

2021 Annual Action Plan & Amendments HUD submittal timeline		
Document	Submittal Date	Reason for Amendment, if applicable
Annual Action Plan	April 2021	NA
Amendment 1 (Minor)	June 2021	HUD increased the 2021 CDBG grant by \$32,596
Amendment 2 (Minor)	August 2021	HUD issued updated Certifications to include as part of the Plan.
Amendment 3 (Substantial)	March 2022	This includes the Infrastructure Substantial Amendment; re-allocation of \$625,000 in CDBG funds from Housing Rehabilitation and \$125,000 in CDBG Economic Development funds to Infrastructure.

Executive Summary

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

1. Introduction

The City of Rockford, Illinois is an entitlement community under the U.S. Department of Housing & Urban Development's (HUD) Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG). In compliance with the HUD regulations, the City of Rockford (City) has prepared this FY 2021 Annual Action Plan (AAP) for the period of January 1, 2021 through December 31, 2021. This AAP is the 2nd 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.

The 2021 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 2021:

- 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 - 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.
- HS-3 Homeownership - Assists 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.
- HS-4 Fair Housing - Promotes fair housing choice through education, training, testing, 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 - Improve the public infrastructure through rehabilitation, reconstruction, and new construction, of streets, sidewalks, bridges, curbs, walkways, water, storm water, sanitary sewer, handicap accessibility improvements/removal of architectural barriers, etc.
- CDS-6 Clearance/Demolition - Funds will be used for the removal and elimination of slum and blighting conditions through clearance and demolition of vacant, abandoned, blighted, and dilapidated structures and improvements that are not suitable for rehabilitation.
- EDS-1, -2, -3 Economic Development - Improves and expands employment opportunities for low and moderate income persons. In addition, funds may support businesses and commercial growth through revitalization and development businesses and capital.
- 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.

3. Evaluation of past performance

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

The City of Rockford has a history of 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 the City's 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.

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

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

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The City of Rockford has followed its Citizen Participation Plan in the planning and preparation of the Annual Action Plan. The City held two (2) recorded virtual public hearings. The first virtual public hearing was recorded and made available for review and comment on the City's website at www.rockfordil.gov as of 8 am on November 20, 2020. This Public Hearing provided interested parties, including Rockford Citizens, with a summary of programs and activities currently funded by CDBG, HOME, and ESG federal grants and encouraged all parties to express their ideas and views on housing and community development needs, including priority non-housing community development needs and affirmatively furthering fair housing. The City of Rockford advertised the Public Hearing in its local newspaper. The ad appeared in the "Rockford Register Star" on November 6, 2020.

The City of Rockford CEDD Department maintains an internal contact list for housing, economic development and community development organizations. This list includes, but is not limited to, economic development, fair housing, homeless and housing agencies, and neighborhood organizations. In addition to providing information about the public hearing to the CEDD City contacts, a media release was sent to all of the local media outlets and organizations.

Drafts of the City's 2021 Annual Action Plan (AAP) and Citizen Participation Plan (CIP) were on display for review and comment for a 30-day period beginning Monday, December 7, 2020 and ending on Tuesday, January 5, 2021. The AAP draft included anticipated funding resources, as well as related proposed activities designed to meet community, housing, and economic development needs in Rockford. The Citizen Participation Plan (CPP) draft included clarifications regarding recent amendments related to the CARES Act, including the adherence of any health and safety mitigation measures.

Due to the COVID-19 pandemic restrictions, facilities allowing public access were limited. However, the drafts were made available for public review at the following locations:

- City of Rockford, Dept. of Community & Economic Development - 425 E. State Street
- City of Rockford website, www.rockfordil.gov
- City of Rockford, Human Services Office - 612 N. Church Street
- Rockford Housing Authority main office - 223 S. Winnebago Street

The second virtual public hearing was recorded and made available for review and comment on the City's website at www.rockfordil.gov as of 8 am on December 17, 2020. This public hearing summarized details of the draft plans and invited interested parties to review and comment on the draft documents. In addition, Community and Economic Development Department (CEDD) staff presented the plan to the City's Housing Committee on December 1, 2020.

The availability of the draft plans and details of the second public hearing were communicated using the same distribution methods used for the first virtual public hearing. The second virtual public hearing was advertised in the Rockford Register Star general circulation on December 3, 2020.

Substantial Amendment:

On 11/20/2021, the City notified the public of a public hearing scheduled for 12/6/2021. The public was also notified that a draft of the Substantial Amendment was available for review and public comment from 11/22/2021 to 12/21/2021. Locations to view the drafts were as follows: 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.).

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.

All comments and questions that were received to date, have been reviewed and responses have been prepared. These comments and responses are included in the attachments at the end of the 2021 Annual Action Plan.

Substantial Amendment: No comments received.

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

All of the comments submitted regarding the 2021 Annual Action Plan were accepted.

7. Summary

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 (1/1/2021 through 12/31/2021) 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.

Plan drafts were available for review through the following locations:

- City of Rockford, Dept. of Community & Economic Development - 425 E. State Street
- City of Rockford, Human Services Office - 612 N. Church Street
- Rockford Housing Authority main office - 223 S. Winnebago Street

The 30-day display period started on December 7, 2020 and ended on Tuesday, January 5, 2021. In addition, the City put the draft Plans on its website (www.rockfordil.gov). Two (2) virtual and recorded public hearings were held; first on November 20, 2020 and the second on December 17, 2020. Upon completion of the 30-day comment period and the federal allocation of 2021 funds, the City of Rockford submitted the FY 2021 Annual Action Plan to the U.S. Department of Housing and Urban Development Chicago Office.

On 11/20/2021, the City notified the public of a public hearing scheduled for 12/6/2021. The public was also notified that a draft of the Substantial Amendment was available for review and public comment from 11/22/2021 to 12/21/2021.

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

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

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

Agency Role		Name	Department/Agency
CDBG Administrator		ROCKFORD	Community and Economic Development Department
HOME Administrator		ROCKFORD	Community and Economic Development Department
ESG Administrator		ROCKFORD	Human Services Department

Table 1 – Responsible Agencies

Narrative (optional)

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

Consolidated Plan Public Contact Information

Deb Dorsey Housing and Program Manager

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

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

1. Introduction

In carrying out the programs and services required in the Consolidated Planning process, the City of Rockford consults with a wide variety of government departments, governmental agencies, and private and non-profit sectors to identify and address the extensive and varied housing, community development, and social service needs of our community. Through both formal and informal relationships and activities, Rockford has sought the participation and cooperation of all affected parties in developing the 2021 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, health care agencies, Continuum of Care, public housing authorities, community collaboration, private businesses, and community leaders. The following describes how government public and private agencies play a role in the planning process.

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

The City's CEDD staff works closely with other departments on activities addressing low and moderate income persons and neighborhoods and leverages resources and fills additional gaps. These departments include, but are not limited to, Legal, Public Works, Finance, and 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 Human Services Department. Referrals are also made to such agencies such as HomeStart (a local HUD-certified housing counselor and NeighborWorks agency), RAMP, and Northwestern Illinois Area Agency on Aging, as appropriate. The City also has an agreement with the Winnebago County Health Department for lead inspections, 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. The City is also a member of a Housing Partnership Group, made up of various housing-related partners in the community, which meets regularly to discuss programs and issues to help address housing needs in the community. Providers who have served as Community Housing Development Organizations in the past will be certified once projects come to fruition. Lastly, the City works with the Rockford Housing

Authority and the Winnebago County Housing Authority who organize resources from the federal government to address the housing needs of the City's lowest income households.

Both Public and Assisted Housing providers are active members of the Continuum of Care, as well as Crusader Clinic, the federally funded community health center, and Rosecrance, the local mental health provider. Rockford Housing Authority already provides a homeless preference point and has agreed to work with the Continuum of Care to add additional points for homeless persons coming through the Single Point of Entry System. Winnebago County Housing Authority provides Moving On vouchers for people transitioning out of permanent supportive housing, 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.

The Continuum of Care coordinates closely with the City of Rockford 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

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	Agency/Group/Organization	PRAIRIE STATE LEGAL SERVICES - ROCKFORD
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Public Comment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was invited to view and comment on the virtual public hearing. Staff provided written comment which is included in the Citizen Participation Comments attachment. Organization participates in the monthly Housing Partnership Group Meetings. See AP-10 narrative. Organization participates in meetings to address homelessness.
2	Agency/Group/Organization	NW HomeStart
	Agency/Group/Organization Type	Housing Regional organization Business Leaders Neighborworks Chartered Member
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was invited to view and comment on the virtual public hearing. Organization participated in meetings regarding federally funding housing programs. Organization participates in the monthly Housing Partnership Group Meetings. See AP-10 narrative.
3	Agency/Group/Organization	WINNEBAGO COUNTY HEALTH DEPARTMENT
	Agency/Group/Organization Type	Health Agency Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was invited to view and comment on the virtual public hearing. Organization participated in meetings regarding federally funding housing programs. Organization participates in the monthly Housing Partnership Group Meetings. See AP-10 narrative.
4	Agency/Group/Organization	Rockford Area Habitat for Humanity
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was invited to view and comment on the virtual public hearing. Organization participated in meetings and has had several telephone conversations with City staff regarding federally funding housing programs. Organization participates in the monthly Housing Partnership Group Meetings. See AP-10 narrative.
5	Agency/Group/Organization	SHELTER CARE MINISTRIES, INC.
	Agency/Group/Organization Type	Services-homeless Services-Health
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was invited to view and comment on the virtual public hearing. Organization participates in meetings to address homelessness.

6	Agency/Group/Organization	ROCKFORD HOUSING AUTHORITY
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Elderly Persons Services-Persons with Disabilities Other government - Local Business Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was invited to view and comment on the virtual public hearing. The City of Rockford is RHA's Responsible Entity for Environmental Review Records. Organization participates in the monthly Housing Partnership Group Meetings. See AP-10 narrative.
7	Agency/Group/Organization	Rosecrance Ware Center
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Homelessness Strategy

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

11	Agency/Group/Organization	NI ReACH
	Agency/Group/Organization Type	Housing PHA Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was invited to view and comment on the virtual public hearing. Organization participates in meetings to address homelessness. Organization participates in the monthly Housing Partnership Group Meetings. See AP-10 narrative.
12	Agency/Group/Organization	ZION DEVELOPMENT CORPORATION
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was invited to view and comment on the virtual public hearing. Organization participated in meetings regarding federally funding housing programs. Organization participates in the monthly Housing Partnership Group Meetings. See AP-10 narrative.
13	Agency/Group/Organization	RAMP
	Agency/Group/Organization Type	Housing Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was invited to view and comment on the virtual public hearing. Organization participates in the monthly Housing Partnership Group Meetings. See AP-10 narrative. City staff meet directly with RAMP staff regarding federally funded housing programs and the needs of Persons with Disabilities.
14	Agency/Group/Organization	Jeremiah Development, NFP
	Agency/Group/Organization Type	Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was invited to view and comment on the virtual public hearing. Organization participates in the monthly Housing Partnership Group Meetings. See AP-10 narrative.
15	Agency/Group/Organization	Transform Rockford
	Agency/Group/Organization Type	Housing Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was invited to view and comment on the virtual public hearing. Organization participated in meetings regarding federally funding housing programs.
16	Agency/Group/Organization	SiFi Networks
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers
	What section of the Plan was addressed by Consultation?	Broadband Internet

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	In early 2021, the City signed a development agreement with SiFi Networks, which will bring an underground, high-speed, fiber-optic network to Rockford. As part of the process, Internet Service Providers (ISPs) will be recruited to supply the network servicing, which will result in a competitive market for high speed broadband connectivity to Rockford citizens.
17	Agency/Group/Organization	TLS Veterans
	Agency/Group/Organization Type	Services - Housing Services-homeless Services-Employment
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Veterans Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was invited to view and comment on the virtual public hearing. Organization participates in meetings to address homelessness.
18	Agency/Group/Organization	Small Business Development Center
	Agency/Group/Organization Type	Services-Education Services-Employment Regional organization Planning organization Business Leaders
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Organization was invited to view and comment on the virtual public hearing.

