



# City of Rockford

## 2024 Annual Action Plan

Submission Timeline	
7/8/2024	Annual Action Plan (AAP) submitted to HUD
7/29/2024	AAP re-submitted to HUD after updating AP-15, AP-20, and AP-38 narratives to include the additional \$0.40 in HOME funds.
8/8/2024	AAP re-submitted to HUD. AP-38 updates include the following: 1) Specified what the FY2024 balances were in the Administration narratives. 2) Made a Housing Development budget correction and specified what the current CHDO balances were in the narrative.

## Executive Summary

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

#### 1. Introduction

##### Response:

The City of Rockford, Illinois is an entitlement community under the U.S. Department of Housing & Urban Development's (HUD) Community Planning and Development (CPD) Programs, including 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 (City) has prepared this FY 2024 Annual Action Plan (AAP) for the period of January 1, 2024 through December 31, 2024. This AAP is the 5th year of the City's FY 2020-2024 Five Year Consolidated Plan (Con Plan). These plans are strategic plans for the implementation of the City's Federal Programs for housing, community, and economic development within the City of Rockford. The AAP establishes the City's goals for a twelve (12) month 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.

#### 2. Summarize the objectives and outcomes identified in the Plan

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

##### Response:

The 2024 Annual Action 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 twelve-month period of FY 2024:

- HS-1 Housing Development - Increases 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 - Continues 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 - Continues to assist low- and moderate-income homebuyers to purchase homes by providing direct subsidies, which include but are not limited to downpayment and closing cost assistance including housing counseling fees, interest subsidies, etc.
- HS-4 Fair Housing - Promotes fair housing choice through education, testing, training, and outreach in the City of Rockford.
- HS-5 Project Delivery - Provides eligible program delivery and oversight for the CDBG and HOME funded housing projects/activities.
- HMS-1 Housing - Supports 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 - Assists 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 - Assists the Continuum of Care's efforts in prevention of homelessness through anti-eviction activities and program for rapid re-housing.
- CDS-2 Infrastructure - Improves 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-6 Clearance/Demolition - Removes and eliminates slum and blighting conditions through clearance and demolition of vacant, abandoned, and dilapidated structures.
- EDS-2 Economic Development - Supports business and commercial growth through rehabilitation of store fronts and retail space, expansion of businesses, and the development of new businesses.
- AMS-1 Overall Coordination - Provides 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.

See AP-20 for additional details regarding Annual Goals and Objectives.

### **3. Evaluation of past performance**

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

*Response:*

The City of Rockford Community & Economic Development Department has a history of success through programs funded through the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and the Emergency Solutions Grants (ESG). Of particular importance to the health of the City have been programs that support neighborhood revitalization. The City has a strong history of successfully funded housing rehabilitation activities, which target lower income and elderly households who are unable to properly maintain their homes, as well as managing a homebuyer program that assists new homebuyers. The City continues to address blighted and vacant properties through demolition activities and leverages these programs with funds through City General Funds and grants through the Illinois Housing Development Authority. In addition, the City supports business and commercial growth primarily through the rehabilitation of commercial structures, expansion of businesses, and the development of new businesses. Although the City plans to continue with the programming as described above, the review of prior year programming and budgets revealed that COVID financial relief supplemented some programming, while other programs were slow moving. This allowed the shift of some dollars in 2024 to fund more infrastructure and housing developments, which compliments the work being done throughout the community to meet post COVID needs.

The City Department of Health and Human Services and local homeless services providers expanded the stock of units/beds 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. Upon each year’s completion, goals and strategies are re-assessed to ensure outcomes are meeting the needs of the target population. In addition, ongoing outreach allows target populations to share perspectives. This assessment helps to evaluate program performance.

Additional details of past performance can be found in the City's Consolidated Annual Performance and Evaluation Report (CAPER).



#### **4. Summary of Citizen Participation Process and consultation process**

##### **Summary from citizen participation section of plan.**

##### *Response:*

The City followed its Citizen Participation Plan by holding two (2) public hearings, each on 10/5/23. One was at noon at Katie's Cup (502 7<sup>th</sup> St) and one at 5:30 pm at Crusader Community Health (1200 W State St). Two additional public hearings were held on 11/16/23. One was at noon at the Ethnic Heritage Museum (1129 S Main St) and the other at 5:30 at the Patriots Gateway Community Center (615 S 5<sup>th</sup> St). In addition, a recorded virtual public hearing was available for public review and comment on the City's website.

To encourage citizen participation, City staff took the following steps:

- Notice for the 10/5/23 public hearings published on 9/21/23 in the Rockford Register Star;
- Notice for the 11/16/23 public hearings published on 11/1/2023 in the Rockford Register Star;
- Social Media posts, starting two weeks prior to each of the hearing dates;
- Newsletter notices sent to all residents who have signed up to be notified;
- Direct email to 106 partner agencies, inviting them to attend and post materials for the residents they serve; and
- Direct email follow-up to 106 partner agencies after the hearings with the hearing presentation attached. All recipients were invited to email comments, or schedule time to meet.
- Contacted all Alderman and offered to attend Ward meetings;
- Contacted neighborhood groups, and were scheduled to speak at a coalition meeting of neighborhood leaders in a majority minority census tract;
- Reached out to leaders of the senior communities for planning for seniors; and
- Attended several sessions with multi-family developers in the region to hear about anticipated projects and gap financing needed.

City staff also attended the 6<sup>th</sup> ward meeting on October 12<sup>th</sup>. Materials, which included comments from the 10/5 public hearing, were shared, and feedback was requested.

For proof of publication, sample of other media, proof/contingency provision for the allocation, and the City's Citizen Participation Plan, see the Citizen Participation attachment.

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

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

### *Response:*

The City of Rockford held a first set of hearings in October 2023, to provide a progress report and get community feedback before the plan was drafted. Community members asked that the City considers funding programs to build infill housing (single family, duplexes, and 4-6 unit buildings); to create more affordable rental because they were concerned about the condition of current buildings; to address the lack of options for families facing homelessness, particularly single fathers with children and families with kids 14 and over; to increase the scale and impact of home repair programs; to address need for better access to groceries and childcare in areas of the city; and to hold landlords accountable. The audiences they wanted to see primarily benefit from resources were seniors and families in crisis.

The community members also asked that the City addresses business needs in the areas that the City is completing corridor improvements, since at times that can limit access to those businesses. They also gave input on how the hearings could be marketed and made more accessible in the future.

The City held hearings in November to go over the draft plan. The City provided a summary of the comments above and gave the audience an opportunity to comment on how the input was reflected in the draft provided. The community members who attended asked clarifying questions about the regulatory restrictions on the City's home rehabilitation programs, and asked how the City would be working to get more projects done with partners. The City talked about leveraged funding and partnerships, including the Illinois Housing Development Authority (IHDA) grants and the Critical Home Repair Program with the Rockford Area Habitat for Humanity. The audience also asked questions about housing development plans, and how developers could apply for HOME funding. The City talked about the application that was available on the City's website, and what the key qualifications would be. The audience also asked for an explanation of functional zero for homelessness, and City staff gave more information on its participation in the Built for Zero community.

The City received a comment from Winnebago County Housing Authority (WCHA), saying that in previous administrations, they had participated in the CAPER reporting for the City. The Housing and Program Manager then had a follow-up meeting with WCHA to understand both the history and the potential of this type of collaboration moving forward. The City will move to including WCHA in future planning and reporting efforts.

Representatives from Credo Recovery attended the November public hearing, and then asked for a follow-up meeting with the Housing and Program Manager. They asked that the City think purposefully about single men working on addiction recovery and creating supportive housing for this audience, particularly for the single fathers. Credo then submitted a letter asking that the City work with them to create transitional housing for recovering addicts. The City will continue to work with Credo to bridge to local partners also involved in this work, and to build capacity for developing and owning transitional housing property.

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

##### *Response:*

City staff has reviewed and took into consideration all of the comments prior to finalizing this Plan. All written comments were provided responses in writing and summarized in #5 above.

#### **7. Summary**

##### *Response:*

The Annual Action Plan (AAP) 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 AAP goals to allocate CDBG, HOME, and ESG, funds over a twelve-month period (1/1/2024 through 12/31/2024) 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 AAP through the Consolidated Annual Performance and Evaluation Report (CAPER).

City staff followed the City's Citizen Participation Plan to encourage public participation. All comments were considered prior to finalizing the 2024 Annual Action Plan.

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

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

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

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
Lead Agency	Rockford, IL	
CDBG Administrator	Rockford, IL	Community and Economic Development Department
HOME Administrator	Rockford, IL	Community and Economic Development Department
ESG Administrator	Rockford, IL	Health and Human Services Department

**Table 1 – Responsible Agencies**

**Narrative (optional)**

*Response:*

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

**Consolidated Plan Public Contact Information**

*Response:*

Sarah Leys, Deputy Director

City of Rockford Community & Economic Development Department, Neighborhood Development Division, 425 E. State Street, Rockford, IL 61104, 779-348-7442, Sarah.Leys@rockfordil.gov.

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

**1. Introduction**

*Response:*

In carrying out the programs and services required in the Consolidated Planning process, the City of Rockford consults with a wide variety of government departments, governmental agencies, and private and non-profit sectors to identify and address the extensive and varied housing, community development, and social service needs of the community. Through both formal and informal relationships and activities, Rockford has sought the participation and cooperation of all affected parties in developing the 2024 Annual Action Plan. Ongoing relationships focused on specific needs and targeted meetings designed to bring public input into the Planning process are two of the ways that the City utilizes others in the consultation process. Through partnerships, limited resources are more efficiently utilized and gaps in the delivery of services are minimized. Through the planning process, the City consults with entities such as social service agencies, health services agencies, health care agencies, Continuum of Care, public housing authorities, community collaborations, private businesses, and community leaders. The following describes how government public and private agencies play a role in the planning process.

**Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))**

*Response:*

The City’s Community and Economic Development Department staff works closely with other departments on activities addressing low-and moderate- income persons and neighborhoods, leverages resources, and fills additional gaps. These departments include, but are not limited to, Legal, Public Works, Finance, and Health & Human Services Departments. The City has built partnerships with other local agencies to provide additional financial assistance when housing projects exceed program maximums. These programs can include the Winnebago County Health Department’s Lead Program and the City’s Weatherization program, run by the Health and Human Services Department. Referrals are also made to such agencies such as HUD-certified housing counseling agencies, RAMP-CIL, and Northwestern Illinois Area Agency on Aging, as appropriate. The City also has an agreement with the Winnebago County Health Department for lead inspections, if needed. This agreement allows the agencies to coordinate staff resources to provide collaborative services to the public and provides a resource to the City staff for additional lead guidance. Providers who have served as Community Housing Development Organizations in the past will be certified once projects come to

fruition. The City works with the Rockford Housing Authority who organizes resources from the federal government to address the housing needs of the City's lowest income households.

Both Public and Assisted Housing providers are active members of the Continuum of Care (CoC), as well as Crusader Clinic, the federally funded community health center, and Rosecrance, the local mental health provider. Rockford Housing Authority already provides a homeless preference point and has agreed to work with the CoC to add additional points for homeless persons coming through the Single Point of Entry System and has Emergency Housing Vouchers available to assist those with an immediate need, based on referral system through the CoC. Northern Illinois Regional Affordable Community Housing (NI ReACH) provides Moving On vouchers for people transitioning out of permanent supportive housing, Family Unification Program (FUP) vouchers for youth that have aged out of foster care, and recently received Mainstream Section Vouchers for disabled, homeless persons who are working with the City and the Single Point of Entry.

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

Response:

The Continuum of Care coordinates closely with the City of Rockford Health and Human Services Department who operates the Coordinated Entry System and manages the ESG funds. The Department is also the collaborative applicant for both CoC funds and non-federal ESG funds for the Continuum of Care. The Continuum of Care is part of the Built for Zero collaborative which trains continuums and other partners on efforts to end homelessness.

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

Response:

The CoC Board approves all policies related to HMIS and ESG. The CoC has a review committee that makes recommendation for funding of HMIS and the ESG funds. The CoC Board reviews ESG recipient performance.

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

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

1	<b>Agency/Group/Organization</b>	PRAIRIE STATE LEGAL SERVICES - ROCKFORD
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Public Comment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Organization was invited to the public hearing, and attended. Organization participates in meetings to address homelessness.
2	<b>Agency/Group/Organization</b>	NW HomeStart
	<b>Agency/Group/Organization Type</b>	Housing Neighborworks Chartered Member
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Organization was invited to the public hearing.

3	<b>Agency/Group/Organization</b>	WINNEBAGO COUNTY HEALTH DEPARTMENT
	<b>Agency/Group/Organization Type</b>	Health Agency Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Organization was invited to the public hearing. Organization participated in meetings regarding federally funded housing programs.
4	<b>Agency/Group/Organization</b>	Rockford Area Habitat for Humanity
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Organization was invited to the public hearing, and attended. Organization participated in meetings. Organization receives ARPA funding from the City to administer a Critical Home Repair program.
5	<b>Agency/Group/Organization</b>	SHELTER CARE MINISTRIES
	<b>Agency/Group/Organization Type</b>	Services-homeless Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Organization was invited to the public hearing, and attended. Organization participates in meetings to address homelessness.



6	<b>Agency/Group/Organization</b>	ROCKFORD HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Services-Elderly Persons Services-Persons with Disabilities Other government - Local Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Organization was invited to the public hearing. The City of Rockford is RHA's Responsible Entity for Environmental Review Records.
7	<b>Agency/Group/Organization</b>	Rosecrance Ware Center
	<b>Agency/Group/Organization Type</b>	Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Organization was invited to the public hearing. Organization participates in meetings to address homelessness.

8	<b>Agency/Group/Organization</b>	CARPENTERS PLACE
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Organization was invited to the public hearing. Organization participates in meetings to address homelessness.
9	<b>Agency/Group/Organization</b>	Rockford Rescue Mission
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Organization was invited to the public hearing, and attended. Organization participates in meetings to address homelessness.
10	<b>Agency/Group/Organization</b>	Crusader Community Health
	<b>Agency/Group/Organization Type</b>	Health Agency
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Organization was invited to the public hearing. Organization participates in meetings to address homelessness.

11	<b>Agency/Group/Organization</b>	NI ReACH
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Organization was invited to the public hearing. Organization participates in meetings to address homelessness.
12	<b>Agency/Group/Organization</b>	ZION DEVELOPMENT CORPORATION
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Organization was invited to the public hearing, and attended. Organization participated in meetings regarding federally funded housing programs.

13	<b>Agency/Group/Organization</b>	Veteran's Path to Hope
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Needs - Veterans Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Organization was invited to the public hearing. Organization participates in meetings to address homelessness.
14	<b>Agency/Group/Organization</b>	Small Business Development Center
	<b>Agency/Group/Organization Type</b>	Services-Education Services-Employment Regional organization Planning organization Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Organization was invited to the public hearing.

15	<b>Agency/Group/Organization</b>	COMPREHENSIVE COMMUNITY SOLUTIONS
	<b>Agency/Group/Organization Type</b>	Housing Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Organization was invited to the public hearing.
16	<b>Agency/Group/Organization</b>	Region 1 Planning Council/Northern Illinois Land Bank
	<b>Agency/Group/Organization Type</b>	Regional organization Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Organization was invited to the public hearing. Organization participated in meetings regarding federally funded housing programs.

17	<b>Agency/Group/Organization</b>	Rockford Housing Development Corporation
	<b>Agency/Group/Organization Type</b>	Housing Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Organization was invited to the public hearing. Organization works directly with City staff on outreach to its focus area neighborhoods regarding its planned development. Organization recently launch the Rockford Community Investment Fund (a CDFI), and originates loans to contractors working on acquisition/rehab.
18	<b>Agency/Group/Organization</b>	The Salvation Army of Rockford & Winnebago County
	<b>Agency/Group/Organization Type</b>	Services-homeless Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education Agency – Emergency Management
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs – Chronically homeless Homeless Needs – Families with children Homelessness Needs – veterans Homelessness Needs – Unaccompanied youth Homelessness Strategy HOPWA Strategy Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Organization was invited to the public hearing. Organization participates in meetings to address homelessness.
19	<b>Agency/Group/Organization</b>	RAMP-CIL
	<b>Agency/Group/Organization Type</b>	Housing Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Organization was invited to the public hearing.

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

*Response:*

The City of Rockford Fire Department is primarily responsible for disaster management/planning in conjunction with the Winnebago County Health Department. Plans are funded through other means and staff is aware to contact Community & Economic Development staff should additional funds be needed.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Northern Illinois Homeless Coalition	The Strategic Plan identifies 6 Priority Needs, including Homeless. This need is supported by the NIHC and its participating agencies.
PHA 5 Year Plan	Rockford Housing Authority (RHA)	The Strategic Plan identifies 6 Priority Needs, including Housing, Homeless, and Economic Development. The RHA 5 Year Plan provides resources for housing, as well as programs for resident education and employment training.
Neighborhood Revitalization Strategy Area (NRSA)	City of Rockford	The Strategic Plan identifies 6 Priority Needs, including Housing, Community Development and Economic Development. Strategies developed in the NRSA will support these needs.
2020 Analysis of Impediments to Fair Housing Choice	City of Rockford	The 2020 AI was completed as part of the 2020-2024 Consolidated Plan. This plan identifies impediments to fair housing in the community, as well as goals and strategies to address those impediments.
NRN Neighborhood Revitalization Strategy	City of Rockford	The Strategic Plan identifies 6 Priority Needs, including Housing and Community Development. Through this NRN plan, a neighborhood typology has been developed that provides a data-driven framework for policy and program decision making. It also helps to develop strategies to implement neighborhood improvements.
2040 Comprehensive Plan	City of Rockford	The City of Rockford 2040 Comprehensive Plan provides a vision for the future of Rockford, focusing on City policies and strategies to guide the physical development of the City.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

N/A



## **AP-12 Participation – 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation**

#### **Summarize citizen participation process and how it impacted goal-setting**

##### *Response:*

The City of Rockford continues to honor the procedures outlined in the attached City's Citizen's Participation Plan. Therefore, City staff held two sets of public hearings, one set to give an overview of the HUD funding sources, go through the City's progress meeting goals last year, and request public comment regarding funding needs for 2024 Annual Action Plan (AAP) and the other to present the 2024 AAP goals and budget for CDBG, HOME, and ESG, and to invite participants to comment on the draft plan.

City staff held the first two (2) public hearings, each on 10/5/23; one at noon at Katie's Cup (502 7<sup>th</sup> St) and one at 5:30 pm at Crusader Community Health (1200 W State St). The two (2) additional public hearings were held on 11/16/23; one at noon at the Ethnic Heritage Museum (1129 S Main St) and the other at 5:30 at the Patriots Gateway Community Center (615 S 5<sup>th</sup> St).

