to ensure compliance with HOME-ARP regulations. Rockford city staff will use 15% of its allocation for Administration.

Rental Housing

The City of Rockford will use HOME-Rental Housing funds to develop affordable housing units. Developers will be able to apply for HOME-ARP funds through an RFP process. The process will allow developers to pair HOME-ARP funds with other funding like Low-Income Housing Tax Credit (LIHTC) funds. The City will use 57% of its HOME-ARP allocation for rental housing development.

Tenant-Based Rental Assistance (TBRA)

The TBRA program will allow the City to provide rental assistance, security deposit payments, and utility deposit assistance to qualifying households. HOME-ARP funds may be used to pay for up to 100% of these eligible costs. The City will use 8.4% of its allocation for TBRA.

Supportive Services

The City of Rockford will solicit the use of subrecipients to administer supportive services. Nonprofits will be able to apply for HOME-ARP funds through an RFP process. The process will allow nonprofit agencies to submit proposals to assist the City in meeting the needs of the qualifying populations. These services include the costs of direct services provided on behalf of the client and the costs of labor (salary plus benefits), supplies, or materials incurred by the subrecipient directly providing services to program participants. The City will use 19.6% of its allocation for supportive services.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

All homeless individuals enter through the Single Point of Entry and are served by participating members of the Rockford/Dekalb, Winnebago, and Boone Counties Continuum of Care. Homeless individuals 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. During winter months, “overnight cafes” open, creating a warm place to go for those who will not or cannot access shelter services.

As listed in the City’s 2023 Annual Action Plan, the City of Rockford has reached “functional zero” for veterans and those who are chronically homeless. This means the City of Rockford 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.

Based on the 2022 Point-in-Time (PIT) Count Report for Rockford/Dekalb, Winnebago, and Boone Counties COC, there is a total of 297 homeless households, which consist of 53 unsheltered homeless persons and 21 chronically homeless persons.

The HUD 2015-2019 CHAS data identified 8,270 renter households with incomes less than 30% AMI and an additional 6,795 renter households with incomes between 30% and 50% AMI who were severely cost-burdened, which may include lacking kitchen or complete plumbing, severe overcrowding, or severe cost burden. These households are at significant risk of homelessness, and as their housing stability deteriorates, they are likely to further increase the need for additional shelter capacity. Additionally, these households are in the most immediate need of an affordable housing unit. The number of persons who are severely cost-burdened can be reduced using HOME-ARP funds to produce affordable rental housing.

The addition of HOME-ARP rental units coupled with supportive services for nonprofit organizations can assist in easing the burden of housing costs for the city’s lowest-income renters who are at high risk of housing instability and homelessness or currently experiencing homelessness and seeking opportunities for housing stability.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

The City of Rockford anticipates producing 20 units of affordable housing that will support HOME-ARP qualifying populations. This is based on new construction and may increase if the appropriate multi-unit project comes forward.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

The City of Rockford intends to develop land to create 20 units of housing to support the qualifying populations. The homes will become part of the City's rental housing program inventory and will be leased to Qualifying Populations (see page 2). The agencies will work collaboratively with organizations that provide case management and wrap-around services to the families placed in rental housing. This program addresses the priority need of the lack of rental housing for families who meet the criteria as a member of the qualifying populations.

Preferences

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

HUD defines a preference as providing a priority for selecting applicants who fall into a specific QP or category within a QP (i.e., subpopulation) to receive assistance. A preference permits an eligible applicant that qualifies for a City adopted a preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference.

The main reason people cannot access emergency shelters or other homeless assistance is that there is not enough housing or emergency shelter to inclusively accommodate every individual or family who is eligible and presents for assistance. The City needs to prioritize who receives assistance to ensure its most vulnerable citizens are stabilized in shelters, transitional housing, or permanent housing.

The City of Rockford's HOME ARP program will not exclude eligible applicants from any of the four Qualifying Populations from applying and receiving services from HOME-ARP services. However, to ensure that the needs of the city's most vulnerable clients' needs are met, the City will impose a preference under HOME-ARP for applicants who are:

- Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking.

- Households that have annual income less than or equal to 30% area median income and are experiencing a severe cost burden defined as paying more than 50% of monthly household expenses toward housing costs.
- Unaccompanied youth under 25 years of age or families with children and youth, who do not otherwise qualify as homeless under this definition, but who meet one of the four following criteria:
 - (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
 - (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance.
 - (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance.
 - (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

All clients seeking services are referred to the Homeless Single Point of Entry. The client's needs will be evaluated and prioritized during the intake process, and clients meeting the criteria in the preference category will be served first under HOME-ARP. This preference does not constitute a limitation that excludes individuals or households qualifying under the four qualifying definitions from applying for the HOME-ARP project. It does prioritize the subpopulations listed above to receive services first and all other members of the qualifying population to receive services in chronological order.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the

qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Using a preference will assist the City in addressing the critical needs of the populations identified in the previous section by providing targeted solutions for vulnerable citizens. The needs assessment revealed that survivors of domestic violence, youth under 25, and residents with income less than 30% AMI had not been prioritized in the current coordinated entry process, which prioritizes chronic homelessness. Implementing a preference for the identified groups helps the city to use limited resources in a more targeted way.