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

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 Development staff should additional funds be needed.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	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.
2020 Comprehensive Plan Update	City of Rockford	The City of Rockford 2020 Comprehensive Plan provides a vision for the future of Rockford, focusing on City policies and strategies to guide the physical development of the City. The City is in the process of completing a 5 year update to the plan, which will support all priorities identified in the 5 year plan.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

Due to the COVID-19 pandemic, the City modified its Citizen Participation Plan in order to address Public Health Recommendations, as well as Major Disaster Declarations. Per the modified plan, and in conjunction with federal/state and local recommendations to socially distance and limit public gatherings, the City's public hearings were held virtually, recorded, and made available on the City's website. Presentation slides of the public hearings were also posted on the City's website. The public was able to view or watch the public hearing information regarding the 2021 Annual Action Plan, per Health Department guidelines, at a time that was convenient for them. Information regarding the availability of the public hearings was sent to the local media via press releases. Over 90 community partners (housing, homeless, community development and economic development organizations) were consulted via email which invited them to view and comment on the City's virtual public hearing regarding the City's 2021 Annual Action Plan. In addition, information about the public hearings was sent to 60 neighborhood groups/leaders to be distributed to their members. Both the 11/20/20 and 12/17/20 public hearing videos had over 20 independent views.

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

See AP-05 Executive Summary. Based on priority needs in the 2020-2024 Five-Year Consolidated Plan, the City continues to fund projects/activities necessary to advance the community.

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	<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>	<p>23 views of 11/20/20 YouTube recording of public hearing</p> <p>21 views of 12/17/20 YouTube recording of public hearing</p>	See attached appendix with public comments and responses.	The City accepted all comments that were received.	https://rockfordil.gov/city-departments/community-and-economic-development/cedd-reports/

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	<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>	<p>16 views of 12/6/2021 YouTube recording of public hearing</p>	No comments received	N/A	rockfordil.gov

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City of Rockford is receiving \$2,244,583 CDBG funds, \$987,501 in HOME funds, and \$185,222 in ESG funds for the FY 2021 program year. The City's program year is from January 1, 2021 to December 31, 2021. These funds will be used to address the following priority needs: Housing; Homeless; Other Special Needs; Community Development; Economic Development; and Administration, Planning, and Management.

The accomplishments of these projects/activities will be reported in the FY 2021 Consolidated Annual Performance and Evaluation Report (CAPER).

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of 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	2,244,583	0	0	2,244,583	6,506,703	7 Projects/activities were based on the FY 2021 CDBG allocations.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	987,501	7,742	0	995,243	2,941,979	5 Projects/activities were based on the FY 2021 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	185,222	0	0	185,222	553,342	1 Project1/activity was based on the FY 2021 ESG 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

Leverage:

Response:

The City's Community and Economic Development and Human Services Departments leverage entitlement and other public dollars with private, state and local resources. They include, but are not limited to, the following:

Public:

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

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

Private:

- Housing rehabilitation – If the cost of rehabilitation exceeds the City's program maximums, property owners can invest their own savings, 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 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 Demolition and Clearance programs, as well as housing rehabilitation. The City plans to apply for future related program funding as it becomes available.

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

Local:

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

- The Winnebago County Health Department
- The Rockford Area Habitat for Humanity
- The Community Foundation of Northern Illinois
- Tax Increment Financing Districts
- 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; having an excess amount of \$1,078,723 from previous years. The match requirement is generally met through housing developments. However, the City does report other match funds as they become available. For homeownership, this might be volunteer labor on a Habitat home that was purchased using the City's homeownership program. For housing rehabilitation projects, this could include capital improvements completed in the area.

The City anticipates that it will have ESG match of \$185,222 from local and state funds. In addition to local and state funds, match consists of donations and grants to ESG sub-grantees.

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

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

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

N/A

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: \$197,500	Homeowner Housing Added: 1 Household Housing Unit Other: 1 Other
2	HS-2 Housing Rehabilitation	2020	2024	Affordable Housing	City Wide CDBG Eligible Areas NRSA	Housing Strategy	CDBG: \$212,847 HOME: \$622,358	Homeowner Housing Rehabilitated: 33 Household Housing Unit
3	HS-3 Homeownership	2020	2024	Affordable Housing	City Wide CDBG Eligible Areas NRSA	Housing Strategy	HOME: \$76,635	Direct Financial Assistance to Homebuyers: 5 Households Assisted
4	HS-4 Fair Housing	2020	2024	Affordable Housing	City Wide CDBG Eligible Areas NRSA	Housing Strategy	CDBG: \$10,000	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	HS-5 Project Delivery	2020	2024	Affordable Housing	City Wide CDBG Eligible Areas NRSA	Housing Strategy	CDBG: \$376,774	Homeowner Housing Added: 1 Household Housing Unit Homeowner Housing Rehabilitated: 24 Household Housing Unit Direct Financial Assistance to Homebuyers: 5 Households Assisted Other: 2 Other
6	HMS-1 Housing	2020	2024	Homeless	City Wide	Homeless Strategy	ESG: \$50,000	Other: 1 Other
7	HMS-2 Operation/Support	2020	2024	Homeless	City Wide	Homeless Strategy	ESG: \$50,000	Other: 2 Other
8	HMS-3 Prevention and Re-Housing	2020	2024	Homeless	City Wide	Homeless Strategy	ESG: \$75,961	Other: 1 Other
13	CDS-2 Infrastructure	2020	2024	Non-Housing Community Development	City Wide CDBG Eligible Areas Neighborhood Revitalization Strategy Area (NRSA)	Community Development Strategy	CDBG: \$750,000	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
17	CDS-6 Clearance/Demolition	2020	2024	Non-Housing Community Development	City Wide CDBG Eligible Areas NRSA	Community Development Strategy	CDBG: \$496,804	Buildings Demolished: 45 Buildings
21	EDS-2 Development	2020	2024	Economic Development	City Wide CDBG Eligible Areas NRSA	Economic Development Strategy	CDBG: \$0	Businesses assisted: 0 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: \$398,158 HOME: \$98,750 ESG: \$9,261	Other: 3 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	Goal Name	HS-3 Homeownership
	Goal Description	Continue to assist low- and moderate-income homebuyers to purchase homes by providing direct subsidies which include but are not limited to down payment and closing cost assistance including housing counseling fees, interest subsidies, etc.
4	Goal Name	HS-4 Fair Housing
	Goal Description	Promote fair housing choice through education, testing, training, and outreach in the City of Rockford.
5	Goal Name	HS-5 Project Delivery
	Goal Description	Provide eligible program delivery and oversight for the CDBG and HOME funded housing projects/activities.
6	Goal Name	HMS-1 Housing
	Goal Description	Support the Continuum of Care's efforts and applicants to provide emergency shelter, transitional housing, permanent supportive housing, and other permanent housing opportunities.
7	Goal Name	HMS-2 Operation/Support
	Goal Description	Assist providers who operate housing or provide support services for the homeless and persons or families at-risk of becoming homeless.
8	Goal Name	HMS-3 Prevention and Re-Housing
	Goal Description	Assist the Continuum of Care's efforts in prevention of homelessness through anti-eviction activities and program for rapid re-housing.

13	Goal Name	CDS-2 Infrastructure
	Goal Description	Improve the public infrastructure through rehabilitation, reconstruction, and new construction, of streets, sidewalks, bridges, curbs, walkways, water, storm water, sanitary sewer, handicap accessibility improvements/removal of architectural barriers, etc.
17	Goal Name	CDS-6 Clearance/Demolition
	Goal Description	Remove and eliminate slum and blighting conditions through clearance and demolition of vacant, abandoned, and dilapidated structures and improvements that are not suitable for rehabilitation.
21	Goal Name	EDS-2 Development
	Goal Description	Support business and commercial growth through rehabilitation of store fronts and retail space, expansion of businesses, and the development of new businesses.
24	Goal Name	AMS-1 Overall Coordination
	Goal Description	Provide program management and oversight for the successful administration of Federal, State, and locally funded programs, including planning services for special studies, annual action plans, five year consolidated plans, substantial amendments, consolidated annual performance and evaluation reports (CAPER), environmental reviews and clearances, fair housing, and compliance with all Federal, State, and local laws and regulations.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b)

Approximately thirty (30) households with incomes at or below eighty percent (80%) of Area Median Income will benefit from HOME funds.

Projects

AP-35 Projects – 91.220(d)

Introduction

The City of Rockford proposes to undertake the following activities with the FY 2021 CDBG, HOME, and ESG, funds.

Projects

#	Project Name
1	CDBG Administration
2	Housing Services
3	Rehab Services
4	CDBG Housing Rehabilitation
5	Fair Housing
6	Clearance/Demolition
7	Economic Development
8	HOME Administration
9	HOME Housing Rehabilitation
10	Homeownership
11	Housing Development
12	CHDO Operating
13	ESG21 Rockford
14	Infrastructure

Table 7 - Project Information

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

There are many factors that guided the City when developing the FY 2021 budget for CDBG, HOME, and ESG. In addition to taking into consideration feedback from the community, as described in the document, the City considered the following:

- 1) per the CDBG regulations, at least 70% of the City's CDBG entitlement expenditures over a 3 year period must benefit low/mod income persons. This may occur through directly assisting low/mod income households and/or benefitting low/mod persons through an area benefit.
- 2) By program design, all of the HOME and ESG program funds, except for allowable administration, planning, and/or CHDO operating costs, must benefit low income households. The City determines that beneficiaries are low income by documenting their income or, under certain circumstances, the City is allowed to presume beneficiaries are low income.
- 3) Local and regional plans, strategies, and initiatives (i.e., the 5-Year Consolidated Plan, NRSA, the 2020 Comprehensive Plan, the National Resource Network (NRN) Neighborhood Revitalization Strategy, etc.).
- 4) The capacity of staff and partners, ensuring the City's Grant Policy and federal regulations are followed.
- 5) Level of need and other resources available to meet those needs, and
- 6) ability to leverage other resources to provide the greatest return on investment.

The City plans to meet the National Objective of low/mod income for the FY 2021 budget through the following:

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

3) Infrastructure projects will be based in low/moderate income areas that are primarily residential.