The Public Notice for the 10/5/23 public hearings was published in the Rockford Register Star on 9/21/23. In addition to the publications, 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 Public Notice for the two (2) additional public hearings was published in the Rockford Register Star on 11/16/23 and the release of the proposed draft of the 2024 Annual Action Plan for review and comment was published in the Rockford Register Star on 11/1/2023 and 11/8/2023. The required 30-day public comment period is from 11/2/23 through 12/4/23.

A draft of the proposed 2024 AAP was 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.

To encourage citizen participation, City staff took the following steps:

- Contacted all Alderman and offered to attend Ward meetings;
- Contacted neighborhood groups, and were scheduled to speak at a coalition meeting of neighborhood leaders in a majority minority census tract;
- Social Media posts, starting two weeks prior to each of the hearing dates;
- Newsletter notices sent to all residents who have signed up to be notified;
- Direct email to 106 partner agencies, inviting them to attend and post materials for the residents they serve; and
- Direct email follow-up to 106 partner agencies after the hearings with the hearing presentation attached. All recipients were invited to email comments, or schedule time to meet.
- Reached out to leaders of the senior communities for planning for seniors; and
- Attended several sessions with multi-family developers in the region to hear about anticipated projects and gap financing needed.

City staff also attended the 6<sup>th</sup> ward meeting on October 12<sup>th</sup>. Materials, which included comments from the 10/5 public hearing, were shared, and feedback was requested. Notification of this meeting was provided to the Rockford Register Star, Rock River Times, WIFR News, WREX News, WTOV, WNII, and Rock River Current.

For proof of publication, sample of other media, proof/contingency provision for the allocation, and the City's Citizen Participation Plan, see Citizen Participation attachment.

## Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing 10/5/2023 @ noon	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Neighborhood Groups and Leaders</p>	14 Attendees	See AP-05 # 5.	<p>City staff has reviewed and took into consideration all of the comments prior to finalizing this Plan. All written comments were provided responses in writing and summarized in Section AP-05 #5.</p>	NA

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 Hearing 10/5/2023 @ 5:30pm	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Neighborhood Groups and Leaders</p>	10 Attendees	See AP-05 # 5.	<p>City staff has reviewed and took into consideration all of the comments prior to finalizing this Plan. All written comments were provided responses in writing and summarized in Section AP-05 #5.</p>	NA

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	Public Hearing 11/16/2023 @ noon	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Neighborhood Groups and Leaders</p>	4 Attendees	See AP-05 # 5.	<p>City staff has reviewed and took into consideration all of the comments prior to finalizing this Plan. All written comments were provided responses in writing and summarized in Section AP-05 #5.</p>	NA

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	Public Hearing 11/16/2023 @ 5:30pm	<p>Minorities</p> <p>Non-English Speaking – Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Neighborhood Groups and Leaders</p>	0 Attendees	NA	NA	NA

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	Recorded Virtual Public Hearing	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Neighborhood Groups and Leaders</p>	10 views	See AP-05 # 5.	<p>City staff has reviewed and took into consideration all of the comments prior to finalizing this Plan. All written comments were provided responses in writing and summarized in Section AP-05 #5.</p>	<p><a href="https://www.youtube.com/watch?v=7w3JyIHhsYc">https://www.youtube.com/watch?v=7w3JyIHhsYc</a></p>

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

##### Response:

The City's program year is from January 1, 2024 to December 31, 2024. The funds described below will be used to address the following priority needs: Housing; Homeless; Other Special Needs; Community Development; Economic Development; and Administration, Planning, and Management.

The Department of Housing and Urban Development (HUD) allocated to the City of Rockford \$2,219,358 in CDBG funds, \$928,634.40 in HOME funds, and \$192,497 in ESG funds for the 2024 program year. See Table 5. The total "Expected Amount Available" includes these allocations, prior year funding, and program income (PI).

The City is required to budget any HOME PI received during 2023 in the 2024 budget. However, none was received. Although this is the case, the City did receive HOME PI in earlier years, which are still available and included within the prior year resources total in Table 5 below. The City does not anticipate a significant amount of CDBG (PI). Should the City receive CDBG PI the City will utilize CDBG PI prior to any entitlement



dollars. Therefore, any CDBG project/activity could be funded with CDBG PI.

The FY 2024 Consolidated Annual Performance & Evaluation Report (CAPER) will detail the accomplishments of these projects/activities.

See “Discussion” within this section for additional details.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 5				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$2,219,358	\$2,000	\$1,932,893	\$4,154,251	0	7 Projects/activities were based on the FY 2024 and prior year CDBG allocations.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 5				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$928,634	\$0	\$3,801,398	\$4,730,032	0	5 Projects/activities were based on the FY 2024 and prior year 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	\$192,497	\$0	\$200,978	\$393,475	0	1 Project/activity was based on the FY 2024 ESG allocations and prior year allocations.

**Table 5 - Expected Resources – Priority Table**

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

*Response:*

The City's Community & Economic Development and Health & Human Services Department 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
- Department of Commerce & Economic Development - Community Services Block Grant
- Department of Commerce & Economic Development – Low income home emergency assistance Program
- Department of Housing and Urban Development Continuum of Care-Homeless Assistance
- 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:

- Community Solutions – private foundation funds for the housing and wrap-around services needed to house severely mentally ill homeless persons.
- Winnebago County Mental Health Board (WCMHB) —private foundation funding for services for severely mentally ill and unsheltered persons
- Housing rehabilitation - If the cost of rehabilitation exceeds the City's program maximums, property owners invest their own funds, obtain available grants from local agencies or seek loans from a financial institution.
- Homeownership assistance 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.

- The City can supplement housing rehabilitation programs with other competitive grants through the Federal Home Loan Bank of Chicago (FHLBC). 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 homeowner rehab programs, including a \$400,000 award under the Home Repair and Accessibility Program (HRAP) and a \$1,425,000 award under the Homeowner Assistance Fund Home Repair (HAFHR) Program. The City is using the HRAP funding to complete accessibility and home repair projects costing up to \$45,000 per property, and expects to complete 7 projects in 2024. The HAFHR program funding has just been recently awarded, and will be used to complete 30 homeowner rehab projects of up to \$60,000 each.

In addition, IHDA has a homeownership program that provides first mortgage financing and down payment assistance. These funds are provided to homebuyers through financial institutions approved by IHDA.

#### Local:

Some local organizations with compatible programs and/or other local funding sources include, but are not limited to, the following:

- Community Action Agency Weatherization
- Winnebago County Health Department
- Rockford Area Habitat for Humanity (Habitat)
- LifeScape/Northern Illinois Area Agency on Aging
- The Community Foundation of Northern Illinois
- Tax Increment Financing Districts
- Resources available for the City's Public Works Capital Improvement Plan

#### HOME and ESG Match Requirements:

The City's HOME match requirement of 25% has been met; 2023 CAPER reported an excess amount of \$1,117,948. 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 improvement completed in the area.

The City anticipates that it will have ESG match of \$190,389 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**

*Response:*

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. The City uses CDBG and other state/local funds to support a demolition program aimed at reducing conditions of slum and blight in neighborhoods throughout the community. There is no intent to acquire properties through this program unless the acquisition best serves the neighborhood. The City will work with non-profit housing providers and CHDOs to redirect vacant lots created by the demolition program for use for affordable housing and with adjacent property owners to acquire as a side-lot. In early 2019, the City of Rockford signed an intergovernmental agreement with Belvidere, Winnebago, and Boone Counties to establish the Northern Illinois Land Bank Authority. The board of trustees for the land bank has established strategies for land acquisition and disposition.

**Discussion**

*Response:*

Additional local policy and programming details:

1. The Annual Action Plan (AAP) budget that was reviewed and commented on by the public was based on 2023 funding allocations, anticipated program income, and anticipated 2023 year-end balances that would be available during 2024. Adjustments were made once year-end balances were finalized and actual allocations were announced by the Department of Housing and Urban Development (HUD).
2. Any increases or decreases in CDBG and/or HOME funds were be applied to projects in need or slow moving, respectively. None of the increases or decreases of funding were substantial and therefore, the City was not required to seek public comment prior to submitting this AAP to HUD.
3. The City is prepared to incur pre-award costs for the 2024 funds.
4. Any CHDO operating dollars that were not requested or committed by the end of the calendar year were automatically moved to the HOME Housing Development Project.

## 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 CDBG Eligible Areas NRSA	Housing Strategy	HOME: \$3,387,041	Rental units rehabilitated: 14 Household Housing Unit Homeowner Housing Added: 4 Household Housing Unit Other: 1 Other
2	HS-2 Housing Rehabilitation	2020	2024	Affordable Housing	City Wide CDBG Eligible Areas NRSA	Housing Strategy	CDBG: \$644,501  HOME: \$600,000	Homeowner Housing Rehabilitated: 53 Household Housing Unit
3	HS-3 Homeownership	2020	2024	Affordable Housing	City Wide CDBG Eligible Areas NRSA	Housing Strategy	HOME: \$432,902	Direct Financial Assistance to Homebuyers: 28 Households Assisted
4	HS-4 Fair Housing	2020	2024	Affordable Housing	City Wide CDBG Eligible Areas NRSA	Housing Strategy	CDBG: \$50,000	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 NRSA	Housing Strategy	CDBG: \$487,259	Rental units rehabilitated: 14 Household Housing Unit Homeowner Housing Rehabilitated: 10 Household Housing Unit Homeowner Housing Added: 4 Household Housing Unit Direct Financial Assistance to Homebuyers: 28 Households Assisted Other: 1 Other
6	HMS-1 Housing	2020	2024	Homeless	City Wide	Homeless Strategy	ESG: \$30,000	Other: 2 Other
7	HMS-2 Operation/Support	2020	2024	Homeless	City Wide	Homeless Strategy	ESG: \$154,000	Other: 4 Other
8	HMS-3 Prevention and Re-Housing	2020	2024	Homeless	City Wide	Homeless Strategy	ESG: \$181,076	Other: 2 Other
17	CDS-6 Clearance/Demolition	2020	2024	Non-Housing Community Development	City Wide CDBG Eligible Areas NRSA	Community Development Strategy	CDBG: \$905,456	Buildings Demolished: 35 Buildings



Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
21	EDS-2 Development	2020	2024	Economic Development	City Wide CDBG Eligible Areas NRSA	Economic Development Strategy	CDBG: \$610,691	Businesses assisted: 24 Businesses Assisted
24	AMS-1 Overall Coordination	2020	2024	Administration, Planning, and Management	City Wide CDBG Eligible Areas NRSA	Administration, Planning, and Management Strategy	CDBG: \$756,344 HOME: \$310,089 ESG: \$28,399	Other: 3 Other
25	CDS-2 Infrastructure	2020	2024	Non-Housing Community Development	City Wide CDBG Eligible Areas NRSA	Community Development Strategy	CDBG: \$700,000	Other: 1 Other

**Table 6 – 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	<b>Goal Name</b>	HS-3 Homeownership
	<b>Goal Description</b>	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	<b>Goal Name</b>	HS-4 Fair Housing
	<b>Goal Description</b>	Promote fair housing choice through education, testing, training, and outreach in the City of Rockford.
5	<b>Goal Name</b>	HS-5 Project Delivery
	<b>Goal Description</b>	Provide eligible program delivery and oversight for the CDBG and HOME funded housing projects/activities.
6	<b>Goal Name</b>	HMS-1 Housing
	<b>Goal Description</b>	Support the Continuum of Care's efforts and applicants to provide emergency shelter, transitional housing, permanent supportive housing, and other permanent housing opportunities.
7	<b>Goal Name</b>	HMS-2 Operation/Support
	<b>Goal Description</b>	Assist providers who operate housing or provide support services for the homeless and persons or families at-risk of becoming homeless.
8	<b>Goal Name</b>	HMS-3 Prevention and Re-Housing
	<b>Goal Description</b>	Assist the Continuum of Care's efforts in prevention of homelessness through anti-eviction activities and program for rapid re-housing.
17	<b>Goal Name</b>	CDS-6 Clearance/Demolition
	<b>Goal Description</b>	Remove and eliminate slum and blighting conditions through clearance and demolition of vacant, abandoned, and dilapidated structures.
21	<b>Goal Name</b>	EDS-2 Development
	<b>Goal Description</b>	Support business and commercial growth through rehabilitation of store fronts and retail space, expansion of businesses, and the development of new businesses.

24	<b>Goal Name</b>	AMS-1 Overall Coordination
	<b>Goal 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.
25	<b>Goal Name</b>	CDS-2 Infrastructure
	<b>Goal Description</b>	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.

**Table 7 – Goal Descriptions**

**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 91.215(b)**

The City's total HOME budget of \$4,730,032.40 (2024 allocation and prior year funds) will assist approximately fifty-six (56) households with incomes at or below eighty percent (80%) of Area Median Income. See Table 6, which details how the HOME funds (minus the cents) were budgeted by goal and the number of anticipated households assisted for each of those goals.

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

#### Response:

The City of Rockford proposes to undertake the project types below with the FY 2024 CDBG, HOME, and ESG, funds. The Project Summary Table details how all of the 2024 funds (minus any cents) were budgeted by project and the number of anticipated units of measurement (household, jobs, etc.) were assisted for each of those projects.

#### Projects

#	Project Name
1	Administration
2	Project Delivery
3	Housing Rehabilitation
4	Fair Housing
5	Clearance/Demolition
6	Economic Development
7	Homeownership
8	Housing Development
9	CHDO Operating
10	ESG23 Rockford
11	Infrastructure

**Table 8 - Project Information**

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

*Response:*

In addition to considering feedback from the community, as described in this document, the City considers the following when developing a budget:

- Per regulation, at least 70% of the CDBG entitlement expenditures must benefit low/mod income (LMI) persons. This may occur through directly assisting LMI households and/or benefitting LMI persons through an area benefit.
- All of HOME and ESG program funds (except for 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.
- Local and regional plans, strategies, and initiatives (i.e. the 2020-2024 Consolidated Plan, NRSA, the 2040 Comprehensive Plan, the National Resource Network (NRN) Neighborhood Revitalization Strategy, the Capital Improvement Plan, etc.).
- The capacity of staff and partners.
- Level of need and resources available to meet those needs.
- Ability to leverage resources to provide the greatest return on investment.
- Federal expenditure requirements.

The LMI National Objective is met by the following:

- Ensuring all CDBG funded housing beneficiaries meet the definition of LMI, or when located in the NRSA, 51% of the beneficiaries are LMI.
- The City will identify an infrastructure project within a service area that was determined to have more than 51% LMI households. This project will be consistent with the City's Capital Improvement Plan, but not accomplished without the CDBG commitment.
- Most Economic Development projects will either serve LMI areas by census tract or block group, be located in a census tract or block group and 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 LMI individuals or assist a LMI microenterprise development.

The Aid in the prevention/elimination of slums/blight National Objective is met by demolition activities, which do not count toward the 70% low/mod income requirement.

Administration & Planning dollars, Fair Housing, and Section 108 cannot count toward the 70% low/mod income requirement.

Priority Needs (Housing, Homeless, Other Special Needs, Community Development, Economic Development, and Administration, Planning and Management) must be designated as High or Low Priority. High Priority Needs are expected to be funded during FY2024, while Low Priority Needs may not. All are ranked High Priority, except for Other Special Needs. Other Special Needs projects may be supported by other means, if consistent with the 2020-2024 Five-Year Consolidated Plan.

There are several obstacles to addressing underserved needs in Rockford. The first is aging housing stock located in Rockford, with 78% of homes having been built before 1978. 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 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 combination of those two long standing issues with the recent supply chain problems and price hikes means that projects take longer and cost more. Another obstacle is that most of the City's rehab projects will require lead licensed contractors, which are limited in supply and in high demand for other housing programs in the region.

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

<b>1</b>	<b>Project Name</b>	Administration
	<b>Target Area</b>	City Wide CDBG Eligible Areas NRSA
	<b>Goals Supported</b>	AMS-1 Overall Coordination
	<b>Needs Addressed</b>	Administration, Planning, and Management Strategy
	<b>Funding</b>	CDBG: \$756,344 HOME: \$310,089
	<b>Description</b>	\$756,344 in CDBG and \$310,089.40 in HOME funds will 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.
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2 other

	<b>Location Description</b>	CDBG Eligible Areas - Local Target area City Wide - Other NRSA - Strategy area
	<b>Planned Activities</b>	Administration of Federal, State, and locally funded programs, including all necessary compliance, planning, reviews, and reports. Of the \$756,344 in CDBG funds budgeted for administration, \$443,871.60 is FY 2024 funds, and the rest are prior year funds. The City does intend to utilize 20% of the CDBG Program Income received throughout the year for administration, as well. Of the \$310,089.40 of HOME funds budgeted for administration, \$92,863.40 is FY 2024 funds, and the rest are prior year funds. No PI was set aside for administration.
2	<b>Project Name</b>	Project Delivery
	<b>Target Area</b>	City Wide CDBG Eligible Areas NRSA
	<b>Goals Supported</b>	HS-5 Project Delivery
	<b>Needs Addressed</b>	Housing Strategy
	<b>Funding</b>	CDBG: \$487,259
	<b>Description</b>	Provide eligible program delivery and oversight for the CDBG and HOME funded housing projects/activities.
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	28 Household Housing Units 28 Households Assisted 1 other



	<b>Location Description</b>	CDBG Eligible Areas - Local Target area City Wide - Other NRSA - Strategy area
	<b>Planned Activities</b>	Project delivery to support the following HOME-funded activities: homeownership (28 units), affordable housing (28 units), and CHDO Operating (1 other).
<b>3</b>	<b>Project Name</b>	Housing Rehabilitation
	<b>Target Area</b>	City Wide CDBG Eligible Areas NRSA
	<b>Goals Supported</b>	HS-2 Housing Rehabilitation
	<b>Needs Addressed</b>	Housing Strategy
	<b>Funding</b>	CDBG: \$644,501 HOME: \$600,000
	<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>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	53 Household Housing Units
	<b>Location Description</b>	CDBG Eligible Areas - Local Target area City Wide - Other NRSA - Strategy area

	<b>Planned Activities</b>	Housing rehabilitation assistance for owners to address properties occupied by owners and renters (53 Homeowner Housing units rehabilitated).
<b>4</b>	<b>Project Name</b>	Fair Housing
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	HS-4 Fair Housing
	<b>Needs Addressed</b>	Housing Strategy
	<b>Funding</b>	CDBG: \$50,000
	<b>Description</b>	Promote fair housing choice through education, testing, training, and outreach in the City of Rockford.
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	5 other
	<b>Location Description</b>	City Wide
	<b>Planned Activities</b>	Provide education, testing, training, and outreach regarding Fair Housing topics.
<b>5</b>	<b>Project Name</b>	Clearance/Demolition
	<b>Target Area</b>	City Wide CDBG Eligible Areas NRSA
	<b>Goals Supported</b>	CDS-6 Clearance/Demolition
	<b>Needs Addressed</b>	Community Development Strategy
	<b>Funding</b>	CDBG: \$905,456