Survivors of Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

The needs assessment revealed that clients fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking have unique needs that are not prioritized under the existing coordinated entry process. Securing housing for clients who are fleeing or attempting to flee is challenging because these clients often have minimal financial resources and past evictions. Time is of the essence in assisting these families in finding new transitional or permanent housing to ensure the client's safety.

The needs assessment revealed that obtaining housing units in a relatively short timeframe (2-3 days) is difficult due to the need for a more affordable housing inventory. Service providers in Rockford also reported that property owners are hesitant to accept subsidy funding due to lengthy wait times to receive payment and perceived thoughts about clients who need assistance. Additionally, the family composition can cause challenges for clients fleeing or attempting to flee because shelter may not be available for families, thus requiring survivors to separate from their children or pets to receive services.

By prioritizing survivors fleeing or attempting to flee with HOME-ARP, the City is addressing this growing need. Using a preference for those fleeing or attempting to flee ensures that this population is prioritized for any new units developed, rental assistance, or services provided by Rockford nonprofits. It also ensures that the City can continue to support ongoing efforts that have been providing solutions and improving service delivery for survivors and property owners.

Unaccompanied Youth under 25 and Families with Youth meeting Special Criteria

The needs assessment also revealed that unaccompanied youth and families with youth meeting unique criteria are not prioritized in the current coordinated entry process. According to service providers in Rockford, this group requires more intensive case management to prepare them for adulthood. Clients in this category are often returning to homelessness and not accessing needed services because of a lack of knowledge on accessing programs, the timeframe to receive services, and existing resources not addressing the specific needs of this population.

By prioritizing youth, the City is taking an active approach to ensuring that youth who are experiencing homelessness are provided targeted services to address their unique needs. Using a preference for this group ensures that critical case management through supportive services can assist youth with essential life skills like obtaining identification, buying groceries, or making appointments. This group also benefits from rental units set aside for citizens in the priority group and subsidies for permanent housing.

Families with income less than or equal to 30% AMI and are Severely Cost Burdened

HUD defines those at greatest risk of housing instability as households that have an annual income of less than 30% AMI and are experiencing severe cost burdens. According to Comprehensive Housing Affordability Strategy (CHAS) data, 100% of renters and 75% of homeowners with incomes less than 30% AMI are cost-burdened, meaning they use more than 30% of their income for housing-related costs.

Families with extremely low incomes require additional community support and subsidies to reduce instability in housing. As the cost of housing continues to increase and the incomes of this population remain flat, the gap in housing options continues to grow. By prioritizing this group, access to newly developed housing units, subsidies for existing housing, and access to supportive services ensure that these families will begin to become stable in permanent housing.

Referral Methods

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

The City will use the Northern Illinois Homeless Coalition coordinated entry process.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

All qualifying populations eligible for a project or activity will be included in the coordinated entry process. Per the Coordinated Entry System policy, the Single Point of Entry (SPOE) will conduct an initial screening and assessment with a client to determine homeless status.

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

The City of Rockford will use the established coordinated entry process and a waiting list to prioritize services based on the preferences identified in the previous section. The current

coordinated entry prioritizes services as outlined below. The City will implement additional referral points for clients meeting the criteria outlined in the preference categories.

Each individual or family will be assessed using an initial questionnaire. In addition to the score that is received from the local preferences, which include verified residents of Winnebago/Boone/DeKalb counties for the previous 90 days will earn 20 points for a “Local Preference.” Individual applicants will be responsible for verifying residence. Verification can include a local ID (that is over 90 days old), HMIS system data, agency verification, public aid documentation, or school records for their children. If verification is not provided, they will automatically receive the points once they have been active on the list for 90 days. Chronically homeless and veterans will also receive 5 extra points (with verification). Domestic violence victims and youth (under age 24) will each receive an extra 4 points. Beginning January 1, 2019, families with children will become a priority population also. Households in this category will also receive 4 priority points when placed on the list. All individuals and families will be placed on their respective lists based on their scores and the date/time that they entered the system.

In accordance with the Housing First Model, those with the highest score will be directed to Permanent Housing options first (including supportive and non-supportive housing options), followed by Transitional Housing and Emergency Shelters. By conducting the above assessment, a score will be assigned, which will assist in determining which program type the client should be referred to.

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

In addition to using the Coordinated Entry process, the City will also use a waiting list to receive referrals from the coordinated entry process and other referring agencies. All applicants placed on the HOME-ARP waiting list are selected in chronological order.

Limitations in a HOME-ARP Rental Housing or NCS project

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV. A of the Notice:

The City of Rockford does not intend to limit eligibility for any qualifying population or any specific subpopulation for a qualifying population in a HOME-ARP rental housing or NCS project. The City recognizes that each case is different and will prioritize services to best serve those who are in the greatest need.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Not Applicable.

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

Not Applicable.

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with 24 CFR 92.206(b). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

The City of Rockford has elected not to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing to be rehabilitated with HOME-ARP funds.

- *Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity*

Not applicable

- *Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.*

Not applicable

- *State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.*

Not applicable

- *Specify the required compliance period, whether it is the minimum 15 years or longer*

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