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

The City must designate the 6 Priority Needs (Housing, Homeless, Other Special Needs, Community Development, Economic Development, and Administration, Planning and Management) as High or Low Priority. If activities are designated as High priority, they are expected to be funded during FY 2021. If designated as Low Priority, activities may not be funded during FY 2021. All of the priorities needs are ranked High Priority, except for Other Special Needs, which is ranked Low Priority. The City may support applications for other funding, if those activities are consistent with the needs identified in the 2020-2024 Five-Year Consolidated Plan.

One of the biggest obstacles to addressing underserved needs is the age of Rockford's housing stock. 78% of the City's housing stock was built in 1979 or prior. The cost to rehabilitate homes to bring them up to code is expensive, due to lead-based paint requirements and the cost of deferred maintenance. In addition, there is a potential for the homes to be considered historic. The materials needed to meet historic standards are usually more expensive and may need to be custom-ordered, which increases the construction time to complete the project. Most of the City's rehabilitation projects will require lead licensed contractors, which are limited in quantity and in high demand for other housing programs in the region

AP-38 Project Summary
Project Summary Information

1	Project Name	CDBG Administration
	Target Area	City Wide
	Goals Supported	AMS-1 Overall Coordination
	Needs Addressed	Administration, Planning, and Management Strategy
	Funding	CDBG: \$398,158
	Description	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. No more than 20% of CDBG grant funds (plus allowable program income) may be used for planning and administration.
	Target Date	12/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	1 Other

	Location Description	City Wide
	Planned Activities	Administration of federal, state and locally funded programs, including all necessary compliance, planning, reviews, and reports.
2	Project Name	Housing Services
	Target Area	City Wide CDBG Eligible Areas NRSA
	Goals Supported	HS-5 Project Delivery
	Needs Addressed	Housing Strategy
	Funding	CDBG: \$186,230
	Description	Funds may be used to pay costs in support of activities eligible for funding under the HOME program. This includes services such as housing counseling in connection with affordable housing projects, energy auditing, preparation of work specifications, loan processing, inspections, tenant selection, and other services related to assisting owners, tenants, contractors, and other entities participating or seeking to participate in the HOME program.
	Target Date	12/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	25 Household Housing Units 5 Households Assisted 1 Other
	Location Description	Community Development Block Grant (CDBG) eligible areas, City Wide, and Neighborhood Revitalization Strategy Area (NRSA)
	Planned Activities	Project delivery to support HOME-funded housing rehabilitation (24 units), homeownership (5 units), affordable housing (1 unit) and CHDO Operating (1 other).
3	Project Name	Rehab Services
	Target Area	City Wide CDBG Eligible Areas NRSA
	Goals Supported	HS-5 Project Delivery
	Needs Addressed	Housing Strategy
	Funding	CDBG: \$190,544

	Description	Funding will provide for housing administration and activity delivery costs for all CDBG assisted housing rehabilitation and housing rehabilitation carried out using other funding sources that meet all CDBG program requirement. This includes, but is not limited to direct and indirect costs integral to the delivery of the activities.
	Target Date	12/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	1 other
	Location Description	Community Development Block Grant (CDBG) Eligible Areas, City Wide, and Neighborhood Revitalization Strategy Area (NRSA)
	Planned Activities	Project delivery to support CDBG-funded housing rehabilitation (9 units).
4	Project Name	CDBG Housing Rehabilitation
	Target Area	City Wide CDBG Eligible Areas NRSA
	Goals Supported	HS-2 Housing Rehabilitation

	Needs Addressed	Housing Strategy
	Funding	CDBG: \$212,847
	Description	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.
	Target Date	12/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	9 Household Housing Units
	Location Description	Community Development Block Grant (CDBG) Eligible Area, City Wide, and Neighborhood Revitalization Strategy Area (NRSA)
	Planned Activities	Housing rehabilitation assistance for owners to address properties occupied by owners and renters (9 units).
5	Project Name	Fair Housing
	Target Area	City Wide

	Goals Supported	HS-4 Fair Housing
	Needs Addressed	Housing Strategy
	Funding	CDBG: \$10,000
	Description	Promotes fair housing choice through education, training, testing, and outreach in the City of Rockford.
	Target Date	12/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	1 other
	Location Description	City Wide
	Planned Activities	Provide education, training, testing, and outreach regarding Fair Housing topics.

6	Project Name	Clearance/Demolition
	Target Area	City Wide CDBG Eligible Areas NRSA
	Goals Supported	CDS-6 Clearance/Demolition
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$496,804
	Description	Funds will be used for the removal and elimination of slum and blighting conditions through clearance and demolition of vacant, abandoned, blighted, and dilapidated structures and improvements that are not suitable for rehabilitation.
	Target Date	12/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	45 Buildings
	Location Description	Community Development Block Grant (CDBG) Eligible Area, City Wide, and Neighborhood Revitalization Strategy Area (NRSA)

	Planned Activities	Clearance, demolition, removal of vacant and blighted structures, and improvements for properties that are not suitable for rehabilitation (45 Buildings).
7	Project Name	Economic Development
	Target Area	City Wide CDBG Eligible Areas NRSA
	Goals Supported	EDS-2 Development
	Needs Addressed	Economic Development Strategy
	Funding	CDBG: \$0
	Description	Funding may be used to improve and expand employment opportunities for low and moderate income persons. In addition, funds may support businesses and commercial growth through revitalization and development businesses and capital.
	Target Date	12/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	0 Businesses Assisted
	Location Description	Community Development Block Grant (CDBG) Eligible Area, City Wide, and Neighborhood Revitalization Strategy Area (NRSA)
	Planned Activities	ED projects will either serve low/moderate income areas by census tract or block group, be located in a census tract or block group with poverty level greater than 20% (or 30% if including Central Business District), create or retain employment of which 51% will be held by or made available to low-to-moderate income individuals, assist low-to-moderate income microenterprise development or align with a redevelopment plan. 0 Businesses will be assisted.
8	Project Name	HOME Administration
	Target Area	City Wide
	Goals Supported	AMS-1 Overall Coordination
	Needs Addressed	Administration, Planning, and Management Strategy
	Funding	HOME: \$98,750

	Description	Provide program management and oversight for the successful administration of Federal, State, and locally funded programs, including planning services for special studies, annual action plans, five year consolidated plans, substantial amendments, consolidated annual performance and evaluation reports (CAPER), environmental reviews and clearances, fair housing, and compliance with all Federal, State, and local laws and regulations. No more than 10% HOME funds (plus allowable program income) may be used for planning and administration.
	Target Date	12/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	1 other
	Location Description	City Wide
	Planned Activities	Administration of HOME program, including and all necessary compliance, planning, reviews, and reports.
9	Project Name	HOME Housing Rehabilitation
	Target Area	City Wide CDBG Eligible Areas NRSA

	Goals Supported	HS-2 Housing Rehabilitation
	Needs Addressed	Housing Strategy
	Funding	HOME: \$622,358
	Description	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.
	Target Date	12/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	24 Household Housing Units
	Location Description	Community Development Block Grant (CDBG) Eligible Area, City Wide, and Neighborhood Revitalization Strategy Area (NRSA)
	Planned Activities	Housing rehabilitation assistance for owners to ensure properties occupied by owners and renters meet local code, including the removal of lead and other hazards. In addition, the funding can be used to make units accessible (24 units).
10	Project Name	Homeownership

	Target Area	City Wide CDBG Eligible Areas NRSA
	Goals Supported	HS-3 Homeownership
	Needs Addressed	Housing Strategy
	Funding	HOME: \$76,635
	Description	Assists 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.
	Target Date	12/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	5 Household Housing Units
	Location Description	Community Development Block Grant (CDBG) Eligible Area, City Wide, and Neighborhood Revitalization Strategy Area (NRSA)
	Planned Activities	Assist low income homebuyers to purchase homes by providing direct subsidies which include but are not limited to down payment and closing cost assistance, including housing counseling fees, interest subsidies, etc. (5 units).

11	Project Name	Housing Development
	Target Area	City Wide CDBG Eligible Areas NRSA
	Goals Supported	HS-1 Housing Development
	Needs Addressed	Housing Strategy
	Funding	HOME: \$148,126
	Description	Increases the number of affordable housing units in the City for owners and renters by assisting with acquisition, development fees, construction, and rehabilitation.
	Target Date	12/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	1 Household Housing Unit
	Location Description	Community Development Block Grant (CDBG) Eligible Area, City Wide, and Neighborhood Revitalization Strategy Area (NRSA)

	Planned Activities	Developers demonstrating the capacity to deliver projects of similar or larger scope, value and quality may receive assistance to develop single or multi-family housing units for the purpose of homeownership or rental. Includes Community Housing Development Organization (CHDO) projects. 1 development will be assisted.
12	Project Name	CHDO Operating
	Target Area	City Wide
	Goals Supported	HS-1 Housing Development
	Needs Addressed	Housing Strategy
	Funding	HOME: \$49,374
	Description	Operating funds are available for a non-profit meeting the Community Housing Development Organization (CHDO) requirements. CHDOs must have an eligible project within twenty-four (24) months of the operating award. Funds are limited to 5% of the HOME allocation.
	Target Date	12/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	1 other
	Location Description	City Wide
	Planned Activities Operating funds are available for a non-profit meeting the Community Housing Development Organization (CHDO) requirements. CHDOs must have an eligible project within twenty-four (24) months of the operating award. Funds are limited to 5% of the HOME allocation. 1 CHDO will be assisted.	
13	Project Name	ESG21 Rockford
	Target Area	City Wide
	Goals Supported	HMS-1 Housing HMS-2 Operation/Support HMS-3 Prevention and Re-Housing AMS-1 Overall Coordination

	Needs Addressed	Homeless Strategy Administration, Planning, and Management Strategy
	Funding	ESG: \$185,222
	Description	ESG funds will be used for essential services, operating/rehab of emergency shelters, homeless prevention/rapid rehousing, HMIS, and administration.
14	Project Name	Infrastructure
	Target Area	City Wide CDBG Eligible Areas
	Goals Supported	CDS-2 Infrastructure
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$750,000
	Description	Improve the public infrastructure through rehabilitation, reconstruction, and new construction, of streets, sidewalks, bridges, curbs, walkways, water, storm water, sanitary sewer, handicap accessibility improvements/removal of architectural barriers, etc.
	Target Date	12/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	1 Other
	Location Description	Community Development Block Grant (CDBG) Eligible Area, and City Wide
	Planned Activities	The 9 th Street reconstruction project includes new asphalt pavement, storm sewer system, curb and gutter, sidewalk facilities, and upgraded bicycle level of service.

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

According to the 2011-2015 American Community Survey 5-Year Estimates, 54.03% of the census tracts in Rockford are considered low/moderate income. See 2021 Rockford CDBG Area map. 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 early 2021, the City received an Illinois Housing Development Authority (IHDA) Strong Communities Program grant of \$250,000 to support the City's demolition program. This grant program will be focused in the City's NRSA area to leverage the removal of blighted residential properties.

Geographic Distribution

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

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

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

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

The City of Rockford will utilize its CDBG, HOME, and ESG funds to rehabilitate homes, assist with home ownership, and homeless programs. The one year goals for HOME-funded affordable housing in the City of Rockford for FY 2021 are as follows:

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	30
Special-Needs	0
Total	30

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	1
Rehab of Existing Units	24
Acquisition of Existing Units	5
Total	30

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

Discussion

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

- **CDBG Housing Rehabilitation:** Housing rehabilitation assistance for owners to address properties occupied by owners and renters (9

Rehab of Existing Units).