	<b>Description</b>	Remove and eliminate slum and blighting conditions through clearance and demolition of vacant, abandoned, blighted, and dilapidated structures.
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	35 Buildings
	<b>Location Description</b>	CDBG Eligible Areas - Local Target area City Wide - Other NRSA - Strategy area
	<b>Planned Activities</b>	Clearance, demolition, removal of vacant and blighted structures, and improvements for properties that are not suitable for rehabilitation (35 buildings).
6	<b>Project Name</b>	Economic Development
	<b>Target Area</b>	City Wide CDBG Eligible Areas NRSA
	<b>Goals Supported</b>	EDS-2 Development
	<b>Needs Addressed</b>	Economic Development Strategy
	<b>Funding</b>	CDBG: \$610,691
	<b>Description</b>	Support business and commercial growth through rehabilitation of store fronts and retail space, expansion of businesses, and the development of new businesses.
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	24 businesses

	<b>Location Description</b>	CDBG Eligible Areas - Local Target area City Wide - Other NRSA - Strategy area
	<b>Planned Activities</b>	Assistance for qualified expenses for development of commercial or industrial property, including design work, mechanical systems, building materials, site readiness, and equipment. Expands microenterprise loan program. (24 businesses)
<b>7</b>	<b>Project Name</b>	Homeownership
	<b>Target Area</b>	City Wide CDBG Eligible Areas NRSA
	<b>Goals Supported</b>	HS-3 Homeownership
	<b>Needs Addressed</b>	Housing Strategy
	<b>Funding</b>	HOME: \$432,902
	<b>Description</b>	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.
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	28 Households Assisted
	<b>Location Description</b>	CDBG Eligible Areas - Local Target area City Wide - Other NRSA - Strategy area

	<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. (28 units)
<b>8</b>	<b>Project Name</b>	Housing Development
	<b>Target Area</b>	City Wide CDBG Eligible Areas NRSA
	<b>Goals Supported</b>	HS-1 Housing Development
	<b>Needs Addressed</b>	Housing Strategy
	<b>Funding</b>	HOME: \$3,340,609
	<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>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	18 Household Housing Units
	<b>Location Description</b>	CDBG Eligible Areas - Local Target area City Wide - Other NRSA - Strategy area

	<b>Planned Activities</b>	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. This includes Community Housing Development Organization (CHDO) projects. Currently there are three (3) years (2021-2023) of CHDO Reserves/set aside totaling \$480,578.10 available. That along with the 2024 allocation of \$139,295.10, the City has a total of \$619,873.20 available for CHDO developments. (14 Rental units rehabilitated and 4 Homeowner Housing Added)
9	<b>Project Name</b>	CHDO Operating
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	HS-1 Housing Development
	<b>Needs Addressed</b>	Housing Strategy
	<b>Funding</b>	HOME: \$46,432
	<b>Description</b>	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.
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1 other
	<b>Location Description</b>	City Wide
	<b>Planned Activities</b>	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.

10	<b>Project Name</b>	ESG24 Rockford
	<b>Target Area</b>	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: \$393,475
	<b>Description</b>	Housing: Support the Continuum of Care's (CoC) efforts and applicants to provide emergency shelter, transitional housing, permanent supportive housing, and other permanent housing opportunities. Operation/Support: Assist providers who operate housing or provide support services for the homeless and persons or families at-risk of becoming homeless. Prevention and Re-housing: Assist the CoC's efforts in prevention of homelessness through anti-eviction activities and program for rapid re-housing. Administration: Provide program management and oversight for the successful administration of the program. Administration is capped at 7.5% of the grant.
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	9 other
	<b>Location Description</b>	City Wide
	<b>Planned Activities</b>	Housing (\$30,000), Operation/Support (\$154,000), Prevention and Rehousing (\$181,076), and Administration (\$28,299). Of the \$28,299 budgeted for administration, \$14,437 is FY 2024 funds. The remainder of funds budgeted for administration are from prior years.

11	<b>Project Name</b>	Infrastructure
	<b>Target Area</b>	City Wide CDBG Eligible Areas
	<b>Goals Supported</b>	CDS-2 Infrastructure
	<b>Needs Addressed</b>	Community Development Strategy
	<b>Funding</b>	CDBG: \$700,000
	<b>Description</b>	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.
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1 other
	<b>Location Description</b>	CDBG Eligible Areas - Local Target area City Wide - Other
	<b>Planned Activities</b>	Reconstruction projects including but not limited to new asphalt pavement, storm sewer system, curb and gutter, sidewalk facilities, upgraded bicycle level of service, handicap accessibility improvements/removal of architectural barriers, and flood drainage improvements.



**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**

*Response:*

The 2016-2020 American Community Survey 5-Year Estimates were used to develop the City’s 2024 CDBG Low-to-Moderate Income (LMI) map. (See attached map found in the Grantees Unique Appendices.) Much of the funding from the CDBG and HOME programs is available for use in CDBG neighborhoods or city-wide, depending on the specifics of the designated activities. Also, some funding is available as a direct individual benefit, rather than an area benefit. In 2020, the City created a NRSA to provide additional flexibilities with the administration of its CDBG funding. The City will continue to provide specific programming for the NRSA area and seek additional resources. In 2023, the City received its third award of funding under the Illinois Housing Development Authority (IHDA) Strong Communities Program (SCP), and that \$125,000 will be used to support the City’s demolition program in 2024.

**Geographic Distribution**

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

**Table 10 - Geographic Distribution**

**Rationale for the priorities for allocating investments geographically**

*Response:*

The AP-38 Project Summary includes "City Wide" as a “Location Description” 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, including Public Works, invest in these same low/moderate income census tracts.

As part of the 2020-2024 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. The City intends to strategically invest dollars in the NRSA, which includes 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, and 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**

### *Response:*

Based on the U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates, there are seven census tracts in the City with minority populations of 50% or more. These areas include census tracts 10, 12, 24, 25, 26, 31 and 32. The City's approved NRSA includes block groups which are located in census tracts 10 and 12.

## Affordable Housing

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

#### Introduction

#### Response:

The City of Rockford will utilize its CDBG, HOME, and ESG funds to increase the number of affordable housing units, 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 2024 are as follows:

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	56
Special-Needs	0
Total	56

**Table 11 - 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	4
Rehab of Existing Units	24
Acquisition of Existing Units	28
Total	56

**Table 12 - One Year Goals for Affordable Housing by Support Type**

## Discussion

### Response:

The tables above include HOME funded affordable housing goals. The City budgeted CDBG and ESG funds for affordable housing projects, as well. See CDBG and ESG goals below.

- **CDBG Housing Rehabilitation:** Housing rehabilitation assistance for owners to address properties occupied by owners and renters (43 Rehab of Existing Units).
- **Emergency Solutions Grant:** Through essential services, operating/rehab of emergency shelters, and homeless prevention/rapid rehousing, 300 homeless households will receive support, and 75 households will receive rental assistance.

In addition, the City will assist thirty-seven (37) owner-occupants of single family housing using Illinois Housing Development Authority (IHDA) funds. Seven (7) utilize IHDA Home Repair and Accessibility Program (HRAP) funds to ensure properties are accessible for household members who are elderly (62+) and/or have a physical and/or mental impairment, which substantially limits 1 or more of the person's major life activities such as caring for one's self, bending, performing manual tasks, walking, etc. The other thirty (30) utilize IHDA Homeowner Assistance Fund HOME Repair (HAFHR) Program funds to ensure housing meets IHDA property standards and local code.

Additional discussion regarding HOME affordable housing and the tables above: The Federal HOME program can fund a wide range of activities including building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-income people. It is designed exclusively to create affordable housing for low-income households. Developers, homeowners, and homebuyers have access to program details and applications on the City's website when the City is accepting applications. Generally, as funding is available, City staff accepts developer applications and/or solicits for affordable housing projects using requests of proposals through the City's purchasing department. The City uses a first-come first-serve or lottery application process when accepting applications from homeowners and/or homebuyers seeking assistance.

In addition to marketing programs on the City's website, information is available at City Hall in the Community & Economic Development Department. City staff often uses social media, local newspapers, neighborhood groups, and community events to spread the word about

programming, as well.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

#### *Response:*

The Rockford Housing Authority (RHA) is dedicated to serving the Rockford community by offering secure, quality, and affordable housing options for low-income city residents. As part of our strategic planning process, we have refined our mission and vision to center on resident empowerment, achieved through education, training, and employment opportunities.

#### **Our Mission:**

RHA's mission is to forge strategic partnerships with community stakeholders, cultivate a diverse housing portfolio, and harness the potential of social service programs to unite and provide residents with a secure and nurturing environment that fosters self-sufficiency, responsibility, and individual empowerment.

#### **Our Vision:**

RHA's vision is to create pathways for individuals to enhance their quality of life through inclusive, affordable, and innovative housing initiatives. We are committed to investing in the education, training, and personal development of our residents through strategic programming and partnerships. Simultaneously, we serve as facilitators for neighborhood restoration by investing in our community and maintaining our commitment to fostering an environment that promotes overall health, wellness, and economic growth, thus ensuring a higher quality of life for all.

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

#### *Response:*

The Rockford Housing Authority (RHA) has outlined a series of objectives and initiatives aimed at enhancing resident involvement, self-sufficiency, and overall quality of life. These initiatives are designed to empower RHA residents and strengthen community bonds. They include:

1. Housing Occupants Mobilization Effort (HOME): HOME is a resident-elected organization that collaborates with Resident Leadership Councils

(RLCs) and RHA to address issues affecting public housing residents' quality of life. It serves as a governing body for RLCs and works in partnership with RHA staff to ensure compliance with HUD guidelines.

2. Resident Leadership Councils (RLCs): RLCs act as tenant organizations for RHA-managed properties. They advocate for residents' needs, evaluate living conditions, encourage self-sufficiency, and promote good relationships between residents, HOME/RAB, and RHA staff.

3. RHA Family Self-Sufficiency (FSS): RHA encourages residents to participate in the FSS program, offering four different paths to self-sufficiency.

4. Life Force Development Institute (LDI): RHA has developed an educational platform called LDI, offering a 12-week program focusing on personal development, financial wellness, and social skills to empower residents and improve their quality of life.

5. Special Programs and Initiatives: RHA offers various programs, such as ConnectHome, New Mix & Craft Entrepreneurship, and Resident Leadership Council, to provide residents with additional opportunities and support.

6. Resident Opportunities for Self-Sufficiency (ROSS): ROSS works with residents to create individualized work plans related to employment and education, aiming to reduce or eliminate subsidy assistance through supportive services and resources.

7. Jobs Plus: This program provides education, training, and job placement opportunities for residents, allowing them to retain surplus income through the Jobs Plus Earned Income Disallowance (JPEID) and improve their financial stability.

8. Section III: RHA is a leader in implementing Section 3, providing economic opportunities, apprenticeships, and job placements for Section 3 residents and businesses in compliance with HUD guidelines.

9. Housing Choice Voucher (HCV): RHA serves over 1,700 families through the HCV program, including a Home Ownership program for 12 residents. The agency also aims to incentivize private landlords to participate in the HCV program.

10. Moving To Work (MTW) Designation: RHA has been granted the MTW designation by HUD, enabling us to implement enhancements such as elevated rent payment standards, property damage coverage, and signing bonuses for landlords. These initiatives aim to diversify housing

options within the HCV program, benefiting program participants.

Furthermore, RHA has established a vital role known as the "Landlord Liaison." This position serves as a bridge between landlords and program participants. The Landlord Liaison's responsibilities include curating and maintaining a comprehensive "Landlord Unit Listing." This resource equips active participants with knowledge about available housing options, reducing their search time. Additionally, it ensures that landlords are well-informed about inspection criteria and standards, fostering better understanding and cooperation between all parties involved.

11. Repositioning of assets. RHA is actively identifying Public Housing Units for potential repositioning and disposition. We are diligently reviewing a range of available options, each with its distinct planning considerations, as we contemplate the long-term future of the RHA Housing Portfolio.

These initiatives reflect RHA's commitment to empowering residents, improving their quality of life, and fostering strong community relationships.

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

*Response:*

The Rockford Housing Authority (RHA) offers multiple avenues for resident involvement, fostering community empowerment and self-sufficiency. These opportunities include:

1. Housing Occupants Mobilization Effort (HOME): HOME is an organization comprised of RHA residents elected from Resident Leadership Councils (RLCs). It collaborates with RHA to address issues affecting public housing residents' quality of life. HOME/RAB, in partnership with RHA staff, assists RLCs and residents with organization and functioning while ensuring compliance with HUD guidelines.
2. Resident Leadership Councils (RLCs): RLCs serve as tenant organizations for RHA-managed properties. They advocate for residents, evaluate living conditions, promote independence, and foster good relationships between residents, HOME/RAB, and RHA staff. RLCs also provide a



platform for sharing information about RHA programs and offerings.

3. RHA Family Self-Sufficiency (FSS): RHA encourages residents to participate in FSS programs, which offer four distinct paths to self-sufficiency.

4. Life Force Development Institute (LDI): LDI is a 12-week educational program focusing on various skills, including effective communication, decision-making, and financial wellness. It provides residents with valuable skills and is recognized as a continuing education program by local employers.

5. Special Programs and Initiatives: RHA offers special programs such as ConnectHome, New Mix & Craft Entrepreneurship, and Resident Leadership Council to provide additional support and opportunities.

6. Resident Opportunities for Self-Sufficiency (ROSS): The ROSS program works closely with residents to create individual work plans related to employment and education. ROSS Case Managers assist in connecting residents with local agencies and services to achieve self-sufficiency.

7. Jobs Plus: This program allows residents to participate in education and job training programs, with partnerships involving over 52 community organizations. It also offers Jobs Plus Earned Income Disallowance (JPEID) to help residents retain income surplus, improve credit scores, and address financial needs.

8. Section III: RHA has established an award-winning Section III program, providing economic opportunities, apprenticeships, and job placements for Section 3 residents and businesses.

9. Housing Choice Voucher (HCV): RHA serves over 1,700 families through the HCV program, including 12 participants in the Home Ownership program.

10. Moving To Work (MTW) Designation: RHA's MTW designation allows for enhanced rent payment standards, property damage coverage, and signing bonuses for landlords. A "Landlord Liaison" position has been created to facilitate connections between residents and landlords, promoting housing choices and program participation.

RHA has recognized the profound importance of homeownership for low-income families and has taken significant steps to facilitate this opportunity. In collaboration with a local financial institution, we have established a home ownership program tailored specifically for our Low

Income Public Housing (LIPH) residents, who have historically lacked access to this path to prosperity.

Through this initiative, we are hosting home buying classes for those interested, with a primary emphasis on empowering residents to enhance their credit scores, diligently save for a down payment, and gain a comprehensive understanding of the financial requirements associated with home maintenance. This program seeks to break down barriers and provide a path to long-term stability and self-sufficiency, offering a brighter future for our residents and their families.

These initiatives embody RHA's commitment to resident empowerment, self-sufficiency, and community development.

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

Response:

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**

N/A

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

### **Introduction**

#### *Response:*

The City of Rockford is part of the IL-501 Boone, DeKalb, and 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 Northern Illinois 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**

#### *Response:*

The Northern Illinois 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 Health & 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. This outreach team works in collaboration with other agencies including shelter providers, mental health/health providers, law enforcement, and EMS Services. The goal of outreach is to get engaged with homeless persons and link them to permanent housing programs as quickly as possible. The goal is to get every newly identified person housed within 45 days of identification; however, due to lack of affordable housing and client choice, sometimes that goal is not met.

Remedies & Rockford Rescue Mission, both members of the Continuum of Care, place 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 CoC provides domestic violence training to all member agencies. The Family Peace Center has also become a member of the CoC and has partnered with HHS to request funding through HUD CoC programs.

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 Health & 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 a short term goal of ending family and youth homelessness. The overarching goal of the program would be to reach "functional zero" for all populations. The City continues to work with partners at Built for Zero to reach this goal.

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

#### **Response:**

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. During winter months, "overnight cafes" open, creating a warm place to go for those who will not access shelter services.

**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**

*Response:*

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 Health & Human Services Community Service Division offers three (3) housing assistance programs. These are: rapid rehousing, homeless prevention, and condemnation relocation. In addition, the agency partners with other local housing providers including local housing authorities to refer clients for special Voucher opportunities. Currently there is a partnership with RHA to refer clients for Family Unification Vouchers (FUP), VASH (vouchers for veterans), and Emergency Housing Vouchers (EHV). There is also a partnership with WCHA to refer clients for FUP, VASH, and Mainstream Vouchers. The CoC is currently awaiting an update regarding the application for the new HUD Stability Vouchers that would also benefit the homeless population and be referred through the Coordinated Entry System. The Community Service Division offers a 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. Through this Coordinated Entry system, any person who is experiencing “literal homelessness” can be assisted. Literal homeless includes anyone in shelters, transitional housing program for homeless, people fleeing domestic violence, and those who are unsheltered or living in places not meant for human habitation.

All persons housed through PSH or Rapid Rehousing continue to work with a case manager up to six months beyond leaving the program for stability purposes. In addition, the City's is working with it's CoC partners to implement a CoC-wide homeless diversion program to work with persons at risk of homelessness to provide them with the necessary referrals and resources to avoid homelessness. Agencies have received State of Illinois funding for this endeavor.

**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.**

*Response:*

All persons at risk of homelessness or who are literally homeless enter the network of agencies that make up the CoC system through the single point of entry. Homeless prevention is accomplished through use of a screening tool that identifies needed supports and resources for avoiding homelessness. Referrals are then made to the appropriate agency to provide supports needed. This may include agencies such as Rockford Township for general assistance, IDHS for cash and food benefits, the local WORKS center or Workforce Connection for employment supports.

The City of Rockford Health & 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 Health & 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.

The Health & Human Services Department & the CoC have worked with various systems of care on discharge planning. The local hospitals have been trained to call the Coordinated Entry System prior to discharging anyone who is homeless from their facilities. At that time, they work together to determine a proper discharge plan. The Department also has a contract in place with DCFS to work with youth aging out of foster care, so that they do not become homeless or can be quickly housed if they need to be. The City and the CoC continue to work on strategies to address people coming out of mental health or corrections programs, as they many times will not alert us when homeless persons are returning

to the community. Because many of these institutions are out of the COC service area, it makes it more of an issue.

## **Discussion**

### *Response:*

The “Other Special Needs Strategy” is one of six (6) Priority Needs addressed within the City’s Annual Action Plan. This strategy includes housing and supportive service actions specifically for non-homeless special needs persons: elderly, frail elderly, persons with disabilities, person with HIV/AIDS and their families, and public housing residents. The City designates if a Priority Need is High or Low Priority. If designated as a High priority, the Priority Need is expected to be funded during FY 2024. If designated as Low Priority, the Priority Need may not be funded during FY 2024. The “Other Special Needs Strategy” is ranked Low Priority. However, non-homeless special needs persons are eligible to apply for federally funded programs administered through the City, including a home accessibility and barrier removal program for people with disabilities. In addition, the City may support applications for other funding, if the application is consistent with the needs identified in the 2020-2024 Five-Year Consolidated Plan.

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

**Introduction:**

*Response:*

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 continues to support Fair Housing policies and other local and regional partners in their fair housing activities and initiatives. As part of the City's Consolidated Plan process, the City completed an *Analysis of Impediments to Fair Housing Choice for FY 2020*. Five impediments were identified, including the need for fair housing education and outreach, and the need for decent, safe, and affordable rental housing and for-sale or rent accessible housing. There is also a lack of affordable homeownership opportunities, and economic issues that affect fair housing choice.

**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.**

*Response:*

The City of Rockford plans to take the following actions during 2024:

- Solicit ideas and feedback about opportunities to provide fair housing training, education or programming in the community
- Support outreach activities addressing Fair Housing education as led by Prairie State Legal Services
- Make informational brochures and other resources on fair housing rights available to residents
- Support the efforts of the community relations commission
- Support the efforts of fair housing groups and organizations
- Staff will participate in fair housing training opportunities, as available
- Continue to manage the Vacant & Foreclosed Property Registry
- 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
- 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

- Continue to provide local municipal funding for Code Enforcement to identify buildings and units that need to be maintained and rehabilitated in accordance with local codes
- Enhance job description and training for Residential Properties Inspector, including certifications in lead assessment, International Property Maintenance Code, and Residential Remodeling.
- Support homebuyer education and training programs to improve homebuyer awareness and increase the opportunities for lower-income households to become homebuyers
- Support and provide funds for down payment assistance to lower-income households to become homeowners
- Support and encourage plans from both private developers and non-profit housing providers to develop and construct new affordable housing that is for-sale
- Support and encourage the acquisition, rehabilitation and resale of existing housing units to become decent, safe, and sound
- 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
- Support and encourage the development of accessible housing units in the City
- Continue to provide support, education, and technical assistance opportunities to minority, women owned, and small businesses
- Continue to promote and encourage economic development with local commercial and industrial firms to expand their operations and increase employment opportunities
- Support and encourage private and non-profit developers and businesses to provide assets (grocery stores, services, etc.) in low to moderate income neighborhoods
- Continue to support Region 1 Planning Council/Northern Illinois Land Bank and their efforts

**Discussion:**

N/A

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

#### *Response:*

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**

#### *Response:*

The City under its 2024 Program Year will take the following actions to address obstacles to meeting the underserved needs:

- Continue to work on local 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 provide funds for homebuyer assistance.
- Continue to support new housing construction of owner occupied and renter occupied housing units that are decent, safe, sound, affordable, and accessible.
- Continue to support acquisition/rehab of owner occupied and renter occupied housing units that are decent, safe, sound, affordable,

and accessible.

- Continue to fund projects that assist businesses.
- Continue to leverage resources for minority and women owned businesses.
- Continue to leverage its financial resources and apply for additional public and private funds.
- Continue to provide services and resources to homeless individuals and households.

#### **Actions planned to foster and maintain affordable housing**

##### *Response:*

The City of Rockford will coordinate with 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 creation, and retention activities.

HHS received a grant from Community Solutions to implement a Landlord Engagement Program. This will look at ways to increase the number of landlords who will work with the underserved population to provide safe, affordable housing through incentives and a direct line of communication for participating landlords.

The City of Rockford will undertake the following projects to maintain affordable housing:

- **Housing Rehabilitation** - Funding will increase the number of decent, safe, and sanitary single family housing which will be occupied by low income beneficiaries (homeowner with or without special needs).
- **Homeownership** - Direct homebuyer assistance is available to low-income households purchasing single family units.
- **Housing Development** - 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).
- **Infrastructure** - Funding will be used for reconstruction projects including but not limited to new asphalt pavement, storm sewer system, curb and gutter, sidewalk facilities, upgraded bicycle level of service, handicap accessibility improvements/removal of

architectural barriers, and flood drainage improvements.

- **Emergency Solutions Grant** - ESG funds will be used for housing, operations/support, prevention and re-housing, and administration.

#### **Actions planned to reduce lead-based paint hazards**

##### Response:

The City continues to work 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 assessments, 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, 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**

#### *Response:*

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:

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

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**

#### *Response:*

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 FY2024 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 2022, the City worked with Rockford Local Development Corporation, a non-profit lender, to establish and launch the Rockford Community Investment Fund (RCIF). RCIF is now a certified CDFI and provides construction loans to contractors completing acquisition/rehab projects. RCIF has completed over 70 loans so far, and all of the homes were sold to homeowners.
- Four years ago, the City created a new staff position 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. In 2024, this staff member is working with Public Works, Police, and Fire to coordinate neighborhood efforts, and with local residents to host block parties.
- 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, housing rehabilitation, economic development).

#### **Non-Profit Organizations -**

- The City certifies CHDOs at the time of application for an affordable housing project and also on an annual basis during the term of affordability.
- 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**

**Response:**

The City is committed to continuing its participation and coordination with public and private housing and social service agencies. The Neighborhood Development pages of the City website includes a list of resources for Fair Housing, Homebuyer Assistance programs, Mow to Own programs etc. Under the Health and Human Services Department's 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.

The City's Health and Human Services Department in collaboration with the CoC plan to increase marketing efforts to encourage new members to participate and apply for funding opportunities to address homelessness.

**Discussion:**

N/A

**Program Specific Requirements**

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

**Introduction:**

*Response:*

The City of Rockford receives an annual allocation of CDBG, HOME, and ESG funds. The minimum overall CDBG benefit for the City of Rockford is calculated on the following two (2) consecutive years: 2023 and 2024.

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

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

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



## 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.**

2023 and 2024

## 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:

#### Response:

The City of Rockford does not intend to use any other forms of investment other those described in 24 CFR 92.205(b).

### 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:

#### Response:

The Resale/Recapture guidelines used by the City are attached in the Grantee Unique Appendices.

The City does not use presumption of affordability for resale.

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:**

Response:

The City's Resale/Recapture guidelines explain how the City ensures affordability. These guidelines are attached in the Grantee Unique Appendices.

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:**

Response:

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. However, the City reserves the right to consider such action and will ensure that underwriting guidelines are developed and implemented following 24 CFR 92.206(b)(2). If and when guidelines are developed, they will be designed in accordance with 24 CFR 92.206(b)(2)(vi), which further states that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

5. **If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).**

Response:

N/A

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

Response:

N/A

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)).  
Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

Response:

N/A

**Emergency Solutions Grant (ESG)  
Reference 91.220(I)(4)**

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

*Response:*

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

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

*Response:*

The Rock River Homeless Coalition now known as Northern Illinois Homeless Coalition (NIHC) 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 Northern Illinois Homeless Coalition (NIHC) 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 includes both CoC/ESG funded agencies and those funded through other means. The NIHC also seeks collaborations with other key stakeholders in order to make this a community- wide effort to end homelessness in Winnebago, Boone, and Dekalb 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).**

*Response:*

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 reserves the right to provide these services directly as appropriate. 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 NIHC committee, reviews and makes recommendations for awards. These recommendations go to City Council for final approval.

**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.**

*Response:*

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

**5. Describe performance standards for evaluating ESG.**

*Response:*

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.

The Written Standards and Administrative Plan for ESG is attached as part of the Grantee Unique Appendices.

**Discussion**

N/A

# **City of Rockford**

## **2024 Annual Action Plan**

### **Citizen Participation**

- **Proof of publications**
  - **1<sup>st</sup> set of Public Hearings**
    - **(9/21/23 LOCALiQ Proof of Publication)**
  - **2<sup>nd</sup> set of Public Hearing & 30 day comment period**
    - **(11/1/23 & 11/8/23 LOCALiQ Proof of Publications)**
- **Samples of other media**
  - **1<sup>st</sup> set of Public Hearings**
    - **Flyers**
  - **2<sup>nd</sup> set of Public Hearings**
    - **News Flash/City Website**
    - **Flyer**
    - **Social media post**
    - **WREX post**
- **Proof/contingency provision for allocations**
- **Citizen Participation Plan**

# LOCALiQ

JournalStar | Journal-Standard  
Rockford Register Star

PO Box 631200 Cincinnati, OH 45263-1200

## **PROOF OF PUBLICATION**

Christine Manley  
Community Development  
City Of Rockford  
425 E State ST  
Rockford IL 61104-1014

STATE OF ILLINOIS, COUNTY OF WINNEBAGO

The Rockford Register Star, a secular newspaper, has been continuously published daily for more than fifty (50) weeks prior to the first publication of the attached notice, is published in the City of Rockford, County of Winnebago, Township of Rockford, State of Illinois, is of general circulation throughout that county and surrounding area, and is a newspaper as defined by 715 ILCS 5/5.

That the attached or annexed was published in the issue dated:

09/21/2023

and that the fees charged are legal.

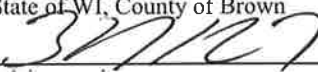
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### CITY OF ROCKFORD COMMUNITY & ECONOMIC DEVELOP- MENT

#### PUBLIC HEARINGS

Notice is hereby given that two public hearings will be held on Thursday, October 5, 2023. The purpose of the hearings is to provide an update of the 2023 Community and Economic Development program activities and provide the public with an opportunity to express their ideas and views on housing and community development needs. Comments will be noted and responded to as we develop our 2024 Annual Action Plan.

The first public hearing will take place at 12:00pm on Thursday, October 5, 2023 at Katie's Cup, 502 7th St. For those that cannot attend the first hearing, the information will be made available once again with an opportunity for the public to share comments at 5:30pm the same day, at Crusader Clinic, 1200 W State St. Both sessions will cover the same information. Interested participants only need to attend one session.

The plan satisfies the minimum statutory requirements for three formula programs: Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) and Emergency Solutions Grants (ESG) programs. The hearings will be held in accordance with PL 93-383, cited as the Housing and Community Development Act of 1974, as amended.

The hearings will be accessible upon request to non-English speaking residents or persons with disabilities. Such individuals who are planning to attend and need special accommodations should contact by email or telephone, the Neighborhood Development Division, Community and Economic Development Department, 425 East State Street, Rockford, Illinois 61104, 779-348-7162, by September 29, 2023 to make notice of their anticipated needs. NDHousing@RockfordIL.gov



# LOCALiQ

JournalStar | Journal-Standard  
Rockford Register Star

PO Box 631200 Cincinnati, OH 45263-1200

## **PROOF OF PUBLICATION**

Rea Sarker  
Community Development  
City Of Rockford  
425 E State ST  
Rockford IL 61104-1014

STATE OF ILLINOIS, COUNTY OF WINNEBAGO

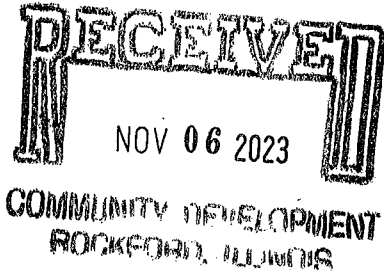
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VICKY FELTY  
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NOTICE OF PUBLIC  
HEARINGS AND  
AVAILABILITY OF THE  
CITY OF ROCKFORD'S  
2024 ANNUAL ACTION  
PLAN FOR PUBLIC  
REVIEW & COMMENT

Notice is hereby given that two public hearings will be held to present a draft of the 2024 Annual Action Plan (Plan), and to provide the public with an opportunity to express their ideas and views on this proposed plan. Both sessions will cover the same information. The first public hearing will take place at 12:00pm on Thursday, 11/16/23 at the Ethnic Heritage Museum at 1129 S Main St. The second hearing will take place at 5:30pm the same day, at Patriot's Gateway Community Center - 615 S 5th St. Both locations are accessible for persons with disabilities.

Notice is hereby given that a draft of the Plan will be on available for review and public comment starting Thursday, 11/2/2023 through Monday, 12/4/2023. The draft may be found on the City's website [www.rockfordil.gov](http://www.rockfordil.gov) and at the following locations during office hours: 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). If having difficulty accessing the Plan, call 779-348-7162.

The Plan summarizes available funding resources and proposed activities designed to meet community, housing, and economic development needs in Rockford. The Plan describes how 2024 Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME) and Emergency Solutions Grants (ESG), program income, and/or any available prior year funds will be spent. The funding levels of \$2,190,214 (CDBG), \$1,118,722 (HOME), and \$190,389 (ESG) are contingent upon the final approval of the 2024 Federal budget. Therefore, the Plan will be submitted to the U.S. Department of Housing and Urban Development (HUD) after HUD announces, and the City incorporates, the final FY 2024 allocation amounts in the Plan.

City Staff encourages public agencies, other interested parties, and all residents, including minorities, non-English speaking persons, and persons with disabilities, to comment regarding all of the draft documents. Comments received by 5pm 12/4/2023 will be taken into consideration as the plan is finalized. Written comments may be addressed to Sarah Leys, Housing and Program Manager, Dept. of Community and Economic Development and mailed or hand delivered to City Hall, 425 East State St (2nd Floor), Rockford, IL 61104, or emailed to [sarah.leys@rockfordil.gov](mailto:sarah.leys@rockfordil.gov).

The City 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 reasonable accommodations are needed for attending a public hearing, call 779-348-7162.

Si desea hablar sobre el contenido de este aviso con alguien que hable español, comuníquese con Giselle Martínez (779-348-7439) o Lucía Sorla-McFarlane (779-348-7441).

# LOCALiQ

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Community Development  
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11/8/2023

**NOTICE OF PUBLIC  
HEARINGS AND AVAIL-  
ABILITY OF THE CITY OF  
ROCKFORD'S  
2024 ANNUAL ACTION  
PLAN FOR PUBLIC  
REVIEW & COMMENT**

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Si desea hablar sobre el contenido de este aviso con alguien que hable español, comuníquese con Giselle Martinez (779-348-7439) o Lucia Soria-McFarlane (779-348-7441).

# 2024 ANNUAL ACTION PLAN PUBLIC HEARING

**CITY OF ROCKFORD**

**COMMUNITY & ECONOMIC DEVELOPMENT**



779-348-7162



NDHousing  
@rockfordil  
.gov

Two public hearings will be held on Thursday, October 5<sup>th</sup>, 2023. The purpose of the hearings is to provide an update of the 2023 Community and Economic Development program activities and provide the public with an opportunity to express their ideas and views on housing and community development needs. Comments will be noted and responded to as we develop our 2024 Annual Action Plan.

## **1st Hearing:**

**Katie's Cup | 502  
7<sup>th</sup> St, 10/5/2023  
@ 12:00PM**

## **2nd Hearing:**

**Crusader Community  
Health | 1200 W State  
St, 10/5/2023 @ 5:30PM**



**Espanol:** 779-348-  
7439 or 779-348-7441

**Need Accommodations?**  
Call 779-348-7442



# JUNTA PÚBLICA PARA EL PLAN DE ACCIÓN ANUAL 2024

## DESARROLLO COMUNITARIO Y ECONÓMICO



779-348-7162



NDHousing  
@rockfordil  
.gov

Se llevarán a cabo dos juntas públicas el jueves 5 de Octubre de 2023. El propósito de las juntas es proporcionar una actualización de las actividades del programa de desarrollo comunitario y económico de 2023 y brindar al público la oportunidad de expresar sus ideas y punto de vista sobre las necesidades de desarrollo sobre vivienda y la comunidad. Los comentarios serán anotados y respuestas se darán cuando desarrollemos nuestro Plan de Acción Anual 2024.

### 1er junta:

Katie's Cup | 502  
7<sup>th</sup> St, 10/5/2023  
@ 12:00PM

### 2da junta:

Crusader Community  
Health | 1200 W State  
St, 10/5/2023 @ 5:30PM



Espanol: 779-348-  
7439 or 779-348-7441

Necesita servicios  
especiales/discapacidad?  
779-348-7442

## [News Flash Home](#)

The original item was published from 10/24/2023 10:26:52 AM to 11/17/2023 12:00:01 AM.

### Neighborhood Development

Posted on: November 2, 2023

## [ARCHIVED] 2024 Annual Action Plan Public Hearings

Two public hearings will be held on Thursday, November 16, 2023. The purpose of these public hearings is to provide an overview of the City's 2024 Annual Action plan draft & provide the public with an opportunity to express their ideas & views on housing & community development needs. Comments will be noted & responded to as we finalize our 2024 Annual Action Plan. The City will also share our goals for the 2020-2024 Consolidated Plan.



## Other News in Neighborhood Development

### [Public Comment Period Now Open](#)

Posted on: June 12, 2024



### [City Opens Community Healing Center for Area Youth](#)

Posted on: April 16, 2024



### [Community Action 2024 Scholarship Applications Available](#)

Posted on: March 6, 2024

### [City of Rockford Rolls Out New Carts](#)

Posted on: February 20, 2024 | Last Modified on: February 20, 2024

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- [Public Works](#)
- [Citizen Portal](#)



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# 2024 ANNUAL ACTION PLAN PUBLIC HEARING

**CITY OF ROCKFORD**

**COMMUNITY & ECONOMIC DEVELOPMENT**

Two public hearings will be held on Thursday, November 16, 2023. The purpose of these public hearings is to provide an overview of the City's 2024 Annual Action plan draft & provide the public with an opportunity to express their ideas & views on housing & community development needs. Comments will be noted & responded to as we finalize our 2024 Annual Action Plan. The City will also share our goals for the 2020-2024 Consolidated Plan.



779-348-7162



ndhousing@  
rockfordil.gov

## 1st Hearing:

Ethnic Heritage Museum  
1129 S Main St |  
11/16/2023 @ 12:00pm

## 2nd Hearing:

Patriot's Gateway  
Community Center | 615 S  
5<sup>th</sup> St | 11/16/2023 @ 5:30pm



**Espanol:** 779-348-7439  
or 779-348-7441

## Need Accommodations?

Call 779-348-7442





# **2024 Annual Action Plan Public Hearings 11/16/23:**

**12:00pm: Ethnic  
Heritage Museum,  
1129 S. Main St**

**5:30pm: Patriot's  
Gateway Community  
Center, 615 S. 5<sup>th</sup> St**

Two public hearings will be held on Thursday, November 16, 2023. The purpose of these public hearings is to provide an overview of the City's 2024 Annual Action plan draft & provide the public with an opportunity to express their ideas & views on housing & community development needs. The first public hearing will take place at 12:00pm on Thursday, 11/16/23 at the Ethnic Heritage Museum at 1129 S Main St. The second hearing will take place at 5:30pm the same day, at Patriot's Gateway Community Center – 615 S 5th St. Both locations are accessible for persons with disabilities. Comments will be noted & responded to as we finalize our 2024 Annual Action Plan. The City will also share our goals for the 2020-2024 Consolidated Plan.