- **Emergency Solutions Grant:** Through essential services, operating/rehab of emergency shelters, and homeless prevention/rapid rehousing, 150 homeless households will receive support, and 45 households will receive rental assistance.

AP-60 Public Housing – 91.220(h)

Introduction

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

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

The Rockford Housing Authority’s (HACP) has outlined nine (9) goals in addressing its needs as an agency:

Goal 1: Maintain and Strengthen financial viability

Objective A: Achieve positive cash flow within each managed program and asset. Diversify.

Objective B: Create business opportunities including consulting and training activities

Goal 2: Develop Non-HUD income streams Fully Support Operations – includes Fee for Service with RHA.

Objective A: Develop a full cost of operation

Objective B: Establish budget and funding targets annually

Objective C: Internally track and monitor the flow of funds

Objective D: Create revenue streams through Fee for Services

Goal 3: Through demolition, disposition, or a combination of redevelopment and demolition, transition our residents into modern affordable

housing family developments.

Objective A: Develop a variety of housing options, transitioning outdated, debilitated units into
Modern affordable homes

Objective B: Creation of additional affordable housing units

Goal 4: Upgrade the Scattered Site program

Objective A: Remove units that are not financially viable

Objective B: Create additional home-ownership opportunities

Goal 5: Upgrade and modernize the high rise and low rise buildings

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

Objective B: Creatively utilize a variety of grant funding sources to leverage investment capital

Goal 6: Expand case management capabilities in our Human Services Departments

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

Objective B: Increase the number of participants in empowerment activities to encourage self-sufficiency

Goal 7: Require greater accountability for participants and landlords of all HCV programs

Objective A: Educate and train staff, participating and potential landlords in how existing HCV program regulations support stricter lease

enforcement by landlords and lease compliance

Goal 8: Achieve greater accountability for public housing residents through strengthening lease enforcement and lease provisions as well as enhanced monitoring and training.

Goal 9: Continue to improve efficiency and effectiveness of our work force through targeted training

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

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

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

RHA has created and drafted curriculum for a Life Force Development Institute. This Educational Development & Social Skills platform, is an

intense twelve-week program that focuses on:

- Expressing your needs, opinions, and preferences without offending others.
- Conveying a positive self-image to others.
- Identifying alternative courses of action.
- Following through with a plan or decision.
- Managing time effectively.
- Quickly and accurately identifying critical issues when making a decision or solving a problem.
- Creating innovative solutions to complex problems.
- Describing the importance of your needs, values, interests, strengths, and weaknesses.

Participants of this LDI program and also enrolled a financial wellness program as part of the curriculum. This program is recognized by local employers as a continuing education program and is a source of recommendation for participants.

Recreate: Special Programs and Initiatives has special programs and initiatives such as ConnectHome, New Mix & Craft Entrepreneurship, and Resident Leadership Council. Resident Opportunities for Self-Sufficiency (ROSS): The ROSS program works closely with individual work plans related to employment, education, and strategies to reduce and eliminate subsidy assistance. A team of ROSS Case Managers work closely with residents to develop work plans to meet individual goals and they connect residents with local agencies and services that provide additional supportive services and resources needed to achieve success.

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

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

Discussion

N/A

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

Introduction

The City of Rockford is part of the 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

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 Human Services Community Service Division has a street outreach team to identify homeless individuals and get them into emergency and eventually permanent shelter. Individuals' needs are assessed during street outreach to make referrals for services

if an individual does not want shelter assistance.

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

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

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

Addressing the emergency shelter and transitional housing needs of homeless persons

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

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

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

The City of Rockford’s Department of Human Services Community Service Division offers three (3) housing assistance programs. These are: rapid

rehousing, homeless prevention, and condemnation relocation.

The Community Service Division offers a 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.

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 diversion program works with persons at risk of homelessness to provide them with the necessary referrals and resources to avoid homelessness. Our overall retention rate for persons who are permanently housed is 96% over 12 months.

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.

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

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

Community Action Board and the Head Start Policy Council.

Discussion

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 2021. If designated as Low Priority, the Priority Need may not be funded during FY 2021. 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. 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:

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.

The City implemented a Vacant & Foreclosed Property Registry in 2019. This early warning system requires all property owners of vacant properties and mortgagees of foreclosed properties to register online. This registry helps the City to track properties that are or may become nuisances so that the City can prevent further neighborhood decay and identify health, safety, and code issues that need to be addressed. The ordinance requires property owners and banks who are foreclosing on mortgages to register their properties semi-annually; establish reliable contact information for the owners or responsible parties; and maintain the properties in accordance with the City's code. The owner or bank must also designate a property manager with authority to make necessary repairs to bring the properties into compliance with the City's code. There were less foreclosures/registrations in 2020, due to COVID-related moratoriums, and the City currently has 260 active registrations.

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 Land Bank enhances the City's efforts in addressing vacant and blighted properties, in addition to providing more effective and efficient procedures for returning properties to beneficial private or public uses. In 2020, the Land Bank sold their first property that otherwise could have been demolished. The new Agent for the Winnebago County Trustee has successfully held two online auctions of properties over the past year. The most recent auction ended in December 2020, and the total sales amount was just over \$700,000. The majority of these homes will require rehabilitation work and additional investment. The trustee agent estimates that the value of these properties will be about 4x the sales price after the rehab is complete. If that is the case, the EAV on the houses will be about \$1 million. Some of the homes that were sold through the first auction have already sold for 10x their sales price after a rehab is complete.

See "Discussion" below for additional narrative.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such

as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The City of Rockford plans to take the following actions during 2021:

- Solicit ideas and feedback about opportunities to provide fair housing training, education or programming in our community.
- Pass a proclamation recognizing the impact and importance of the Fair Housing Act of 1968.
- Make informational brochures and other resources on fair housing rights available to residents.
- Support the efforts of the newly formed 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
- 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 downpayment 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

Discussion:

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

AP-85 Other Actions – 91.220(k)

Introduction:

The City of Rockford has developed the following actions which addresses obstacles to meeting underserved needs, fosters affordable housing, reduces lead-based hazards, reduces the number of poverty-level families, develops institutional structures, and enhances coordination between public and private housing and social service agencies.

Actions planned to address obstacles to meeting underserved needs

The City under its FY 2021 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 fund projects that assist businesses.
- Continue to leverage resources for minority and women owned businesses.
- The City will continue to leverage its financial resources and apply for additional public and private funds.
- The City will continue to provide services and resources to homeless individuals and households.

Actions planned to foster and maintain affordable housing

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.

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

- **CDBG Housing Rehabilitation** - Funding will increase the number of decent, safe, and sanitary single family housing (1-4 units) which will be occupied by low income beneficiaries (homeowner with or without special needs). (9 households)
- **HOME Housing Rehabilitation** - Funding will increase the number of decent, safe, and sanitary single family housing (1-4 units) which will be occupied by low income beneficiaries (homeowner with or without special needs). (24 households)
- **Homeownership** - Direct homebuyer assistance is available to low-income households purchasing single family (1-4) units. (5 households)
- **Affordable 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. (1 housing unit)
- **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

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 assessment, paint testing, lead hazard reduction, and also post project lead clearances.
- Required lead hazard reduction work and protective measures are incorporated into project rehabilitation specifications.

Homeownership Programs:

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

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

Lead reduction involves the implementation of a lead-based paint treatments which will be carried out in conjunction with the City of Rockford's CDBG and HOME funded housing activities. The City partners with, and supports, the Winnebago County Health Department, who administers a "Creating Lead Safe Rockford" (CLSR) program. This program is funded by the U.S. Department of Housing and Urban Development (HUD) to mitigate lead hazards for low/moderate income owner-occupied or rental homes in the region. The City recognizes the importance of addressing lead-based paint hazards and will continue to support partners with and/or apply for additional resources to support these efforts.

Actions planned to reduce the number of poverty-level families

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

To effectively implement the Five-Year Consolidated Plan, the City needs to collaborate with a variety of agencies located in the City of Rockford and in Winnebago County. Coordination and collaboration between agencies is important to ensuring that the priorities identified in the Five-Year Consolidated Plan within the City are adequately addressed. The key agencies that are involved in the implementation of the Five Year Consolidated Plan and FY 2021 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.
- Two 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.
- 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 their loan.
- The City collaborates with other housing partner agencies to not only leverage funds but also support partner housing and community development projects.

Private Industry –

The private sector is an important collaborator in the services and programs associated with the Five-Year Consolidated Plan and Annual Action Plan. The private sector brings additional resources and expertise that can be used to supplement existing services or fill gaps in the system. Several lending institutions provide first-time mortgage financing and financing for rehabilitation. Lenders, affordable housing developers, business and economic development organizations, and private service providers offer a variety of assistance to residents such as health care, small business assistance, home loan programs, and assisted housing, etc.

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

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

Discussion:

N/A

Program Specific Requirements

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

Introduction:

The City of Rockford receives an annual allocation of CDBG, HOME, and ESG funds. For "Other CDBG Requirements" below, this Annual Action Plan covers years 2020, 2021, and 2022.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

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

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

Other CDBG Requirements

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

70.00%

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.

Covered FY 2020, 2021, 2022

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

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

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

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:

Eligible applicants for the City's homebuyer assistance program include any individuals who meet the HOME income requirements, are able to obtain first mortgage financing, and are interested in purchasing a single-family home in the City of Rockford. The City accepts applications for the HOME-funded homebuyer assistance program on a year-round basis. Applications are considered as they are completed and submitted to the City. Information about the City's homebuyer assistance program, including application packages, can be found on the Neighborhood Development programs page of the City of Rockford's website: www.rockfordil.gov. Program brochures are available at City Hall, 425 E. State Street, and information is also available through the Illinois Housing Guide website <http://ilhousingguide.org>. In addition, interested individuals may call the Neighborhood Development team to get additional information over the phone regarding the program.

The City administers the Homebuyer Assistance Program. Presumption of affordability. Additional Resale/Recapture guidelines are attached

in the Grantee Unique Appendices.

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

In addition to the guidelines described in question #2 above for Recapture, the City may allow a subsequent buyer to assume the HOME assistance (subject to the HOME requirements for the remaining term of affordability) if the subsequent buyer is low-income, and no additional HOME assistance is provided. To preserve affordability, the City may use HOME funds to acquire units through a purchase option, right of first refusal or other preemptive right to purchase the housing before foreclosure, or at the foreclosure sale. (HOME funds may be used to cover the foreclosure costs to acquire housing with a HOME loan in default, but not to repay a loan made with HOME funds.) The affordability restrictions shall be revived according to the original terms if, during the original affordability period, the owner of record before the termination event, obtains an ownership interest in the housing. Also, to preserve affordability the City may use HOME funds to rehabilitate a unit, cover any costs associated with owning/holding the unit, and/or provide assistance to subsequent buyer. When this occurs, the additional investment is treated as an amendment to the original project unless the City chooses to treat the expense as an administration cost. As a project cost, the original and the additional HOME funds will not exceed the maximum per unit subsidy amount under 24 CFR 92.250. Any administrative funds that are used may be reimbursed, in whole or in part, when the housing is sold to a new eligible homebuyer.

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

In general, the City does not intend to use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds. In addition, the funds will not be used to refinance multifamily loans made or insured by any federal program. The City is aware that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG. The City reserves the right to consider such action and will ensure that guidelines are developed and implemented.

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

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

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

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

The Rock River Homeless Coalition 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 does include 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 and Boone Counties. Based on HUD recommendations, the SPOE prioritizes clients based on lowest income, longest/chronically homeless and greatest barriers. In accordance with the Housing First Model, those with the highest priority will be directed to Permanent Housing options first (including supportive and non-supportive housing options), followed by Transitional Housing and Emergency Shelters. Based on federal initiatives, special preference

will also be given to veterans and chronically homeless individuals or families.

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

The ESG funds will be awarded to community-based, nonprofit organizations providing emergency shelter and related services to the homeless, on a dollar-for-dollar match. The City 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.

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.

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

Grantee Unique Appendices

City of Rockford

2021 Annual Action Plan

- Proof of Publication
- Citizen Participation Comments & Responses
- Citizen Participation Plan



Official Certificate of Publication as Required by State Law and IPA By-Laws

Certificate of the Publisher

Gannett certifies that it is the publisher of the Rockford Register Star. Rockford Register Star, a secular newspaper, has been continuously published daily for more than 50 weeks prior to the first publication of the attached notice, is published in the City 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.

A notice, a true copy of which is attached, was published 1 time in Rockford Register Star. The publication of the notice was made in the newspaper, dated and published on **November 6th, 2020**. The notice was also placed on a statewide public notice website as required by 715 ILCS 5/2.1.

In witness, the Rockford Register Star has signed this certificate by Gannett, its publisher, at Rockford, Illinois, on **November 6th, 2020**.

City of Rockford
Ad #RRS000276725

By:

Ashley Anderson
Legal Notice Representative
Rockford Register Star – Gannett

Publisher

(Note: Unless otherwise ordered, notarization of this document is **not** required.)
Ad attached

**CITY OF ROCKFORD COMMUNITY
& ECONOMIC DEVELOPMENT
PUBLIC NOTICE AND HEARING**

Notice is hereby given that the City of Rockford (City) will hold a virtual public hearing. The public hearing will be recorded and available for review and comment starting 11/20/2020 (8 AM) on the City's website at www.rockfordil.gov. A summary of programs and activities currently funded by the City's Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grants (ESG) federal grants received an-

nually from the U.S. Department of Housing and Urban Development (HUD) will be provided.

City Staff encourages all interested parties, including Rockford citizens, to express their ideas and views on housing and community development needs, including priority non-housing community development needs and affirmatively furthering fair housing. These ideas and views will be taken into consideration as the City prepares its 2021 Plan and Budget for CDBG, HOME, and ESG funds. Please contact Deb Dorsey, Housing and Program Manager at Deb.Dorsey@rockfordil.gov, 779-

348-7442, or by using the City's payment drop box located at 425 East State Street, Rockford, IL 61104, parking lot entrance. Envelopes must be addressed to Deb Dorsey, Housing & Program Manager, Dept. of Community & Economic Development.

If special arrangements need to be made to accommodate any resident in order for them to view the public hearing, including translation services, please call Rea Anderson, Community & Economic Development Dept., City of Rockford, at (779) 348-7162, to make those arrangements.



Official Certificate of Publication as Required by State Law and IPA By-Laws

Certificate of the Publisher

Gannett certifies that it is the publisher of the Rockford Register Star. Rockford Register Star, a secular newspaper, has been continuously published daily for more than 50 weeks prior to the first publication of the attached notice, is published in the City 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.

A notice, a true copy of which is attached, was published 1 time in Rockford Register Star. The publication of the notice was made in the newspaper, dated and published on **December 3rd, 2020**. The notice was also placed on a statewide public notice website as required by 715 ILCS 5/2.1.

In witness, the Rockford Register Star has signed this certificate by Gannett, its publisher, at Rockford, Illinois, on **December 3rd, 2020**.

City of Rockford
Ad #RRS000278124

By:

Ashley Anderson
Legal Notice Representative
Rockford Register Star – Gannett

Publisher

(Note: Unless otherwise ordered, notarization of this document is **not** required.)
Ad attached

**NOTICE OF PUBLIC HEARING AND DISPLAY
OF THE CITY OF ROCKFORD 2021 ANNUAL ACTION PLAN and
CITIZEN PARTICIPATION PLAN**

Notice is hereby given that the City of Rockford (City) will hold a virtual public hearing. The public hearing will be recorded and available for review starting 12/17/2020 (8 AM) on the City's website at www.rockfordil.gov. The purpose of the public hearing is to present a ~~draft of the City's 2021 Annual Action Plan (AAP) and amendments to the Citizen Participation Plan (CPP).~~

The AAP summarizes available funding resources, as well as related proposed activities designed to meet community, housing, and economic development needs in Rockford. The AAP describes how Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME) and Emergency Solutions Grants (ESG) funds will be spent in 2021. The funding levels are anticipated to be similar to 2020 funding levels of \$2,171,526 for CDBG funds, \$982,370 in HOME funds, and \$184,641 for ESG funds and are contingent upon the final approval of the Federal FY 2021 budget. All plans will be submitted to the U.S. Department of Housing and Urban Development (HUD) after HUD announces final FY 2021 allocation amounts. The City is also making clarifications to the Citizen Participation Plan regarding recent amendments related to the CARES Act, including the adherence of any health and safety mitigation measures.

Plans will be available for public display and comment beginning Monday, 12/7/2020 at 8 AM through Tuesday, Jan 5, 2021 at 5 PM. The plans are available on the City's website www.rockfordil.gov. Should you have any difficulty accessing the plans, please call 779-348-7162.

City Staff encourages all interested parties, including Rockford citizens, to comment regarding housing and community development needs, including priority non-housing community development needs and affirmatively furthering fair housing. Written comments may be addressed to Deb Dorsey, Housing and Program Manager, Dept. of Community and Economic Development, 425 East State St, Rockford, IL 61104 or emailed to deb.dorsey@rockfordil.gov, faxed to (815) 967-6933, or by using the City's payment drop box located at 425 East State Street, parking lot entrance. Envelopes must be addressed to Deb Dorsey, Dept. of Community & Economic Development.

If special arrangements need to be made to accommodate any resident in order for them to view the public hearing, including translation services, please call Rea Anderson, Community & Economic Development Dept., City of Rockford, at (779) 348-7162, to make those arrangements.

LOCALiQ

JournalStar | Journal-Standard
Rockford Register Star

PO Box 631200 Cincinnati, OH 45263-1200

PROOF OF PUBLICATION

Andrea Hinrichs
Attn: Deb Dorsey
City Of Rockford - Community & Economic Development
425 E. State St.
Rockford IL 61104

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.

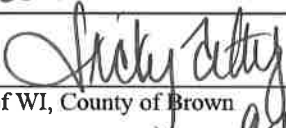
That the attached or annexed was published in the issue dated:

11/20/2021

and that the fees charged are legal.

Sworn to and subscribed before on 11/20/2021



Legal Clerk


Notary, State of WI, County of Brown
9/9.25

My commission expires

Publication Cost: \$261.80

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1

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VICKY FELTY
Notary Public
State of Wisconsin

11/20/2021
NOTICE OF PUBLIC
HEARING & DISPLAY OF
THE CITY OF
ROCKFORD'S 2022
ANNUAL ACTION PLAN,
AND AMENDMENTS TO
THE 2021 ANNUAL
ACTION PLAN AND
CITIZEN PARTICIPATION
PLAN

FOR PUBLIC COMMENT
Notice is hereby given that the City of Rockford (City) will hold a recorded virtual public hearing. Drafts of the City's 2022 Annual Action Plan (AAP), amendment to the 2021 AAP, and amendment to the Citizen Participation Plan (CPP) will be on display for public comment. The recorded public hearing will be made available for review and comment starting Monday, 12/6/2021, on the City's website at www.rockfordil.gov. The purpose of the public hearing is to summarize the 2022 AAP, the 2021 AAP amendment, and the CPP amendment.

The AAP summarizes available funding resources, as well as related proposed activities designed to meet community, housing, and economic development needs in Rockford. The AAP describes how 2022 Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME) and Emergency Solutions Grants (ESG) funds will be spent. The funding levels are anticipated to be similar to 2021 funding levels of \$2,244,583 for CDBG funds, \$987,501 in HOME funds, and \$185,222 for ESG funds and are contingent upon the final approval of the Federal FY 2022 budget. The 2022 AAP will be submitted to the U.S. Department of Housing and Urban Development (HUD) after HUD announces, and the City incorporates, the final FY 2022 allocation amounts in the 2022 AAP. In addition, the City plans to amend the 2021 AAP to include an infrastructure project for low-moderate income neighborhoods and to amend the CPP to clarify what triggers a substantial amendment. These amendments will be submitted to HUD immediately after comments have been considered.

All of the draft Plans will be made available on Monday, 11/22/2021. They will remain available for public display and comment through Tuesday, 12/21/2021 at 5 P.M. These documents may be found on the City's website www.rockfordil.gov and at the following locations: City Hall Community & Economic Development Dept. (425 E State St - 2nd floor), City Health & Human Services Dept. (612 N Church St), the Rockford Housing Authority (223 S Winnebago St), and the following Rockford Public Library locations (214 N Church St, 1238 S Winnebago St, and 6685 E State St). Should you have any difficulty accessing any of the drafts, please call 779-348-7162.

City Staff encourages all interested parties, including Rockford citizens, to comment regarding all of the draft Plans. Comments will be taken into consideration as the Plans are finalized by the City. Written comments may be addressed to Deb Dorsey, Housing and Program Manager, Dept. of Community and Economic Development, 425 East State St, Rockford, IL 61104 or emailed to deb.dorsey@rockfordil.gov, faxed to (815) 967-6933, or dropped off at the Dept. of Community & Economic Development located on the 2nd Floor at City Hall (425 East State St).

If special arrangements need to be made to accommodate any resident in order for them to view the public hearing, including translation services, please call Rea Anderson, Community & Economic Development Dept., City of Rockford, at (779) 348-7162, to make those arrangements.

From: Deb Dorsey
Sent: Tuesday, December 29, 2020 4:08 PM
To:
Subject: RE: City of Rockford – 2021 Annual Action Plan and Virtual Public Hearing

Hi

Thank you for taking the time to review our 2021 Annual Action Plan.

We have not spent or re-allocated our budgeted 2020 Fair Housing funds. These funds are still available for programs and are in addition to the new Fair Housing budget that we are proposing for 2021.

Our staff time this year has been prioritized to administer and manage new CARES Act program funds, so we are just starting to implement programming for our 2020 entitlement grant funds. (Most of our non-CARES Act programs this year were funded by 2019 program year dollars.) I anticipate that we will be making additional programmatic decisions in the first quarter of 2021. As we begin these discussions, we would like to get feedback from you and other housing partners about the fair housing needs and priorities in our community. Although we do not have an official application period to apply for the City's Fair Housing CDBG funds, we will want to ensure that our efforts are impactful, timely, and not duplicative of other programs/initiatives in our community. I am always available to discuss potential uses of our CDBG funds to support projects or programs related to fair housing.