A draft of the 2024 Annual Action Plan is available for review and public comment through Monday, 12/4/2023. The draft may be found on the City's website [www.rockfordil.gov](http://www.rockfordil.gov) and at the following locations during office hours: City Hall Community & Economic Development Dept. (425 E State St – 2<sup>nd</sup> 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). If having difficulty accessing the Plan, call 779-348-7162.

Si desea hablar sobre el contenido de este aviso con alguien que hable español, comuníquese con Giselle Martinez (779-348-7439) o Lucia Soria-McFarlane (779-348-7441).

[YOUR 13 WEATHER AUTHORITY](#) | [Exactrak Forecast](#) | [Submit Your Weather Photos](#)

[STUFF THE BUS](#) | [School Supply Drive](#)

[https://www.wrex.com/news/rockford-calls-on-community-voices-for-public-development-hearings/article\\_fae3d516-80b5-11ee-89c2-43d3e41471d4.html](https://www.wrex.com/news/rockford-calls-on-community-voices-for-public-development-hearings/article_fae3d516-80b5-11ee-89c2-43d3e41471d4.html)

## Rockford calls on community voices for public development hearings

Nathan Langley

Nov 11, 2023

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ROCKFORD, Ill. — Two public hearings will soon be held regarding Rockford's 2024 Annual Action Plan on housing and community development needs.



By Andrew Carrigan

The city invites the community to share their thoughts on the proposals addressing housing and local development needs.



**URGENT ALERTS: Sign-Up for the 13 WREX Newsletter. The day's biggest headlines, from breaking news to important weather updates; delivered right to your inbox.**

Providing an overview of the city's annual plan, the public events lets locals learn about the current draft and express their ideas on community housing needs the plan seeks to address.

Comments from residents will be noted and responded to as the city finalizes their 2024 plan.

Rockford will also share their goals for the 2020-2024 Consolidated Plan affecting the area.

The first public hearing takes place at noon on Thursday, Nov. 16, at the Ethnic Heritage Museum – 1129 S. Main St.

A second hearing commences the same day at 5:30 P.M. at Patriot's Gateway Community Center – 615 S. 5th St.

In a social media post on the event, the city explains both locations are accessible for persons with disabilities.



City of Rockford Government  
about 8 months ago

## 2024 Annual Action Plan Public Hearings 11/16/23:

12:00pm: Ethnic  
Heritage Museum,  
1129 S. Main St

5:30pm: Patriot's  
Gateway Community  
Center, 615 S. 5<sup>th</sup> St

**ACTION PLAN PUBLIC HEARINGS:** Two public hearings will be held on Thursday, November 16, 2023. The purpose of these public hearings is to provide an overview of the City's 2024 Annual Action plan draft and provide the public with an opportunity to express their ideas & views on housing & community development needs.

The first public hearing will take place at noon on Thursday, November 16, at the Ethnic Heritage Museum at 1129 S Main St. The second hearing will take place at ... [See more](#)

3 1 1

A draft of the 2024 plan is available for review and public comment through Dec. 4. Those interested can find a copy on the city's website 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)
- Rockford Public Library locations (214 N Church St, 1238 S Winnebago St, and 6685 E State St)



**WATCH: 13 WREX is LIVE on YouTube, ON DEMAND -- with breaking news and severe weather coverage.**

If having difficulty accessing the plan, call 779-348-7162.

**Tags**

Law

Medicine

Internet

The Economy

Sociology

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**Nathan Langley**

Photojournalist

Nathan Langley joins 13 WREX as a Photojournalist after graduating from the University of Illinois at Urbana-Champaign with a Bachelor's in English and Political Science: International Relations.





# **PUBLIC HEARING 2024 ANNUAL ACTION PLAN**

**NOVEMBER 16, 2023**



# **ADDITIONAL LOCAL POLICY & PROGRAMING DETAILS**

- Adjustments will be made to the 2024 budget once actual allocations are announced by the Department of Housing and Urban Development (HUD).
- Any increases or decreases in CDBG and/or HOME funds will be applied to projects in need or slow moving, respectively.
- The City anticipates that it will incur pre-award costs for 2024 funds.
- Any CHDO operating dollars that are not requested or committed by the end of the calendar year will automatically be moved to the HOME Housing Development project.



# **ADDITIONAL LOCAL POLICY & PROGRAMING DETAILS**

## **Amendments and Substantial Amendments**

A substantial change to the plan invokes the citizen participation process and City Council approval.

- A substantial amendment is required:
  - ✓ Proposed Projects that differ from the specific Projects that were originally identified in the action plan or 5-year consolidated plan.
  - ✓ Any individual increases or decreases in grant dollars that equal 30% or more of that program year's grant allocation, and as amended.



# PLANNING CALENDAR

**November 2 – December 4, 2023**

## **Public Comment Period**

Draft plans are available at the following locations:

- ✓ [www.RockfordIL.gov](http://www.RockfordIL.gov)
- ✓ Rockford City Hall – 425 E. State Street, 2<sup>nd</sup> floor
- ✓ Rockford Health & Human Services Dept. – 612 N. Church
- ✓ Rockford Housing Authority – 223 S. Winnebago St.
- ✓ Rockford Public Library Branches – 214 N. Church Street, 1238 S. Winnebago Street, and 6685 E. State Street

**December 2023 - January 2024**

Present plans to City Council for approval.

## **Submission to HUD: Date TBD**

HUD announces the City's grant allocation, City staff update the budget, and submit plans to HUD within 45 days.





# **CITIZEN PARTICIPATION PLAN**

## **CITY OF ROCKFORD**

### **COMMUNITY PLANNING AND DEVELOPMENT PROGRAMS**

Effective January 1, 2023  
(Contacts updated 5.20.2024)

## **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 (including gender and sexual orientation), 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 (40 and older), military status or unfavorable discharge from military service, marital status, order of protection status, and source of income.

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. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the plan and any amendments.

CEDD is required to provide for technical assistance to groups representative of low- and moderate-income residents that request such assistance in developing proposals for funding assistance under any of the programs covered by 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 the following:

- Budget; i.e., expected funding amounts, including program income, and activities to be undertaken;
- The estimated amount of funding that will benefit persons of low and moderate-income;
- 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 will specify the types and levels of assistance that will be available (or require others to make available) to persons displaced;
- At the time or, as soon as feasible, after the start of the public participation process, the City will make available the HUD-provided data and any other supplemental information that the City plans to

incorporate into the consolidated plan. This data may be made available by cross-referencing to the data on HUD's website; and

- When and how the City will make the information above available.

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) and at public places such as the library and other governmental offices. Upon request, the CEDD will make reasonable accommodations for residents unable to view via website, this includes, but is not limited to providing a reasonable number of free copies of the plan to residents and groups that request it.

CEDD shall maintain records to demonstrate compliance with the Citizen Participation Plan. The City will provide reasonable and timely access to information and records relating to the plan, amendments and reports. 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 applicable 5-year consolidated plan (including program income, reimbursements, repayment, recaptures, or reallocations from HUD), which is 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. Criteria for substantial amendments are as follows:

1. Proposed Projects\* differ from the specific Projects that were originally identified in the action plan or 5-year consolidated plan.
2. Any individual increases or decreases in grant dollars that equal thirty (30) percent or more of that program year's grant allocation, and as amended (i.e., the Annual Action Plan).



\*Projects as defined in the City's Annual Action Plan and/or 5-year consolidated 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. 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.

Amendments under Public Health Recommendations or Major Disaster Declaration:

See Abbreviated Plan below.

## **Publishing & Notices**

A notice of availability of the proposed document for public review and comment will be published in one or more newspapers of general circulation prior to the submittal to HUD. This notice will provide the following:

- A short summary of the document that describes the content and purpose of the document;
- Details of the comment period (30 calendar days for plans and substantial amendments, 15 calendar days for performance reports);
- List of locations of where copies of the entire proposed plan or report may be examined; and

City staff will publish in one or more newspapers of general circulation, a notice of public hearing. Publication will take place, at a minimum, two (2) weeks in advance of the hearing.

City staff may publish any of the public notices described above as one or more notices.

In addition, the City will provide electronic and written marketing communications in advance of a Public Hearing.

Publishing & Notices under Public Health Recommendations or Major Disaster Declaration:

See Abbreviated Plan below.

## **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, proposed strategies and actions for affirmatively furthering fair housing, 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 plan or amendment is published for comment.

CEDD will try to hold public hearings at times and locations convenient to residents who may benefit or already benefit from the CPD programs. Locations will be accessible for residents with disabilities. In addition, CEDD 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.

Public Hearings under Public Health Recommendations or Major Disaster Declaration:

See Abbreviated Plan below.

## **Abbreviated Plan due to Public Health Recommendations or Major Disaster Declaration**

An abbreviated plan may be utilized under the following circumstances:

1. National or local health authorities (or other local, state or federal agencies) recommend social distancing and limiting public gatherings for public health reasons OR
2. The above-mentioned authorities or agencies make a major disaster declaration for an area which includes the City of Rockford.

The City may implement all or any portion of this abbreviated plan, which includes the following:

1. Marketing communications: The City will provide marketing communications, as available, at least 3 days in advance of a Public Hearing.
2. Public Comment Period: The public comment period will be a minimum of 5 days, if so approved by HUD.
3. Virtual Public Hearings: The City reserves the right to conduct virtual recorded public hearings, as appropriate, to ensure the health and safety of community residents. This includes, but is not limited to, adherence to any mitigation measures as required by public health officials and local, state or federal agencies. All efforts will be made to provide timely response to citizen questions and provide public access to questions and responses.

## **Community Planning and Development Program Complaint Process**

**Step 1:** Citizens may submit written complaints to the following:

### **Neighborhood & Housing Programs**

Sarah Leys – Deputy Director of the Community & Economic Development Dept.

[Sarah.Leys@rockfordil.gov](mailto:Sarah.Leys@rockfordil.gov)

779-348-7162

### **Economic Development Programs**

Todd Cagnoni – Interim Director of the Community & Economic Development Dept.

[Todd.Cagnoni@rockfordil.gov](mailto:Todd.Cagnoni@rockfordil.gov)

779-348-7162

### **ESG & Homeless Programs**

Angie Walker, Homeless Program Coordinator

[angie.walker@rockfordil.gov](mailto:angie.walker@rockfordil.gov)

779-348-7567

### **ESG & Homeless Programs**

Christopher Greenwood, Community Services Director

[christopher.greenwood@rockfordil.gov](mailto:christopher.greenwood@rockfordil.gov)

779-348-7569

**Step 2:** Each person indicated above will make every effort to provide a written response within 15 business days of receipt of a written complaint.

**Step 3:** Should the Citizen request additional review, contact the following:

Todd Cagnoni – Director of the Community & Economic Development Dept.

[Todd.Cagnoni@rockfordil.gov](mailto:Todd.Cagnoni@rockfordil.gov)

779-348-7162

Anqunette Parham, Executive Director, Health & Human Services Dept.

[Anqunette.Parham@rockfordil.gov](mailto:Anqunette.Parham@rockfordil.gov)

779-348-7170

**Step 4:** A record of each complaint received by the City 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 complaint.

**City of Rockford**

**2024 Annual Action Plan**

**Grantee Unique Appendices**

- **Resale/Recapture**
- **CDBG Map**
- **Written Standards & Administrative Plan**

## 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:**

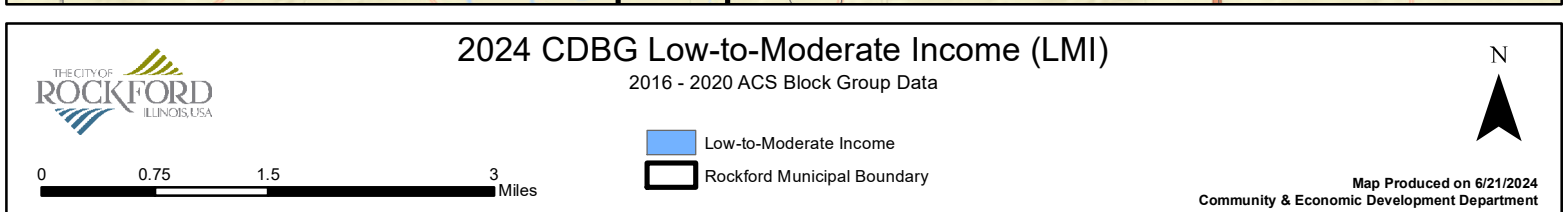
For resale, the total amount of HOME funds invested in the unit (*developer subsidy* plus *direct HOME subsidy*) determines the length of time the *period of affordability* lasts. The homebuyer will sign a resale covenant, a promissory note, and a mortgage. Recorded at the Winnebago County Recorder's 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.





**WRITTEN STANDARDS &  
ADMINISTRATIVE PLAN**

**FOR THE**

**EMERGENCY SOLUTIONS GRANT  
(ESG)**

**Prepared by the City of Rockford Human  
Services Dept.  
Community Services Division  
*A Community Action Agency***

***August 2021***

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<i>C</i>	<i>RENT REASONABLENESS</i>
<i>D</i>	<i>UNIT INSPECTION</i>
<i>E</i>	<i>CONTRACT EXECUTION</i>
<i>SECTION VI</i>	<i>TERMINATION OF BENEFITS</i>
<i>A</i>	<i>MAXIMUM LIMIT ON ASSISTANCE</i>
<i>B</i>	<i>TERMINATION AS A RESULT OF INCOME</i>
<i>C</i>	<i>TERMINATION FOR MULTIPLE LEASE VIOLATIONS</i>
<i>D</i>	<i>TERMINATION FOR NON-COMPLIANCE</i>
<i>E</i>	<i>TERMINATION AS A RESULT OF ABSENCE FROM A UNIT</i>
<i>F</i>	<i>PROHIBITION OF DUPLICATE SUBSIDIES</i>
<i>G</i>	<i>PROHIBITION OF PORTABILITY</i>

**SECTION VII      *GREIVANCE PROCEDURES***

**A                      *INFORMAL REVIEWS FOR APPLICANTS***

**B                      *INFORMAL HEARING FOR PARTICPANTS***

**CHAPTER V:      *HMIS***

**CHAPTER VI:     *OTHER FEDERAL REQUIREMENTS***

**CHAPTER VII:    *REPORTING AND RECORD KEEPING***

**CHAPTER VIII:   *STANDARDS FOR PROGRAM EVALUATION***

**CHAPTER IX:     *STANDARDS FOR MAKING SUBAWARDS***

# CHAPTER I

## INTRODUCTION AND OVERVIEW

The City of Rockford Human Services Department (COR-HSD) has adopted the following administrative standards for the operation and prioritization of Emergency Solutions Grant (ESG) funding in accordance with Federal Regulations 24 CFR 91.2209(l)(4)(i); 567.400(e)(1) and (e)(3). These standards serve as the administrative guidelines and procedures to be used by the HSD in implementing programs funded with ESG dollars to ensure consistent treatment of applicants/participants and compliance with funding requirements.

The COR is awarded ESG funds from the Department of Housing and Urban Development (HUD) on an annual basis as part of the Consolidated Plan and Annual Action Plans. These plans prescribe the statutory planning and application requirements for the following entitlement programs: Community Development Block Grant (CDBG); HOME Investment Partnership (HOME); Housing Opportunities for Persons with AIDS (HOPWA) and Emergency Solutions {formally Shelter} Grant (ESG).

Authorized by subtitle B of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371-11378), ESG funds are designed to provide sheltered and unsheltered homeless persons and those at risk of homelessness with services necessary to help them quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

ESG funds can be used for the rehabilitation or conversion of buildings for use as emergency shelter for the homeless, for the payment of certain expenses related to operating emergency shelters, for essential services related to emergency shelters and street outreach for the homeless, for homelessness prevention and rapid re-housing assistance and for Homeless Management Information Systems (HMIS).

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act placing stronger emphasis on homelessness prevention and rapid re-housing assistance. The COR-HSD has followed suit and has directed a majority of its ESG allocation towards homelessness prevention and rapid re-housing activities, plus supporting the Coordinated Intake and Assessment process, and follows a policy of outreach in the following order of priority:

1. Chronically homeless individuals and families with the longest history of homelessness and with the most severe service needs
2. Chronically homeless individuals and families with the longest history of homelessness
3. Chronically homeless individuals and families with the most severe service needs
4. All other chronically homeless individuals and families.

## CHAPTER I/SECTION I

### DEFINITIONS AND ABBREVIATIONS

The Emergency Solutions Grant is a federal formula grant authorized under the Department of Housing and Urban Development (HUD). A *federal formula grant* is awarded to a jurisdiction based upon a formula that takes into account factors such as the number of households in poverty, age of housing stock, population and economic growth, and in the case of HOPWA, the number of reported cases of people with AIDS in the metropolitan area. The U.S. Congress appropriates federal grants annually so each grant amount may vary from year to year. The City of Rockford in Winnebago County, considered an Urban County as defined by HUD, is a direct grantee of CDBG, HOME and ESG formula grant. *Grantee* means the person or legal entity to which a grant is awarded and that is accountable for the use of the funds provided. Each grant fund is subject to specific regulatory requirements and has specific applications for which the funds can be spent: *The Emergency Solutions {formally Shelter} Grant (ESG)* recipients are state governments, large cities, and urban counties who provide assistance to individuals and families to quickly regain stability in permanent housing after experiencing a housing crisis or homelessness.

As a recipient of these formula grant funds, the City of Rockford is required to produce the following documents:

***The Consolidated Plan*** is a five-year planning document intended to establish a unified vision for community development, outline coordinated strategies to address community needs related to housing and economic development, identify proposed programs and establish goals and project accomplishments over the five-year period.

***Annual Action Plan*** is the annual planning document that describes how the specific federal formula funds are going to be spent over the course of the upcoming program year and the projects that will be undertaken to accomplish the strategies and goals that were set forth in the five-year Consolidated Plan.

***Consolidated Annual Performance and Evaluation Report (CAPER)*** is the annual report that evaluates the uses of the federal grants, outlines the yearly expenditures, and assesses the jurisdictions' progress at implementing their Annual Action Plan as well as reaching the goals set in the five-year Consolidated Plan.