Thanks again. I look forward to speaking to you soon.

Best regards,
Deb

From:
Sent: Monday, December 28, 2020 8:00 AM
To: Deb Dorsey
Subject: Re: City of Rockford – 2021 Annual Action Plan and Virtual Public Hearing

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Deb,

I briefly reviewed the plans and the public hearing.

What are the plans for the fair housing funds? It looks like perhaps they were not used in 2020? Will they roll into the 2021 funds or were the funds reallocated? When does the City open up applications for the 2021 CDBG funds? It seems like the funding timing changes quite a bit due to HUD's actions.

Best,

From: Deb Dorsey
Sent: Thursday, December 17, 2020 11:58 AM
To:
Subject: RE: 2021 action plan

Hi ,

Thanks for your great questions and feedback regarding the City's proposed 2021 Annual Action Plan. I appreciate your patience in my reply, as I wanted to get feedback from several other departments and compile a single response for you. My responses are below, in blue.

If you have any additional questions, please let me know. I know you have been in contact with our Neighborhood Specialist, Barb Chidley, and she is also a great resource for our neighborhood residents and associations.

Thank you again for your feedback.

Deb Dorsey

Housing and Program Manager
City of Rockford – Community & Economic Development Dept.
425 E. State Street, Rockford, IL 61104
Phone: 779-348-7442
Fax: 888-789-0621

The opinions expressed here are my own and do not necessarily represent those of the City of Rockford, IL.

-----Original Message-----

From:
Sent: Friday, December 11, 2020 12:40 PM
To: Deb Dorsey <Deb.Dorsey@rockfordil.gov>
Subject: 2021 action plan

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Deb. I'm from the Shaw Woods neighborhood. I do have a few questions about the action plan. I did see in the PowerPoint that CDBG funds can be used for code enforcement. At this point in time we only have 4 full time employees in that department and 3 interns if they are still assigned, to cover the whole city, which doesn't seem like enough. Also with our code enforcement officers they are currently being used to enforce COVID19 restrictions. I have personally have had a meeting with the department about developing a code enforcement volunteer program. So my question is can we obtain more funding for this department so they increase personnel or have the funds they need to be proactive than reactive in enforcing the city codes, aid in developing a volunteer program and improving the beautification of our city.

RESPONSE:

Code Enforcement in the City is traditionally staffed by 4 full-time inspectors, who respond to reports of violations, as well as engage in proactive work, as time allows. During the summer months, professional staff are supplemented by several interns who assist with weeds/tall grass enforcement. The division also employs a full-time Neighborhood Stabilization Officer – a position less than a month old – in an effort to have a person overseeing the response to various neighborhood concerns and assist with the implementation of City programs, such as the Vacant and Foreclosing Property Registry. While the staffing appears to be low, data has demonstrated that the current levels are more than adequate to respond to complaints which arise. Over the past year, City staff have been able to decrease the time for an initial inspection to 1.2 days from submission, a decrease by 18% compared to the prior year; while seeing increases of 45% in submitted service requests and 50% in proactive cases started.

The City has used CDBG funds in the past to help support Code Enforcement efforts in CDBG-eligible areas. (A CDBG-eligible area is a census tract in which 51% of the households are low-moderate income.) As time has passed, the City taken a more proactive approach and has re-allocated CDBG funds from Code Enforcement efforts to housing rehabilitation programs, which assist low-moderate income homeowners rehabilitate their homes.

Thanks for your interest in developing a volunteer code enforcement program! The enlistment of volunteers to assist with code enforcement can prove to be a significant benefit and is a program which the City is actively exploring. The role of volunteers in assisting with the reporting of violations, as well as in supporting large-scale events and outreach efforts, will assist in focused compliance efforts. These efforts could include important public-safety measures, such as ensuring that houses have proper numbering to be identified by emergency response personnel. As soon as our Neighborhood Stabilization staff is ready to move forward with this type of program, they will contact you to discuss details about how this program can be implemented.

I have noticed that some residents have large exterior problems such as chipped paint on the majority of their homes. Multiple broken windows. Structural compromise with balconies or wooden front porches. I understand these projects can be extremely pricy for the homeowners. Do these grants help homeowners with these type of problems? Also does the city have contracted contractors (painters, carpenters, windows) or loan programs to get those problems solved?

RESPONSE: As mentioned above, the City started using CDBG funds in 2019 for housing rehab programs, which can address code violation issues like you have mentioned. The City has used its HUD-funded HOME grants since 1992 to provide housing rehabilitation programs to income eligible homeowners. The City has also been awarded numerous grants through IHDA (Illinois Housing Development Authority) to assist with housing rehab programs as well. The City's demolition program is in place to address those buildings which are unsafe, vacant, blighted and cannot be rehabilitated. The City's CDBG funds support the demolition program, and we continue to seek additional resources to address blighted and unsafe properties in our neighborhoods.

Our department does work with contractors who meet the City's procurement policies and have met all of the necessary licensing and certifications, most notably being Lead Certified. We are always looking to recruit new contractors to include in our rehab programs. If you know of any contractors who are interested in being a part of our housing rehab programs, please let me know, and our staff can work with them directly to explain the programs and necessary requirements.

Can we use these funds to solve/ fix or is there any plan for the increase of panhandlers in the city. Also stopping other city's from transporting their homeless to our city. What are some of the relocating plans that are in place for those not succeeding in our area?

RESPONSE: While homeless persons do occasionally panhandle, many panhandlers are actually housed and panhandle to meet basic needs, substance abuse issues, etc. In general, most homeless persons in our community are currently connected to an agency or to active outreach and are having their needs met this way. The City has an outreach person in the Human Services Department who regularly stops and talks with panhandlers to determine if they are homeless so they can be linked to housing services. Very few of the panhandlers are homeless, most are housed persons stating they are homeless so that people will give them money.

There was a brief period during Chicago's deconstruction of Cabrini Green and other public housing that our community saw an increase in persons porting housing vouchers to our community. Homeless persons, just like all other Americans, are protected by the "Right to Travel" under Civil Rights law. Just as a housed citizen can decide to live somewhere else, an unhoused person can also move at will. Our Single Point of Entry for the Homeless does prioritize persons who have current or previous local residency, with the exception of domestic violence victims who may flee from another community for safety. Any literally homeless person (whether living on the streets or in a shelter) who wants to move somewhere else in order to become housed, enter treatment or move in with supportive family/friends who can demonstrate a support system willing to accept them is provided assistance to relocate.

Will any of these programs help with developing street lights or sidewalks? We do have a few busy streets here within the Shaw Woods neighborhood and lots of kids who walk to school, especially guilford high school. I do believe it would be a

safer option to have sidewalks than having kids walk in the streets. Also we do have Edgebrook shopping center not far from here and having walkable access would be good economic and community development.

RESPONSE: Great questions about walking routes and accessibility. Generally speaking, CDBG funds can be used to assist with public improvements, such as sidewalks or streetlights, if 51% of the residents in the area that benefit from the public improvement are low-moderate income. CDBG funds would not be eligible to address public improvements in the Shaw Woods neighborhood, as it is not considered a CDBG-eligible area of the City. In terms of overall neighborhood improvements, the City has invested \$1 million in neighborhood infrastructure. In addition, ComEd is currently in the process of completing a five year conversion project to LED streetlights. This project will decrease cost, as well as increase illumination in our community. The City's Public Works department manages the City's overall Capital Improvement Plan (CIP) and additional details can be found [here](#) on the City's website.

Sorry for the long email. I hope to hear from you soon. Thank you for your time.

Sent from my iPhone



CITIZEN PARTICIPATION PLAN

CITY OF ROCKFORD COMMUNITY PLANNING AND DEVELOPMENT PROGRAMS

Effective December 2020

CITY OF ROCKFORD
COMMUNITY PLANNING AND DEVELOPMENT PROGRAMS
CITIZEN PARTICIPATION PLAN

Overview

The City of Rockford (City) is an entitlement community under the U.S. Department of Housing and Urban Development (HUD) Community Planning and Development (CPD) Programs. The CPD Programs awarded to the City are Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grants (ESG).

The administration of all CPD Programs is a function of the Community and Economic Development Department (CEDD), granted through a policy directive from the City of Rockford City Council. Even though the elected City officials have unrestricted responsibility and authority for these CPD Programs, the City recognizes Rockford citizen involvement in the decision making process is of greater benefit to all parties in the development and implementation of each program's goals and objectives.

In order to provide Rockford citizens with opportunities to participate in an advisory role in planning, implementing, and assessing the CPD Programs, the City will provide adequate information to the citizens of Rockford, hold public hearings to obtain views, and provide an opportunity to comment on the City's performance. The Citizen Participation Plan was developed as a mechanism to address those concerns.

Purpose

The purpose of the Citizen Participation Plan (Plan) is to identify the process, procedures, and policies to be followed by the City regarding the involvement of the citizens of Rockford in its CPD Programs. While the Plan is designed to meet the federal regulations associated with each, it has been expanded beyond those requirements to further enhance the participation of the citizens of Rockford. Nothing in the Plan, however, shall be construed to restrict the responsibility and authority of the City officials for the development of the application and the execution of its CPD Programs.

This plan outlines the means by which Rockford citizens can actively participate in the CPD planning process, which includes, but is not limited to, the development of the plans, substantial amendments to the plans, and any performance reports. In all instances, citizen participation will be conducted in an open manner, with freedom of access for all interested persons. Citizens of Rockford will be provided adequate and timely information that enables them to be meaningfully involved in the planning process.

**CITY OF ROCKFORD
COMMUNITY PLANNING AND DEVELOPMENT PROGRAMS
CITIZEN PARTICIPATION PLAN**

Participation

All residents, particularly low-income residents who are the primary clients for the CPD Programs, public housing, and tenant-based assistance, and all protected classes are encouraged to submit comments, views, and proposals regarding the City's CPD Programs. Protected classes, according to the federal Fair Housing Act, along with the Civil Rights Act of 1968 are as follows: race, color, national origin, religion, sex, disability, and familial status. Familial status refers to households with children, households seeking custody of children, or women who are pregnant. Additional protected classes according to Illinois fair housing law include ancestry, age, military or military discharge status, marital status, protective order status, and sexual orientation.

The City also encourages local and regional public agencies, business, developers, community and faith based organizations, and other interested parties to participate.

All comments resulting from a publication and/or the public hearing(s) will be considered by the City prior to final submission of any plan or report.

CEDD is required to provide for technical assistance to groups representative of lower income residents that request such assistance in developing proposals for funding assistance under the consolidated plan.

CEDD staff is available for questions and comments regarding CPD documents and may be reached by telephone at 779-348-7162 or in person at City of Rockford City Hall, 425 E State St, 2nd Floor - Community & Economic Development Department.

Access to Information

Residents, public agencies, and other interested parties, including those most affected, will have the opportunity to receive information, review, and submit comments on any proposed submission concerning the CPD programs. This includes, but is not limited to, budget; i.e., funding amounts and activities to be undertaken. The City must follow the Uniform Relocation Act of 1970, and therefore, intends to minimize displacement of persons and to assist any persons displaced when developing and carrying out budgets and plans.