***Substantial Amendment*** is an amendment to any the aforementioned documents by which a "substantial change" in priority need/objective or planned activity is to occur. A "substantial change" is defined further in the Citizen Participation Plan.

Emergency Solution Grant funds can be used to provide a range of services and support under five *program components*: Street Outreach, Emergency Shelter, Rapid Re-Housing, Homelessness Prevention, and HMIS.

**Street Outreach** activities are designed to meet the immediate needs of unsheltered homeless persons by connecting them with emergency shelter, housing, and/or critical health services.

**Emergency Shelter** activities are designed to increase the quantity and quality of temporary shelters for homeless persons, through the renovation of existing shelters or conversion of buildings into shelters, paying for the operating cost of shelters, and providing essential services.

**Rapid Re-Housing** activities are designed to move homeless persons quickly to permanent housing through housing relocation and stabilization services and short- and/or medium-term rental assistance.

**Homelessness Prevention** activities are designed to prevent an individual or family from moving into an emergency shelter or living in a public or private place not meant for human habitation through housing relocation and stabilization services and short- and/or medium-term rental assistance.

**HMIS** (Homeless Management Information System) activities are designed to fund ESG recipients' and subrecipients' participation in the HMIS collection and analyses of data on individuals and families who are homeless and at-risk of homelessness including data gathered in the Single Point of Entry process.



*Homeless* is categorized as:

Literally Homeless	<p>(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> <li>(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;</li> <li>(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or</li> <li>(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;</li> </ul>
Imminent Risk of Homelessness	<p>(2) An individual or family who will imminently lose their primary nighttime residence provided that:</p> <ul style="list-style-type: none"> <li>(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;</li> <li>(ii) No subsequent residence has been identified; and</li> <li>(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;</li> </ul>
Homeless under other Federal statutes	<p>(3) 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:</p> <ul style="list-style-type: none"> <li>(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 732a), 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);</li> <li>(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;</li> <li>(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; and</li> <li>(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; or</li> </ul>
Fleeing/ Attempting to flee Domestic Violence	<p>(4) Any individual or family who:</p> <ul style="list-style-type: none"> <li>(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other 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 to their primary nighttime residence;</li> <li>(ii) Has no other residence; and</li> <li>(iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.</li> </ul>

**Annual (gross) Income** means the gross amount, monetary or not which go to or on behalf of the individual or family household that is anticipated to be received during the coming 12-month period. Annual income also includes amounts derived from assets.

**Household** means the family and approved live-in aide.

**Dependent.** A member of the family (except foster children and foster adults) other than the family head or spouse, who is under 18 years of age, or is a person with a disability, or is a full-time student.

**Guest** means a person temporarily staying in the unit with the consent of a tenant or other member of the household who has express or implied authority to so consent on behalf of the tenant.

**Covered person** means a tenant, any member of the tenant's household, a guest or another person under the tenant's control.

**Other person under the tenant's control**, for the purposes of the definition of *covered person* means that the person, although not staying as a guest (as defined in this section) in the unit, is, or was at the time of the activity in question, on the premises (as *premises* is defined in this section) because of an invitation from the tenant or other member of the household who has express or implied authority to so consent on behalf of the tenant. Absent evidence to the contrary, a person temporarily and infrequently on the premises solely for legitimate commercial purposes is not *under the tenant's control*.

**Premises** means the building or complex or development in which the public or assisted housing dwelling unit is located, including common areas and grounds. *Fair Market Rents (FMRs)* are gross rent estimates for an area and serve as the rent ceiling for rental assistance funded with ESG and calculated by MSA statistical area. The FMRs are re-calculated each year by HUD using American Community Survey (ACS) data as well as regional or local data. They include the shelter rent plus the cost of all tenant-paid utilities, except telephones, cable or satellite television service, and internet service.

**MSA** means a metropolitan statistical area.

**Utility allowance.** If the cost of utilities (except telephone) and other housing services for an assisted unit is not included in the tenant rent but is the responsibility of the family occupying the unit, an amount equal to the estimate made or approved by a PHA or HUD of the monthly cost of a reasonable consumption of such utilities and other services for the unit by an energy-conservative household of modest circumstances consistent with the requirements of a safe, sanitary, and healthful living environment.

**Public Housing Agency (PHA)** means any State, county, municipality, or other governmental entity or public body, or agency or instrumentality of these entities that is authorized to engage or assist in the development or operation of low-income housing under the 1937 Act.

**Rent Reasonableness** is the process to determine if the rent being requested for the unit or room is reasonable to rates being charged for non-assisted market rate units. If a rent is determined to be higher than the market, it may be the unit is charging more given the status of the tenant's participation in an assistance program.

**Unit Inspection** is the processing to determine if the unit or room selected by the household meets the minimum housing standards established for the ESG program.

**Housing Subsidy Contract** is the contract agreement between agency and the owner/property management of a rental unit which sets forth the terms under which the rental assistance is provided.

**Emergency Shelter** means any facility where the primary purpose is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements.

**1937 Act** means the United States Housing Act of 1937 (42 U.S.C. 1437 *et seq.*)

**ADA** means the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 *et seq.*).

**Department** means the Department of Housing and Urban Development.

**HUD** means the same as *Department*.

**Drug** means a controlled substance as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802).

**Drug-related criminal activity** means the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug.

**Violent criminal activity** means any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage.

**Fair Housing Act** means title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988 (42 U.S.C. 3601 *et seq.*).

**Federally assisted housing** means housing assisted under any of the following program.

(1) Public housing;

(2) Housing receiving project-based or tenant-based assistance under Section 8 of the U.S. Housing Act of 1937 (42 U.S.C. 1437f);

- (3) Housing that is assisted under section 202 of the Housing Act of 1959, as amended by section 801 of the National Affordable Housing Act (12 U.S.C. 1701q);
- (4) Housing that is assisted under section 202 of the Housing Act of 1959, as such section existed before the enactment of the National Affordable Housing Act;
- (5) Housing that is assisted under section 811 of the National Affordable Housing Act (42 U.S.C. 8013);
- (6) Housing financed by a loan or mortgage insured under section 221(d)(3) of the National Housing Act (12 U.S.C. 1715/(d)(3)) that bears interest at a rate determined under the proviso of section 221(d)(5) of such Act (12 U.S.C. 1715/(d)(5));
- (7) Housing insured, assisted, or held by HUD or by a State or local agency under section 236 of the National Housing Act (12 U.S.C. 1715z-1); or
- (8) Housing assisted by the Rural Development Administration under section 514 or section 515 of the Housing Act of 1949 (42 U.S.C. 1483, 1484).

*Public housing* means housing assisted under the 1937 Act, other than under Section 8. “Public housing” includes dwelling units in a mixed finance project that are assisted by a PHA with capital or operating assistance.

*Continuum of Care (CoC)* means a regional or local planning body that coordinates housing and services funding for homeless families and individuals. The COR is a member of the Rockford/Winnebago/Boone Counties Continuum of Care.

## **CHAPTER I/SECTION II**

### **COORDINATION AMONG PROVIDERS**

The COR serves as the grant administrator for all CoC and ESG grants within the Continuum and is an active member of the CoC. The COR-HSD’s location also serves as the Single Point of Entry for the homeless and implements the Coordinated Intake and Assessment procedure (adopted by the Continuum on 1/2/15) in partnership with participating agencies.

## **CHAPTER II**

### **STREET OUTREACH §576.101**

Under this component, ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing or critical services; and provide non facility-based care.

Eligible service costs under ESG include:

- Engagement
- Case Management
- Emergency Health Services
- Transportation
- Services for Special Population
- Emergency Mental Health Services

### **CHAPER II/SECTION I EVALUATION OF ELIGIBILITY**

The following eligibility criteria must be met in order for an individual or family to be provided services with ESG assistance under Street Outreach:

#### **1. Definition of Homeless**

For the purposes of program eligibility, a household must meet the definition of literally homeless or attempting to flee domestic violence where the individual or family also meets the criteria for literally homeless as defined in Chapter I, Section I of this plan or as spelled out in 24 CFR 576.2.icg

#### **2. Additional limitation**

Individuals and families must be living on the streets or other places not meant for human habitation and be unwilling or unable to access services in emergency shelter.

### **CHAPTER II/SECTION II STANDARDS FOR TARGETING AND PROVIDING ESSENTIAL SERVICES**

On January 2, 2015, the CoC adopted a Coordinated Intake and Assessment Procedure for all homeless and in need of housing in Winnebago and Boone Counties. (See attachment **A**)

## **CHAPTER III**

### **EMERGENCY SHELTER §576.102**

Under this component, ESG funds may be used for costs of providing essential services to homeless families and individuals in emergency shelters, renovating buildings to be used as emergency shelters, and operating emergency shelters.

The City of Rockford and CoC participating agencies are required to follow the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2CFR200)

Eligible service costs under ESG include:

- Case Management
- Education Services
- Employment Assistance and Job Training
- Life Skills Training

Eligible Shelter Operations under ESG include:

- Maintenance
- Rent
- Equipment
- Utilities
- Food
- Hotel/Motel Vouchers

### **CHAPTER III/SECTION I EVALUATION OF ELIGIBILITY**

The following eligibility criteria must be met in order for an individual or family to be provided services with ESG assistance under Emergency Shelter:

#### **1. Definition of Homeless**

For the purposes of program eligibility, a household must meet the definition of homeless in any of the 4 categories defined in Chapter I, Section I of this plan or as spelled out in 24 CFR 576.2.

### **CHAPTER III/SECTION II ADMISSION, ASSESSMENT, PRIORITAZION, DIVERSION, REFERRAL, REASSESSMENT OF NEED AND DISCHARGE**

See Coordinated Intake and Assessment Procedure (Attachment A)

## **CHAPTER IV**

### **HOMELESS PREVENTION §576.103 AND RAPID RE-HOUSING ASSISTANCE §576.104**

Under these two components, ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to either prevent a household from moving into an emergency shelter or help a homeless individual or family move into permanent housing and in all cases achieve stability in that housing.

The City of Rockford has chosen to fund all of these components with ESG funding.

Eligible financial costs under ESG include:

- Short-to-Medium term rental assistance
- Rental Arrears
- Rental Application Fees
- Security Deposits/Last Month's Rent
- Moving Costs

Eligible service costs under ESG include:

- Housing Search and Placement
- Housing Stability Case Management
- Mediation
- Legal Services
- Credit Repair

## **CHAPTER IV/SECTION I PRIORITIZATION ELIGIBILITY**

See Coordinated Intake and Assessment Procedure (Attachment A)

## **CHAPTER IV/SECTION II EVALUATION OF ELIGIBILITY**

The following eligibility criteria must be met in order for an individual or family to be provided services with ESG assistance under Homeless Prevention:

### **1. Definition of Homeless**

For the purposes of program eligibility, a household must meet the definition of an imminent risk of homeless, homeless under other Federal Statutes or attempting to flee domestic violence as defined in Chapter I, Section I of this plan or as spelled out in 24 CFR 576.2

### **2. Tie to City of Rockford**

The individual or family must have been a resident of the City of Rockford (see Attachment A) prior to homelessness and must be residing within City limits while homeless. Must also restrict new housing to City of Rockford.

### **3. Annual Income**

The household must have an annual income at or below 30 percent of area median income.

The following eligibility criteria must be met in order for an individual or family to be provided services with ESG assistance under Rapid Re-housing. (see Attachment B)

### **1. Definition of Homeless**

For the purposes of program eligibility, a household must meet the definition of literally homeless or attempting to flee domestic violence where the individual or family also meets the criteria for literally homeless as defined in Chapter I, Section I of this plan or as spelled out in 24 CFR 576.2. If a household loses their homeless status during the housing search process, they will no longer be eligible for ESG Rapid Re-Housing assistance.

### **2. Tie to Rockford**

The individual or family must have been a resident of the City of Rockford prior to homelessness and must be residing within City limits while homeless. They must also restrict their new housing to City of Rockford.



## A. PROCEDURE TO DETERMINE ELIGIBILITY

Before providing assistance to a household with ESG funds, a complete initial intake evaluation will be done which will include:

*Verification of Homeless status eligibility*

*Verification of tie to City of Rockford*

*Verification of Household Income*

*Assessment of Need*

The individual or family household must provide all requested verification documents and sign any release related to verifying the households' eligibility, including all items necessary for reporting HMIS.

### **1) Verification of Homeless status eligibility**

Documentation will need to be supplied or collected based upon the following hierarchy and order of priority.

1<sup>st</sup> – Third party documentation

2<sup>nd</sup> – Observation by the intake worker

3<sup>rd</sup> – Self-declaration from the individual or family seeking assistance

Acceptable evidence of third party documentation includes:

Records contained in an HMIS database; or

Comparable database used by victim service or legal service providers;

Written observations by an outreach worker of the conditions where the individual or family was living;

A referral from a publicly or privately operated shelter;

Discharge paperwork or written/oral referral from a social worker, case manager, or other appropriate official of an institution stating the beginning and end dates of the time residing in the institution.

- All oral statements must be recorded by the intake worker

For those that are at risk of homelessness, third party would include:

A court order resulting from an eviction action or an equivalent notice to terminate under state law that requires the individual or family to leave their residence within 14 days after the date of their request for assistance;

Written or oral statement by the owner or renter of the housing stating that the individual or family will not be allowed to stay for more than 14 days after the date of their request for assistance;

- All oral statements must be recorded by the intake worker

Observation by the intake worker:

If the intake worker can access HMIS or a comparable database (which retains an auditable history of all entries including the person who entered the data, the date of entry, and any changes made) to establish their homeless status.

Self-declaration from the individual household or family will include:

completion of the self-declaration form *and*

Written record on the intake worker's attempts to obtain third-party verification.

## **2) Verification of tie to City of Rockford**

Verification of a household's tie to the City of Rockford will most likely be documented through their verification of homeless status and/or verification of income.

The household must provide evidence of their tie to the City of Rockford whether they currently reside in the City of Rockford in the case of homeless prevention, or currently reside in a shelter or are precariously housed in City of Rockford in the case of rapid re-housing.

The household may currently work in the City of Rockford and are able to provide proof of their employment.

The household (including their children) may currently attend a school institution in Rockford School District 205 and are able to provide proof of their enrollment.

## **3) Verification of Household Annual Income**

At initial intake, verification of household income must be collected to determine eligibility in the case of homeless prevention assistance. Verification of income will also serve as the basis for determining the household's contribution towards rental assistance should their determined assessment of need be on-going rental assistance.

For the purpose of determining eligibility, a household's future income must be projected over the next 12 months based upon the household's current circumstances. Dakota County will assume the household's current circumstances will continue for the next 12 month unless there is verifiable evidence it will be different.

Household income includes all sources of income (for all members in the household) and it also includes assets (for all members in the household). See Section III for further details related to annual income.

Documentation will need to be supplied or collected based upon the following hierarchy and order of priority.

1<sup>st</sup> – Source documents

2<sup>nd</sup> – Third party verification

3<sup>rd</sup> – Self-certification from the household

Source documents include (but are not limited to):

- Pay stubs or wage statements
- Bank statements
- Social Security award notice
- Child support payment record
- General Assistance or TANF letter

Third party verification would be collected directly from the employer, social security administration, public assistance agency or financial institution. To conduct third party verifications, the household must sign a release form that authorizes the third party to release the required information.

Self-declaration from the individual household or family should only be used if source documents cannot be supplied and attempts to collect third party verification are unsuccessful. Acceptable self-declaration may include:

- Completion of a self-declaration form or a signed written statement from the head of household **and** household member if the income/asset pertains directly to that member. If the member is under age 18, they will not be required to sign.

Written record on the intake worker's attempts to obtain third-party verification.

For additional income verification procedure and process, please refer to section III of this chapter.

#### **4) Assessment of Need**

An initial evaluation of need must be conducted prior to providing assistance to determine the amount and types of assistance the individual or family needs to gain or regain stability in permanent housing. The intake worker must document their assessment and detail their decision for determining need.

Certification or other written documentation that the household lacks the resources and support networks to obtain permanent housing must also be included as part of the assessment.

Re-evaluation for homelessness prevention and rapid re-housing assistance. 24 CFR § 576.401(b): (1) a program participant's eligibility including the types and amounts of assistance under the homeless prevention component must be re-evaluated once every three months; and 2) a program participant's eligibility including the types and amounts of assistance under the rapid-rehousing assistance component must be re-evaluated not less than every three (3) months.

1. For the purposes of the COR ESG program, the households' needs will be case managed monthly and income will be re-evaluated every three (3) months.

## B. DENIAL OF ASSISTANCE

Any applicant determined ineligible through the initial assessment or subsequent process will be notified in writing. An applicant will be given the opportunity to request an informal review in accordance with the procedures in section VI of this chapter.

The COR or subgrantees may deny applicant assistance if:

The applicant does not meet the current definition of homelessness as defined by HUD either for homeless prevention or rapid re-housing.

The applicant is unable to sufficiently document their homeless status.

The applicant does not have a tie to City of Rockford.

The household income is over 30% area median income.

An alternative program better suits their current needs.

The applicant is unable to locate suitable housing after searching for 6 months.

Ineligibility does not bar the individual or family household from being referred at a later date.

## CHAPTER IV/SECTION III

### VERIFICATION OF ANNUAL INCOME

Annual income is used to determine program eligibility and the level of assistance the household will receive.

To determine the annual income of an individual or family household, ESG regulation requires the use of calculating income standards under 24 CFR 5.609. The annual income definition found at 24 CFR Part 5 is used by a variety of federal programs including Housing Choice Voucher (Section 8), Public Housing, and the Low-Income Housing Tax Credit Program.

#### A. DEFINITION OF ANNUAL INCOME

The Part 5 definition of *annual (gross) income* is the gross amount, monetary or not, which go to or on behalf of the individual or family household that is anticipated to be received during the coming 12-month period. Annual income also includes amounts derived from assets.

*Gross Amount* is before any deductions have been taken.

*Anticipated to be received* is a projection forward of future earnings or benefits over 12 months to determine a household's expected ability to pay.

## B. TYPES OF INCOME TO COUNT

There are some “inclusions” on types of income to be counted and “exclusions” on types of income that are not considered.