The City intends to ensure all adopted documents are accessible to all. Therefore, they will be available via the City's website at www.Rockfordil.gov. Upon request, the CEDD will make reasonable accommodations for residents unable to view via website.

CEDD shall maintain records to demonstrate compliance with the Citizen Participation Plan. The availability of these records and information shall be consistent with applicable State and local laws regarding personal privacy and obligations of confidentiality.

**CITY OF ROCKFORD
COMMUNITY PLANNING AND DEVELOPMENT PROGRAMS
CITIZEN PARTICIPATION PLAN**

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 activities not previously described in the applicable 5-year consolidated plan.
2. Increases or decreases in grant dollars or activity dollars that cumulatively totals thirty (30) percent of that program year’s grant allocation, and as amended (i.e., the Annual Action Plan).

Amendments using National Objective of Urgent Need:

It may be necessary to amend the consolidated plan in the event of an emergency such as a natural disaster. These amendments may include funding new activities and/or the reprogramming of funds including canceling activities to meet community development needs that have a particular urgency. A substantial amendment does not include amendments to meet this National Objective of Urgent Need. 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

CITY OF ROCKFORD
COMMUNITY PLANNING AND DEVELOPMENT PROGRAMS
CITIZEN PARTICIPATION PLAN

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 the local newspaper(s) prior to the submittal to HUD. This notice will provide the following:

- A short summary of the document
- Details of the comment period (30 days for plans and substantial amendments, 15 days for performance reports)
- List of locations of where copies of the entire plan or report may be examined and
- List of public hearing dates and locations

The City will provide electronic and written marketing communications at least two weeks in advance of a Public Hearing.

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, review of program performance, and announce if the City plans to access pre-award costs as allowed by the Uniform Administrative Requirements, Cost Principles and Audit Requirements regulation, at 2 CFR Part 200. At least one of the hearings will be held before the proposed document is published for comment.

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

**CITY OF ROCKFORD
COMMUNITY PLANNING AND DEVELOPMENT PROGRAMS
CITIZEN PARTICIPATION PLAN**

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.

Grievance, Complaints and Objections

Any person or group feeling aggrieved in connection with the equal opportunity requirements of the Housing & Community Development Act of 1974, as amended, with respect to any portion of the local Community Development Program or any of its project activities, shall present those grievances in written form to the Director of the City of Rockford's Department of Community and Economic Development. The director will make every effort to provide a written decision on the grievance within 15 working days of a written complaint. If the aggrieved person feels the decision by the director is not acceptable, they may submit the written complaint to the Mayor of the City of Rockford. The Mayor will attempt to respond in writing within 15 days of receipt of the written complaint.

CITY OF ROCKFORD
COMMUNITY PLANNING AND DEVELOPMENT PROGRAMS
CITIZEN PARTICIPATION PLAN

If the person submitting the grievance continues to feel unsatisfied, the Department will assist them in pursuing to submit and have their grievance heard by the Department of Housing and Urban Development. The area office, the regional office, and finally the central office will be exhausted in that order. The decision of the central office of the Department of Housing and Urban Development will be final.

A record of each grievance received by the Department's director will be maintained. Included within the record will be:

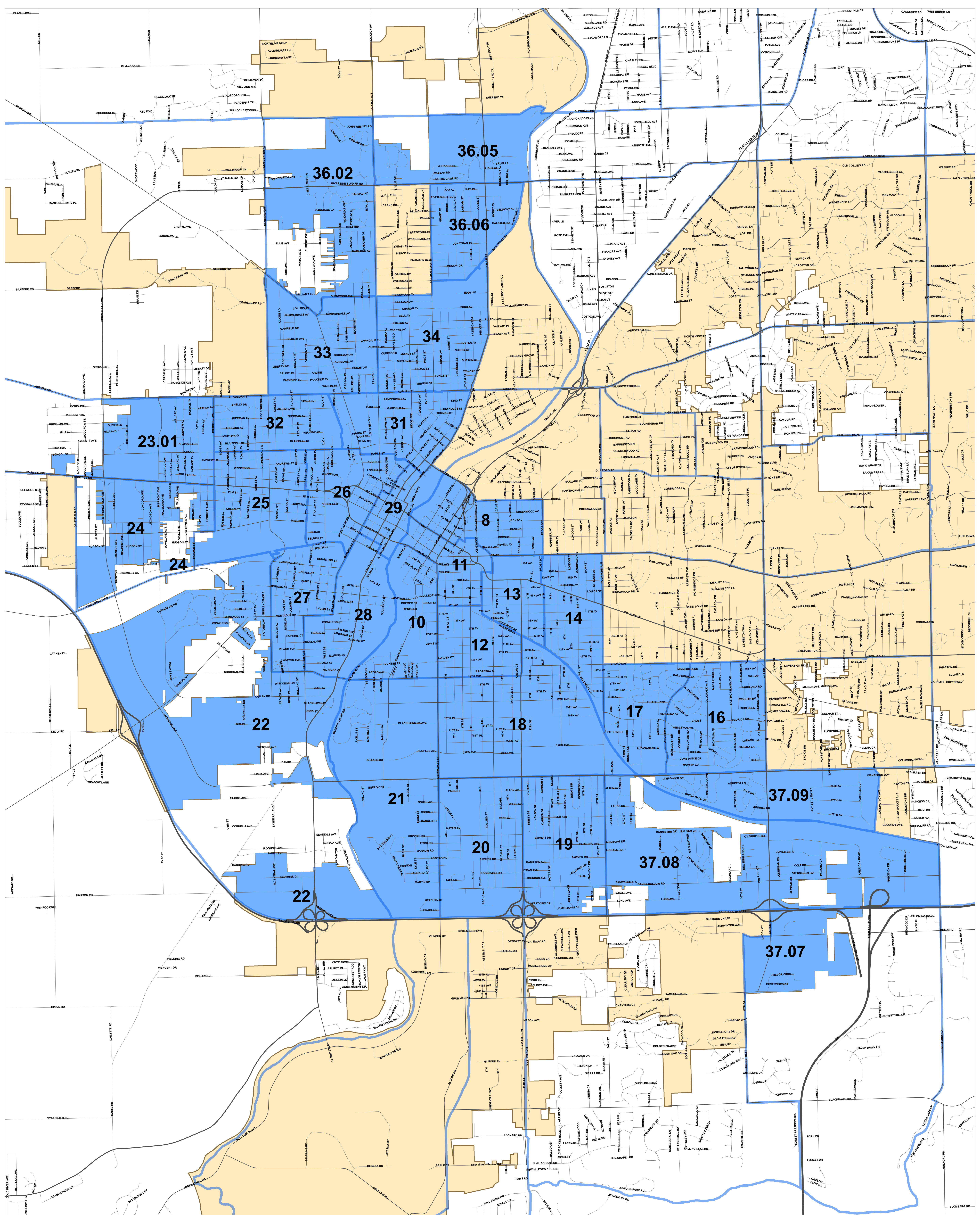
- 1) Name of person or persons alleging grievance.
- 2) Date of receipt.
- 3) Nature of the grievance.
- 4) Action taken by the Department.
- 5) Action taken by the local governing body.
- 6) Final disposition of the grievance.

City of Rockford

2021 Annual Action Plan

Appendix

- Maps
- City of Rockford Resale/Recapture Policy
- Written Standards & Administrative Plan for ESG
- Excerpt from 2021 Annual Action Plan Draft



2021 CDBG Area

Low-to-Moderate Income Level by Census Tract

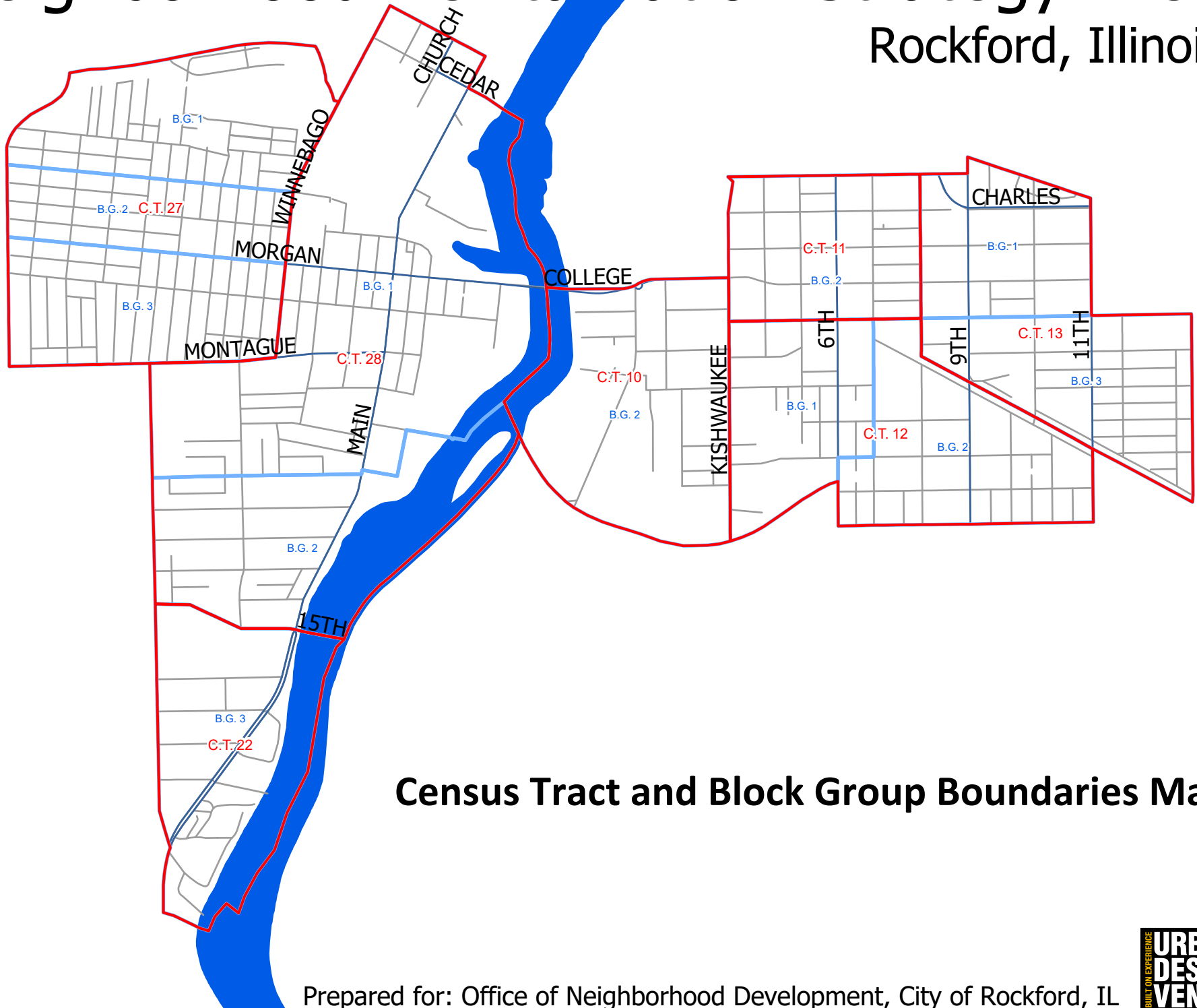
- Low-to-Moderate Income
- Rockford Municipal Boundary