### 1) Part 5 Inclusions

This table presents the Part 5 income inclusions to be counted to determine annual income:

General Category	
1. Income from wages, salaries, tips, etc.	The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services.
2. Business Income	The net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight-line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family
3. Interest & Dividend Income	Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation is permitted only as authorized in number 2 (above). Any withdrawal of cash or assets from an investment will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested by the family. Where the family has net family assets in excess of \$5,000, annual income shall include the greater of the actual income derived from all net family assets or a percentage of the value of such assets based on the current passbook savings rate, as determined by HUD.
4. Retirement & Insurance Income	The full amount of periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts, including a lump-sum amount or prospective monthly amounts for the delayed start of a periodic payment (except for certain exclusions, listed in Income Exclusions, number 14)
5. Unemployment & Disability Income	Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation and severance pay (except for certain exclusions, listed in Income Exclusions, number 3)
6. Welfare Assistance.	<p>Welfare assistance payments made under the Temporary Assistance for Needy Families (TANF) or in Minnesota (MFIP, GA, &amp; MSA) program are included in annual income:</p> <ul style="list-style-type: none"> <li>• Qualify as assistance under the TANF program definition at 45 CFR 260.31; and</li> <li>• Are otherwise excluded from the calculation of annual income per 24 CFR 5.609(c).</li> </ul> <p>If the welfare assistance payment includes an amount specifically designated for shelter and utilities that is subject to adjustment by the welfare assistance agency in accordance with the actual cost of shelter and utilities, the amount of welfare assistance income to be included as income shall consist of:</p> <p>the amount of the allowance or grant exclusive of the amount specifically designated for shelter or utilities;</p> <p><b>plus:</b></p> <p>the maximum amount that the welfare assistance agency could in fact allow the family for shelter and utilities. If the family welfare assistance is reduced from the standard of need by applying a percentage, the amount calculated under 24 CFR 5.609 shall be the amount resulting from one application of the percentage.</p>
7. Alimony, Child Support, & Gift Income	Periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from organizations or from persons not residing in the dwelling.
8. Armed Forces Income	All regular pay, special pay, and allowance of a member of the Armed Forces (except as provided in number 8 of Income Exclusions).

## 2) **Part 5 Exclusions**

This table presents the Part 5 income exclusions not to be counted to determine annual income:

	Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member.
1. Income of Children	Income from employment of children (including foster children) under the age of 18 years.
2. Foster Care Payments	Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the tenant family, who are unable to live alone).
3. Inheritance and Insurance Income	Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains, and settlement for personal or property losses (except for certain exclusions, listed in Income Inclusions, number 5).
4. Medical Expense Reimbursements	Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member.
5. Income of Live-in Aides	Income of a live-in aide (as defined in 24 CFR 5.403).
6. Income from a Disabled Member	Certain increase in income of a disabled member of qualified families residing in HOME-assisted housing or receiving HOME tenant- based rental assistance (24 CFR 5.671 (a)).
7. Student Financial Aid	The full amount of student financial assistance paid directly to the student or to the educational institution.
8. "Hostile Fire" Pay	The special pay to a family member serving in the Armed Forces who is exposed to hostile fire.
9. Self-Sufficiency Program Income	<ul style="list-style-type: none"> <li>a. Amounts received under training programs funded by HUD.</li> <li>b. Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS).</li> <li>c. Amounts received by a participant in other publicly assisted programs that are specifically for, or in reimbursement of, out-of-pocket expenses incurred (special equipment, clothing, transportation, childcare, etc.) and which are made solely to allow participation in a specific program.</li> <li>d. Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time.</li> <li>e. Incremental earnings and benefits resulting to any family member from participation in qualifying state or local employment training programs (including training not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for the period during which the family member participates in the employment-training program.</li> </ul>
10. Gifts	Temporary, nonrecurring, or sporadic income (including gifts).
11. Reparation Payments	Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era.
12. Income from Full-time Student	Earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of household or spouse).
13. Adoption Assistance Payments	Adoption assistance payments in excess of \$480 per adopted child.
14. Social Security & SSI Income	Deferred periodic amounts from supplemental security income and social security benefits that are received in a lump sum amount or in prospective monthly amounts
15. Property Tax Refunds	Amounts received by the family in the form of refunds or rebates under state or local law for property taxes paid on the dwelling unit.
16. Home Care Assistance	Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep this developmentally disabled family member at home

<p>17. Other Federal Exclusions</p>	<p>Amounts specifically excluded by any other Federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions set forth in 24 CFR 5.609(c) apply. A notice will be published in the Federal Register and distributed to housing owners identifying the benefits that qualify for this exclusion. Updates will be published and distributed when necessary. The following is a list of income sources that qualify for that exclusion:</p> <ul style="list-style-type: none"> <li>✦ The value of the allotment provided to an eligible household under the Food Stamp Act of 1977;</li> <li>✦ Payments to volunteers under the Domestic Volunteer Service Act of 1973 (employment through AmeriCorps, VISTA, Retired Senior Volunteer Program, Foster Grandparents Program, youthful offender incarceration alternatives, senior companions);</li> <li>✦ Payments received under the Alaskan Native Claims Settlement Act;</li> <li>✦ Income derived from the disposition of funds to the Grand River Band of Ottawa Indians;</li> <li>✦ Income derived from certain submarginal land of the United States that is held in trust for certain Indian tribes;</li> <li>✦ Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program.</li> <li>✦ Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721);</li> <li>✦ The first \$2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the U.S. Claims Court and the interests of individual Indians in trust or restricted lands, including the first \$2,000 per year of income received by individual Indians from funds derived from interests held in such trust or restricted lands;</li> <li>✦ Amounts of scholarships funded under Title IV of the Higher Education Act of 1965, including awards under the Federal work-study program or under the Bureau of Indian Affairs student assistance programs;</li> <li>✦ Payments received from programs funded under Title V of the Older Americans Act of 1985 (Green Thumb, Senior Aides, Older American Community Service Employment Program);</li> <li>✦ Payments received on or after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in the <u>In Re Agent Orange</u> product liability litigation, M.D.L. No. 381 (E.D.N.Y.); Earned income tax credit refund payments received on or after January 1, 1991, including advanced earned income credit payments;</li> <li>✦ The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990;</li> <li>✦ Payments received under programs funded in whole or in part under the Job Training Partnership Act (employment and training programs for Native Americans and migrant and seasonal farm workers, Job Corps, veterans employment programs, state job training programs and career intern programs, AmeriCorps).</li> <li>✦ Payments by the Indians Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation;</li> <li>✦ Allowances, earnings, and payments to AmeriCorps participants under the National and Community Services Act of 1990;</li> <li>✦ Any allowance paid under the provisions of 38 U.S.C. 1805 to a child suffering from spina bifida who is the child of a Vietnam veteran;</li> <li>✦ Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act; and</li> <li>✦ Allowances, earnings, and payments to individuals participating in programs under the Workforce Investment Act of 1998.</li> </ul>
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### C. HOUSEHOLD MEMBERS INCOME TO COUNT

All adult household members living in the household (including those that may be temporarily absent) must have their income counted towards the annual income of the household

Additionally, dependent members (child 17 or under; Full-time student over 18) for which benefits are provided are also included in annual income.

This chart summarizes whose income to count under Part 5:		
<b>Persons Counted in Household Size for the Purposes of Eligibility Calculation</b>	<b>Employment Income</b>	<b>Other Income</b> (Including income from Assets)
Head of Household	Yes	Yes
Spouse	Yes	Yes
Co-Head of Household	Yes	Yes
Other Adult	Yes	Yes
Dependents		
o Child 17 or under	No	Yes
o Full-time Student 18 and over	See Note	Yes
<b>Nonmembers</b>		
<b>Not counted</b>		
Foster Adult	No	No
Foster Child 18 or under	No	No
Live-in Aide	No	No
<b>NOTE:</b> Only count the first \$480 of earned income of a full-time student (enrolled for 12 or more units) older than 18 who is a dependent. Full time student status must be verified and documented in the file.		



Special consideration is given to income earned by the following groups of people:

**Minors.** Earned income of minors is not counted. However, unearned income attributable to a minor (e.g., child support, welfare payments and other benefits paid on behalf of a minor) is included.

**Foster Children and Adults.** These persons are not included in the household member count. Also, since the foster children/adults are not counted as household members, the income received to care for these individuals is not included in the household income.

**Live-In Aides.** If a household includes a paid live-in aide (whether paid by the household or a social service program), the income of the live-in aide, regardless of the source, is not counted. Except under unusual circumstances, a related person does not qualify as a live-in aide.

**Persons with Disabilities.** During the annual recertification of a household's income, Grantees are required to exclude from annual income certain increases in the income of a disabled member of qualified families residing in HOME-assisted housing or receiving HOME tenant-based rental assistance. This will be discussed in detail in Chapter Four.

**Temporarily Absent Household Members.** The income of temporarily absent household members is counted in the Part 5 definition of annual income – regardless of the amount the absent member contributes to the household. For example, a construction worker employed at a temporary job on the other side of the state earns \$600 per week. He keeps \$200 per week for expenses and sends \$400 per week home to his family. The entire amount (\$600 per week) is counted in the family's income.

**Adult Students Living Away from Home.** If the adult student is counted as a member of the household in determining the household size (to compare to the HUD income limits), the first \$480 of the student's income must be counted in the household's income. Note, however, that the \$480 limit does not apply to a student who is the head of household or spouse (their full income must be counted). To count the adult student as a household member, the adult student would need to be verified as a dependent, usually on the parent's tax return. Additionally, student status must be verified with documentation in the file.

**Permanently Absent Household Members.** If a household member is permanently absent from the household (e.g., a spouse who is in a nursing home), the head of household has the choice of either counting that person as a member of the household, and including income attributable to that person as household income, or specifying that the person is no longer a member of the household.

\* If the household member is specified as being no longer a member, that member is not allowed to live in the assisted unit if short or medium term rental assistance is being provided.

## D. TREATMENT OF ASSETS

There is no asset limitation for participation in any ESG funded activity. Income from assets (interest and dividends) is however included as part of annual income under the Part 5 definition.

In general terms, an asset is a cash or non-cash item that can be converted to cash. Household assets in excess of \$5,000, annual income shall include the greater of the actual income derived from all net family assets or a percentage of the value of such assets based on the current passbook savings rate, as determined by HUD.

### 1) Part 5 Inclusions

This table presents the Part 5 asset inclusions to be counted to determine annual income:

#### Inclusions

1. Cash held in savings accounts, checking accounts, safe deposit boxes, homes, etc. For savings accounts, use the current balance. For checking accounts, use the average 6-month balance. Assets held in foreign countries are considered assets.
2. Cash value of revocable trusts available to the applicant.
3. Equity in rental property or other capital investments. Equity is the estimated current market value of the asset less the unpaid balance on all loans secured by the asset and all reasonable costs (e.g., broker fees) that would be incurred in selling the asset. Under HOME, equity in the family's primary residence is not considered in the calculation of assets for owner-occupied rehabilitation projects.
4. Cash value of stocks, bonds, Treasury bills, certificates of deposit and money market accounts.
5. Individual retirement, 401(K), and Keogh accounts (even though withdrawal would result in a penalty).
6. Retirement and pension funds.
7. Cash value of life insurance policies available to the individual before death (e.g., surrender value of a whole life or universal life policy).
8. Personal property held as an investment such as gems, jewelry, coin collections, antique cars, etc.
9. Lump sum or one-time receipts, such as inheritances, capital gains, lottery winnings, victim's restitution, insurance settlements and other amounts not intended as periodic payments.
10. Mortgages or deeds of trust held by an applicant.

## 2) Part 5 Exclusions

This table presents the Part 5 asset inclusions not to be counted to determine annual income:

### Exclusions

- 1) Necessary personal property, except as noted in number 8 of Inclusions, such as clothing, furniture, cars and vehicles specially equipped for persons with disabilities.
- 2) Interest in Indian trust lands.
- 3) Assets not effectively owned by the applicant. That is, when assets are held in an individual's name, but the assets and any income they earn accrue to the benefit of someone else who is not a member of the household and that other person is responsible for income taxes incurred on income generated by the asset.
- 4) Equity in cooperatives in which the family lives.
- 5) Assets not accessible to and that provide no income for the applicant.
- 6) Term life insurance policies (i.e., where there is no cash value).

**Assets that are Part of an Active Business.** "Business" does not include rental of properties that are held as an investment and not a main occupation.

## CHAPTER IV/SECTION IV

### DETERMINATION OF PARTICIPANT SHARE

ESG funds may be used to pay housing owners/property management, utility companies and other third parties for what are considered financial assistance costs. Below details how a participant would either share in the cost or what financial assistance is available.

A. LENGTH OF RENTAL ASSISTANCE (see Attachment B)

B. COMPUTATION OF PARTICIPANT SHARE OR PORTION

Households will be required to contribute a 30% of their Gross Monthly income towards their rent. This is considered to be the participant's share or portion of the rent.

All income, assets and expenses will be verified. The computation will follow the regulation under 24 CFR 5.609 as detailed in Section III. A household's annual income will be re-evaluated every six (6) months.

A household is not required to report changes in income until their next semi-annual re-evaluation. If a household does report a decrease in income, an adjustment to the tenant share will be conducted to be effective the month following the report of the change.

#### C. RENTAL APPLICATION FEES

ESG funding may be used to pay for an eligible participant's rental application fee. It is limited to three (3) application fees or up to \$150, whichever is less in a 12 month period.

#### D. SECURITY DEPOSIT

Security deposit assistance is available through the ESG program to ESG eligible recipients. Assistance will be limited to once (1) every 12 months.

#### E. LAST MONTH RENT

Payment for last month's rent is available to ESG eligible recipients but it cannot exceed one (1) month's rent and is included in the total rental assistance cap of 24 months.

A last month's rent payment cannot be provided or combined with any other federal program. Assistance will be limited to once (1) in every 12 months.

#### F. SPECIAL CONDITIONS

A landlord may be reimbursed up to one month rent value for damage above level of rental Deposit with proper documentation.

#### G. RENTAL ARREARS

Payment of rental arrears to allow an ESG recipient to access rental assistance in a new unit will be available but on a case by case basis.

Service costs are also eligible for funding under ESG. Below details the services that will be provided:

#### H. HOUSING SEARCH AND PLACEMENT

Services to assist with the assessment of housing barriers, the development of an action plan to locate housing, outreach and negotiation with landlords and owners will be an eligible service to be pay for with ESG funding.

An evaluation of progress will be conducted every three (3) months. Specifically assisting a household to search for housing can be provided up to 6 months. If a household is unable to locate suitable housing within 6 months, search assistance will be terminated.

#### I. HOUSING STABILITY CASE MANAGEMENT

ESG funds may be used to pay the cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtain housing This assistance cannot

exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent.

#### J. MEDIATION

Mediation between a tenant and owners will be an eligible service to use ESG funding for at this time but no more one time per month while housed.

#### K. LEGAL SERVICES

Legal services will not be an eligible service to use ESG funding for at this time.

#### L. CREDIT REPAIR

Credit counseling will not be an eligible service to use ESG funding for at this time.

### **CHAPTER IV/SECTION V**

### **UNIT SELECTION AND CONTINUED ASSISTANCE REQUIREMENTS**

#### A. CASE MANAGEMENT

Any ESG rental assistance recipient must meet with their case manager at a minimum of once (1) per month. More frequent appointments can be made as seen fit for the individual household.

The purpose of case management is to:

1. Help the participant receive appropriate supportive services.
2. Help the participant obtain other federal, state, and local assistance.
3. Help the participant to develop a plan and set goals to retain permanent housing once the assistance expires.
4. Oversee the progress of goal attainment to sustain permanent housing after assistance has expired.

A case manager will make three attempts per month to set up an appointment with the participants and will record attempts in case notes. Clients are strongly encouraged to participate in case management to make progress on goals.

#### B. UNIT SELECTION

Once the ESG recipient has been approved and determined to be eligible for rental assistance, the household must select a unit that is:

1. Within the Fair Market Rent (FMR) for the unit size. A household is NOT permitted to rent a single-room.
2. The unit is located within the City of Rockford. A legally binding lease will be entered into by the participant and owner
4. An inspection of the unit meets the housing standards of the ESG Program
5. The unit must also be determined to be rent reasonable for the area.

If the household is unable to secure a unit after three (3) months, the household must be re-evaluated for income and need. After an additional three (3), if the household has still not found suitable housing, the household will be deemed ineligible.

#### C. RENT REASONABLENESS

The standard HUD has adopted and must be enforced under ESG is the total rent charged for a unit must be reasonable in relation to the rents being charged during the same period for comparable units in the private, unassisted market and must not be in excess of rents being charged during the same period for comparable non-luxury unassisted units.

The rent reasonableness of the unit can be evaluated in the COR by one of the following approved methods:

1. Use of Rentometer; <https://www.rentometer.com/>
2. Evaluation of three unit rents in the area

#### D. UNIT INSPECTION

The unit will need to be inspected prior to rental assistance commencing subject to the ESG program shelter and housing standard regulations 24 CFR 576.403. Thereafter the unit must be inspected annually.

#### E. CONTRACT EXECUTION

A housing assistance payment (HAP) contract will be executed with the owner/manager of the property in which the ESG rental assistance recipient will reside in the selected unit. The contract will outline the rent for the term of the lease, the term of the contract (matching the lease), the address or room number of the assisted unit, the portion of rent the tenant will be responsible to pay and the assisted amount paid with ESG funds.

The contract should be executed prior to beginning of assistance. The COR's portion of the rent assistance for participants receiving ESG Rental Assistance terminates automatically and no further rental assistance payment can be made if:

1. The participant moved out of the assisted unit;
2. The lease was terminated or not renewed by either party;
3. The participant becomes ineligible to receive ESG rental assistance.

## **CHAPTER IV/SECTION VI**

### **TERMINATION OF BENEFITS**

The following process will occur should a participant receiving shelter, rental assistance or housing relocation and stabilization services have their assistance terminated:

- 1) A written notice to the program participant containing a clear statement of the reasons for termination.
- 2) A review of the decision, in which the participant is given the opportunity to present written or oral objections before a person other than the person who approved the termination decision.
- 3) Written notice of the final decision to the program participant after a grievance has been made.

A case manager will make three attempts to deliver the written notice if the notice is returned and will document each attempt.

Termination does not bar the participant household from receiving ESG assistance at a later date for the same family or individual. If termination does occur, a household would be eligible for assistance again after 12 months from the final month that assistance was provided. The COR has not set a lifetime limit in which an individual household or family can receive assistance.

#### **A. MAXIMUM LIMIT ON ASSISTANCE**

The maximum limit on rental assistance will be 24 months in a 3 year period.

#### **B. TERMINATION AS A RESULT OF INCOME**

While receiving a subsidy under ESG Rental Assistance Program if the participant at re-evaluation has an income that exceeds 30% of AMI, the assistance must be terminated. Termination of assistance will be effective the 1<sup>st</sup> of the month after a 30 day notice has been provided to the participant and owner in cases where rental assistance is being provided.

#### **C. TERMINATION FOR MULTIPLE LEASE VIOLATIONS**

If while receiving a subsidy under ESG Rental Assistance Program the participant is evicted or forced to move as a result of multiple lease violations, the participant's rental assistance may be terminated. Multiple lease violations can include but are not limited to: skipping from the unit, drug activity, unauthorized household members, non-payment of rent or tenant paid utilities.

#### D. TERMINATION FOR NON-COMPLIANCE (Shelter and Rental Unit)

While receiving a subsidy under ESG Rental Assistance Program if the participant fails to provide requested information, the participant's rental assistance is subject to termination for non-compliance with the program regulations.

#### E. TERMINATION AS A RESULT OF ABSENCE FROM A UNIT FOR MORE THAN 90 DAYS

While receiving a subsidy under ESG Rental Assistance Program if the participant is absent from their assisted unit for more than 90 consecutive days, the participant's rental assistance must be terminated.

#### F. PROHIBITION OF DUPLICATE SUBSIDIES

While receiving a subsidy under ESG Rental Assistance Program, participants may not participate in any other federal assisted housing programs (see definition below). The participant must use the assisted unit as their sole residence and may not receive any duplicate housing subsidies for their unit or another housing unit. Acceptance of an on-going stipend from an outside party in order to pay the minimum rent required for the program is not considered a duplicate subsidy.

*Federally assisted housing* means housing assisted under any of the following programs:

(1) Public housing;

(2) Housing receiving project-based or tenant-based assistance under Section 8 of the U.S. Housing Act of 1937 (42 U.S.C. 1437f);

(3) Housing that is assisted under section 202 of the Housing Act of 1959, as amended by section 801 of the National Affordable Housing Act (12 U.S.C. 1701q);

(4) Housing that is assisted under section 202 of the Housing Act of 1959, as such section existed before the enactment of the National Affordable Housing Act;

(5) Housing that is assisted under section 811 of the National Affordable Housing Act (42 U.S.C. 8013);

(6) Housing financed by a loan or mortgage insured under section 221(d)(3) of the National Housing Act (12 U.S.C. 1715/(d)(3)) that bears interest at a rate determined under the proviso of section 221(d)(5) of such Act (12 U.S.C. 1715/(d)(5));

(7) Housing insured, assisted, or held by HUD or by a State or local agency under section 236 of the National Housing Act (12 U.S.C. 1715z-1); or



(8) Housing assisted by the Rural Development Administration under section 514 or section 515 of the Housing Act of 1949 (42 U.S.C. 1483, 1484).

#### G. PROHIBITION OF PORTABILITY

The ESG Rental Assistance Program provides rent subsidies only for eligible households residing in the City of Rockford.

The subsidy is not transferrable to any other housing unit without prior approval. The COR's portion of the rent assistance for participants receiving ESG Rental Assistance terminates automatically upon vacating the assisted unit.

## **CHAPTER IV/SECTION VII GRIEVANCE PROCEDURES**

### A. INFORMAL REVIEWS FOR APPLICANTS

1. The COR/Subrecipient will provide applicants with the opportunity for an informal review of decisions denying:
  - a. Participation in the program
2. Informal reviews are not required for established policies and procedures such as:
  - a. Determination that a unit's rent is more than the FMR;
  - b. The unit does not pass inspection or;
  - c. The unit is deemed not rent reasonable.
3. Denial notice will describe:
  - a. The reasons for the decision
  - b. The family's right to informal review
  - c. The procedures and time frames for obtaining a review

### B. INFORMAL HEARING FOR PARTICIPANTS

1. The COR/Subrecipient will give the program participant an opportunity for an informal hearing to consider whether decisions relating to the individual circumstances of the participant are in accordance with law and COR/Subrecipient rules in the following cases:
  - a. A determination of the computation of the amount of housing assistance payment to the participant.
  - b. A decision to deny or terminate assistance on behalf of the participant.

Written notice of these determinations by the COR/Subrecipient will state that if the participant does not agree with the decision, they may request an informal hearing on the decision within fourteen (14) calendar days of the date of mailing.

A case manager will make three attempts to deliver the written notice if the notice is returned and will document each attempt.<sup>2</sup> Informal hearings are not required for established policies and procedures such as:

- a. Maximum term of 24-month subsidy is reached
  - b. Refusal to attend/participate in case management
3. The guidelines for the informal hearing include:
- a. Any person or persons designated by the COR/Subrecipient, other than the person who made or approved the decision under review or a subordinate of that person, will conduct the hearing.
  - b. At his or her own expense, a lawyer or other representative may represent the participant.
  - c. The COR/Subrecipient and the participant will have the opportunity to present evidence and question any witnesses.
  - d. The person who conducts the hearing shall issue a written decision, stating briefly the reasons for the decision, within fourteen (14) calendar days of the hearing. The participant promptly receives a copy of the hearing decision.

## **CHAPTER V**

### **HMIS §576.103**

Under this component, ESG funds may be used for ESG grantees and subrecipients' participation in the HMIS collection and analyses of data on individuals and families who are homeless and at- risk of homelessness.

Eligible costs under ESG include:

- Contributing data to the HMIS designated by the CoC
- Costs for managing the HMIS system
- Costs of operating Single Point of Entry (SPOE) related to HMIS entry and wait lists.

## **CHAPTER VI**

### **OTHER FEDERAL REQUIREMENTS**

#### **A. NONDISCRIMINATION AND EQUAL OPPORTUNITY REQUIREMENTS**

Federal law prohibits housing discrimination based on race, color, national origin, religion, sex, familial status, or disability. Eligibility for ESG assistance will be based upon the criteria noted in the various chapters and made available without regard to race, color, national origin, religion, to actual or perceived sexual orientation, gender identity, familial or marital status, or disability.

#### **B. PROHIBITION OF INQUIRIES ON SEXUAL ORIENTATION OR GENDER IDENTITY**

For the purpose of determining eligibility for ESG assistance or otherwise making such housing available, the COR prohibits inquiries regarding sexual orientation or gender identity. It does not prohibit any individual from voluntarily self-identifying sexual orientation or gender identity.

Prohibition on inquiries does not prohibit lawful inquiries of an applicant or occupant's sex where the housing provided or to be provided to the individual is temporary, emergency shelter that involves the sharing of sleeping areas or bathrooms, or inquiries made for the purpose of determining the number of bedrooms to which a household may be entitled.

#### **C. DEBARRED, SUSPENDED, OR INELIGIBLE CONTRACTORS AND PARTICIPANTS**

The prohibitions at 2 CFR part 2424 on the use of debarred, suspended, or ineligible contractors and participants.

## **CHAPTER VII**

### **REPORTING AND RECORD KEEPING**

As indicated in other sections, documentation must be collected and maintained in a participant file for compliance with ESG regulations. Records of payment and program participant records must be maintained for a minimum five (5) years after all funds from the fiscal year of ESG funds were expended.

The COR/Subrecipient will collect the following information for each participant file (dependent upon assistance being provided) and will use the provided checklist in each ESG participant file.

- Referral (Either from Coordinated Assessment or Service Provider)
- Program eligibility determination
  - Proof of homelessness
    - written observation of outreach worker, or
    - written referral by another housing or service provider, or
    - certification by head of household seeking assistance
- Signed program participant agreement
- Completed HMIS assessment and release form
- Proof of client annual income and documentation for determination of income
- Lease documentation
- Certification of Fair Market Rent (FMR) and rent reasonableness
- Completed Habitability Inspection form
- Lead based paint notification
- Housing Assistance Payment Contract
- Case management – once per month
- Case plan to assist the program participant to retain permanent housing after the ESG assistance ends
- Date of re-evaluation of program eligibility and result of eligibility determination
  - Income cannot exceed 30% of AMI upon re-evaluation of eligibility
  - Participant continues to lack sufficient resources to retain housing without ESG funds

## **CHAPTER VIII**

### **STANDARDS FOR PROGRAM EVALUATION**

Subrecipient will be monitored by the City of Rockford for compliance with these rules and HUD ESG administrative rules.

## **CHAPTER IX**

### **STANDARDS FOR MAKING SUBAWARDS**

An application will require information regarding the services an organization would be able to provide, the cost of such services and a budget for all program expenditures.

A request for proposals will be distributed as widely as possible. An announcement will go to all local agencies currently providing emergency shelter services and homelessness prevention and rapid re-housing services and to all participants in the Continuum of Care. A Media Release will be submitted to all local media within the area covered by the Continuum of Care. A service announcement will be placed on the COR website, the Continuum of Care/Rock River Valley Homeless Coalition website and through the COR social media postings.

A due date for applications shall be clearly publicized along with the request for proposals. All potential applicants will be given approximately four weeks after the initial announcement to submit their applications. Potential applicants will be provided with all requirements and responsibilities to be assumed with receipt of sub-awards.

Applications will be reviewed by the ESG Committee comprised of COR staff and CoC representatives. Applications will be reviewed with respect to applicants' abilities to provide shelter services or homelessness prevention and rapid re-housing services under the guidelines set forth by HUD and by the COR.

The ESG Committee will recommend the most qualified service provider(s). This recommendation will be presented to the Rockford City Council seeking their approval or denial. If approved, the COR will enter into contract with the approved applicant(s).

**City of Rockford**

**2024 Annual Action Plan**

**Grantee SF-424's and Certifications**

- **SF-424 CDBG**
- **SF-424D CDBG**
- **SF-424 HOME**
- **SF-424 HOME – Revised 7.25.2024**
- **SF-424D HOME**
- **SF-424 ESG**
- **SF-424D ESG**
- **Certifications**

### Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

7-8-2024

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

36-6006082

**5b. Federal Award Identifier:**

B24-MC-17-0020

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

City of Rockford

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

36-6006082

**\* c. UEI:**

MPDSB2MNNM19

**d. Address:**

**\* Street1:**

425 E. State St.

**Street2:**

**\* City:**

Rockford

**County/Parish:**

**\* State:**

IL: Illinois

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

61104-1014

**e. Organizational Unit:**

**Department Name:**

Community & Economic Develop

**Division Name:**

Neighborhood Development

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

Ms.

**\* First Name:**

Sarah

**Middle Name:**

**\* Last Name:**

Leys

**Suffix:**

**Title:** Deputy Director, Community & Economic Develop

**Organizational Affiliation:**

**\* Telephone Number:**

779-348-7442

**Fax Number:**

**\* Email:**

Sarah.LeyS@Rockfordil.gov

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

Community Development Block Grant (CDBG) / Entitlement Grants

### \* 12. Funding Opportunity Number:

n/a

\* Title:

n/a

### 13. Competition Identification Number:

n/a

Title:

n/a

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

The fiscal year 2024 Annual Action Plan for the Community Development Block Grant (CDBG) / Entitlement Grant

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments



**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="2,219,358.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="1,932,893.00"/>
* f. Program Income	<input type="text" value="2,000.00"/>
* g. TOTAL	<input type="text" value="4,154,251.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
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**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

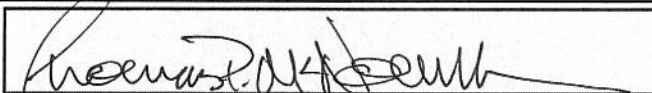
Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: 

\* Signature of Authorized Representative:

\* Date Signed:

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

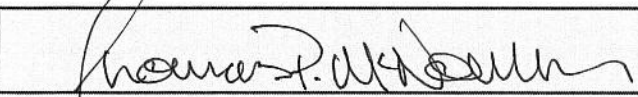
**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Rockford	DATE SUBMITTED 7-8-2024

### Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

7-8-2024

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

36-6006082

**5b. Federal Award Identifier:**

M24-MC-17-0208

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

City of Rockford

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

36-6006082

**\* c. UEI:**

MPDSB2MNM19

**d. Address:**

**\* Street1:**

425 E State St

**Street2:**

**\* City:**

Rockford

**County/Parish:**

**\* State:**

IL: Illinois

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

61104-1014

**e. Organizational Unit:**

**Department Name:**

Community & Economic Develop

**Division Name:**

Neighborhood Development

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

Ms.

**\* First Name:**

Sarah

**Middle Name:**

**\* Last Name:**

Leys

**Suffix:**

**Title:**

Deputy Director, Community & Economic Develop

**Organizational Affiliation:**

**\* Telephone Number:**

779-348-7442

**Fax Number:**

**\* Email:**

Sarah.Leyes@RockfordIL.gov

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.239

CFDA Title:

HOME Investment Partnerships Program (HOME)

**\* 12. Funding Opportunity Number:**

n/a

\* Title:

n/a

**13. Competition Identification Number:**

n/a

Title:

n/a

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

The fiscal year 2024 Annual Action Plan for the HOME Investments Partnerships Program (HOME)

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**

\* a. Applicant 16th

\* b. Program/Project 16th

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date: 01/01/2024

\* b. End Date: 12/31/2024

**18. Estimated Funding (\$):**

* a. Federal	928,634.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	3,801,398.00
* f. Program Income	0.00
* g. TOTAL	4,730,032.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
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**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

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**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix: Mr. \* First Name: Thomas

Middle Name: P.

\* Last Name: McNamara

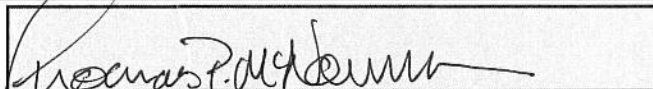
Suffix:

\* Title: Mayor, City of Rockford

\* Telephone Number: 779-348-7150 Fax Number: 

\* Email: Thomas.McNamara@RockfordIL.gov

\* Signature of Authorized Representative:



\* Date Signed: 7-8-2024



### Application for Federal Assistance SF-424

\* 1. Type of Submission:

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

\* 2. Type of Application:

- ☒ New  
☐ Continuation  
☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

7/23/2024

4. Applicant Identifier:

5a. Federal Entity Identifier:

36-6006082

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\* c. UEI:

MPDSB2MNM19

#### d. Address:

\* Street1:

425 E State St

Street2:

\* City:

Rockford

County/Parish:

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IL: Illinois

Province:

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USA: UNITED STATES

\* Zip / Postal Code:

61104-1014

#### e. Organizational Unit:

Department Name:

Community & Economic Develop

Division Name:

Neighborhood Development

#### f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Ms.

\* First Name:

Sarah

Middle Name:

\* Last Name:

Leys

Suffix:

Title: Deputy Director, Community & Economic Develop

Organizational Affiliation:

\* Telephone Number: 779-348-7442

Fax Number:

\* Email: Sarah.Lays@RockfordIL.gov

## Application for Federal Assistance SF-424

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C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

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### \* 12. Funding Opportunity Number:

n/a

\* Title:

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### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

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Middle Name: P.

\* Last Name: McNamara

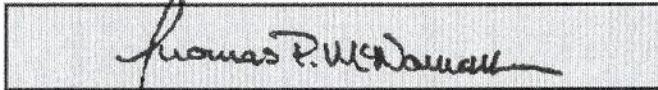
Suffix:

\* Title: Mayor, City of Rockford

\* Telephone Number: 779-348-7150 Fax Number: 

\* Email: Thomas.McNamara@RockfordIL.gov

\* Signature of Authorized Representative:



\* Date Signed: 7/25/2024

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2025

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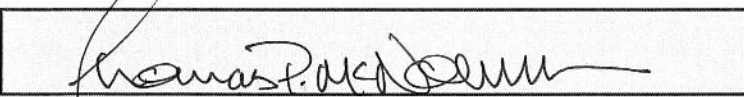
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8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Rockford	7-8-2024

### Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

7-8-2024

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

36-6006082

**5b. Federal Award Identifier:**

E24-MC-17-0020

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

City of Rockford

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

36-6006082

**\* c. UEL:**

MPDSB2MNNM19

**d. Address:**

**\* Street1:**

425 E State St

**Street2:**

**\* City:**

Rockford

**County/Parish:**

**\* State:**

IL: Illinois

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

61104-1014

**e. Organizational Unit:**

**Department Name:**

Community & Economic Develop

**Division Name:**

Neighborhood Development

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

Ms.

**\* First Name:**

Sarah

**Middle Name:**

**\* Last Name:**

Leys

**Suffix:**

**Title:** Deputy Director, Community & Economic Develop

**Organizational Affiliation:**

**\* Telephone Number:**

779-348-7442

**Fax Number:**

**\* Email:**

Sarah.LeyS@RockfordIL.gov



## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

14.231

CFDA Title:

Emergency Solutions Grant Program

### \* 12. Funding Opportunity Number:

n/a

\* Title:

n/a

### 13. Competition Identification Number:

n/a

Title:

n/a

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

The fiscal year 2024 Annual Action Plan for the Emergency Solutions Grant (ESG) program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="192,497.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="200,978.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="393,475.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

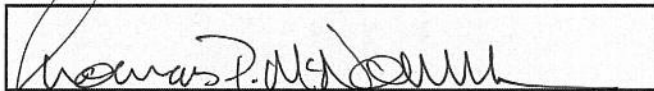
Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: 

\* Signature of Authorized Representative:

\* Date Signed:

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

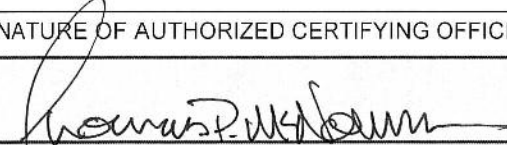
**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
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15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
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17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Rockford	7-8-2024



## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

  
Signature of Authorized Official

7-8-2024  
Date

Mayor - City of Rockford

Title

## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2023, 2024 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

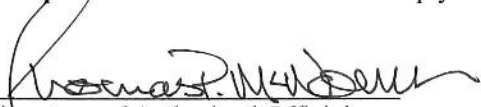
**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** -- It will comply with applicable laws.

  
Signature of Authorized Official

7-8-2024  
Date

Mayor - City of Rockford

\_\_\_\_\_  
Title

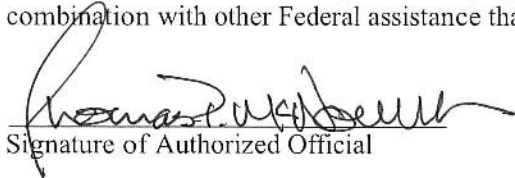
## Specific HOME Certifications

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

  
Signature of Authorized Official

7-8-2024  
Date

Mayor - City of Rockford

\_\_\_\_\_  
Title

## **Emergency Solutions Grants Certifications**

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

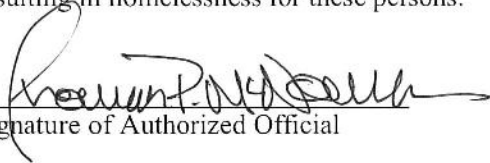
**Matching Funds** – The recipient will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

**Discharge Policy** – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

  
Signature of Authorized Official

7-8-2024  
Date

Mayor - City of Rockford

\_\_\_\_\_  
Title

## **APPENDIX TO CERTIFICATIONS**

### **INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

#### **Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.