0 0.5 1 2 Miles

Map Produced by: City of Rockford on 4/15/2021

Neighborhood Revitalization Strategy Area

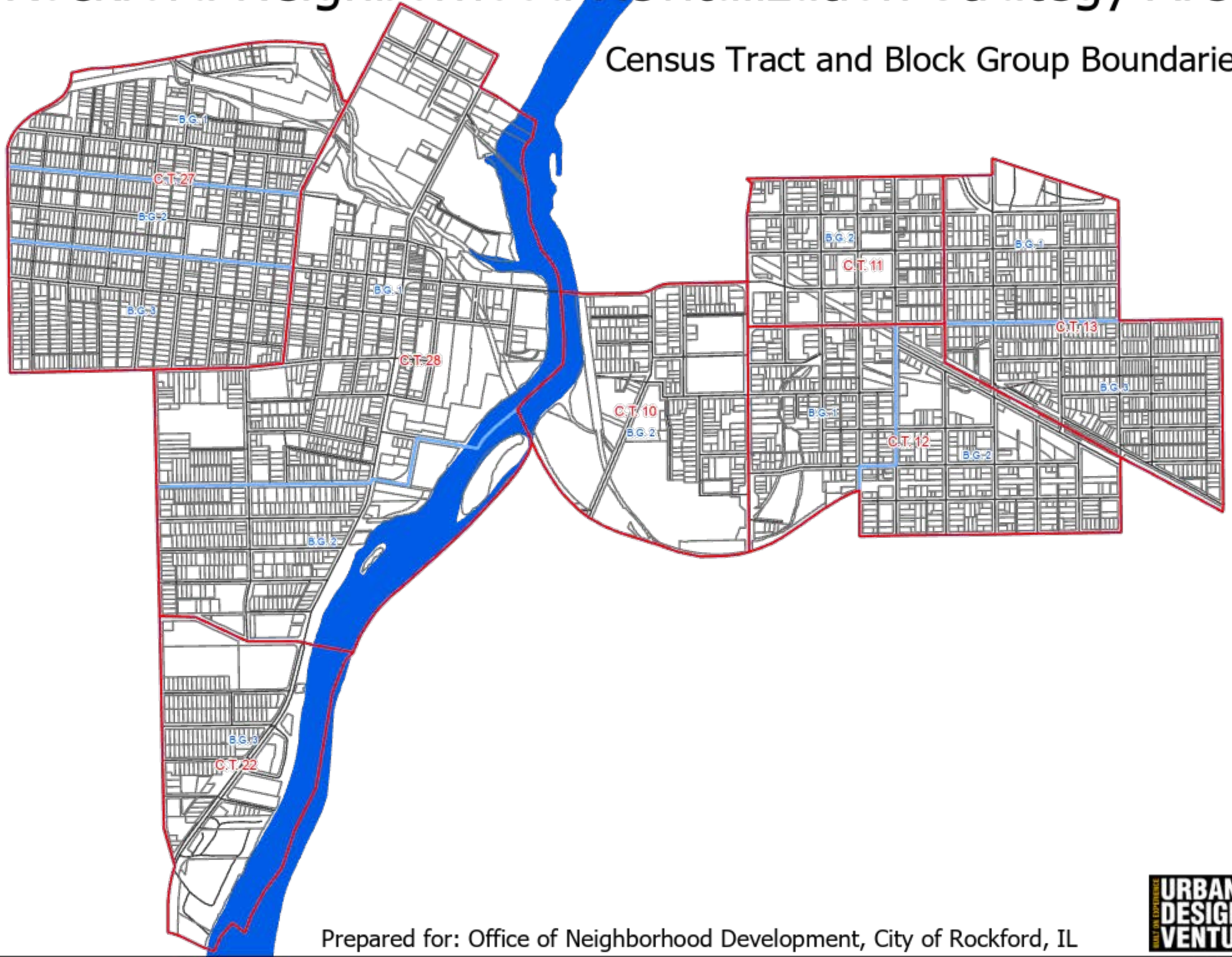
Rockford, Illinois



Census Tract and Block Group Boundaries Map

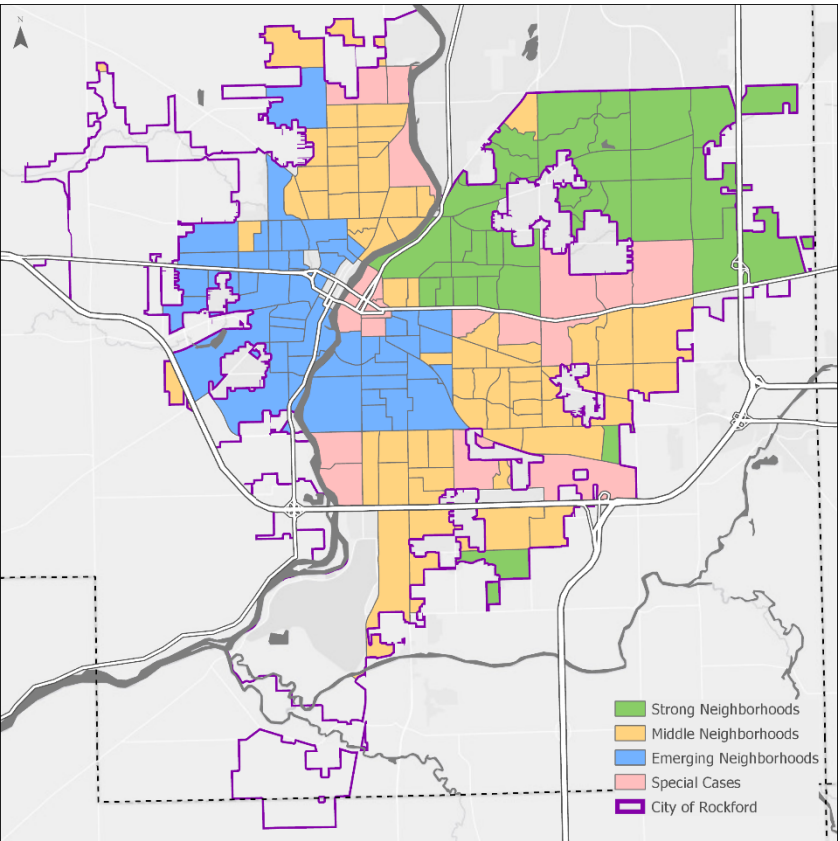
Rockford Neighborhood Revitalization Strategy Area

Census Tract and Block Group Boundaries



Prepared for: Office of Neighborhood Development, City of Rockford, IL

2020 Rockford Neighborhood Revitalization Typology



Overview

The 2020 Rockford Neighborhood Revitalization Typology was created to facilitate the development of a neighborhood revitalization strategy by grouping neighborhoods according to how similar they are to one another across a range of strategy-relevant characteristics. In all, the strategy covers twelve neighborhood types (described in detail in the sections below) that are grouped together into three main market groups – Strong, Middle, and Emerging markets, each of which consists of two to five neighborhood types. In addition, a fourth group - Special Cases – was created that consists of commercial corridors, the downtown and other areas whose character will require consideration beyond the scope of this work. Map 1 (see page 3) shows the four primary neighborhood groups for Rockford with more detailed maps of the twelve neighborhood types in the corresponding sections below.¹

The primary intention in creating this typology was to provide a starting point for associating the wide range of neighborhood revitalization strategy options with areas of Rockford that will most benefit from them and result in an efficient allocation of public resources. Neighborhoods that are similar to each other across these 10 dimensions will benefit from similar neighborhood revitalization approaches and thus enable the creation of common menus of strategies and targeting approaches

That said, no city-level analysis can capture every characteristic and eccentricity of every neighborhood, so we do not view this as a replacement for more detailed neighborhood assessments that multiple local Rockford groups are already undertaking. Instead, we see this as a higher-level complement to that more detailed and necessary neighborhood-specific work that will further inform neighborhood-level strategies as these assessments become available.

The 2020 Rockford Neighborhood Revitalization Typology was created using machine learning technology based on data collected from a variety of city-provided and public data sources that capture ten dimensions of neighborhoods (defined herein as a census block group) as follows:

- Home sale prices in 2019
- The change in home sale prices since 2008
- Code violations
- Foreclosures
- Building vacancy
- Land vacancy (other than parks and other intentionally vacant spaces)
- The share of parcels that have received more-than-typical investments in property improvements
- The homeownership rate
- The presence of commercial or institutional land uses
- The presence of project-based housing subsidies (used largely to identify Special Case areas)

Strong Neighborhood types tend to have higher homeownership rates and home values, lower levels of distress (building and lot vacancies, foreclosures and code violations) and be home to owners and landlords that are willing to invest to maintain and improve their properties. These markets are places where the city and its partners can build on existing strengths and assets, expand existing positive momentum, and support quality of life for residents in these places.

Emerging Neighborhood types tend to have lower homeownership rates and home values, along with substantially higher levels of distress than other parts of the city – more vacancies, more foreclosures, more properties with code violations. These are neighborhoods where there are multiple interrelated issues that will need to be addressed using concerted and likely long-term efforts. Despite existing signs of distress, emerging neighborhoods have a number of committed neighborhood groups, areas showing active investment and redevelopment opportunity sites that can form the basis for broader improvement efforts.

Middle Neighborhood types fall somewhere in between Strong and Emerging neighborhoods with characteristics more closely resembling the city as a whole – moderate values and moderate levels of distress. These are places where significant progress can be made on a shorter time scale if appropriate strategies are pursued and resources targeted accordingly. On the other hand, these are the neighborhoods that may be most susceptible to decline in the absence of an effective neighborhood revitalization effort.

As mentioned above, **Special Neighborhood** types are those areas that were identified as being different enough from other neighborhoods that they likely need a different kind of strategy framework than the one provided here. These include the downtown area, areas with intensive commercial or institutional developments where additional research and engagement would be needed to identify appropriate strategies. In addition, this includes areas with very high levels of project-based housing subsidies, since these areas will have irregular housing market characteristics and may require a more in-depth partnership strategy with affordable housing owners. For this reason, these areas are not discussed in the strategy sections that follow.

Revitalization Strategies by Neighborhood Type

The following sections build on the neighborhood typology to provide implementation recommendations designed to address specific characteristics of each group of neighborhoods – Emerging, Middle and Strong. Using the typology’s neighborhood categories as a starting point, the neighborhood-specific recommendations incorporate stakeholder input to present a comprehensive approach to neighborhood revitalization that spans a diverse set of programmatic areas and initiatives. Strategic initiative categories include:

- Housing;
- Vacant properties and lots;
- Neighborhood placemaking;
- Community connection; and
- Crime and safety.

Recommendations for each category of neighborhoods have been designed to 1) ensure a high quality of life in Rockford neighborhoods; and 2) strengthen the residential real estate market. Community members and advocates directly contributed input into resident priorities and provided a foundation to formally understand the existing character and social climate within neighborhoods. Overarching strategic goals that underly this neighborhood revitalization strategy include:

Ensure a high quality of life in neighborhoods

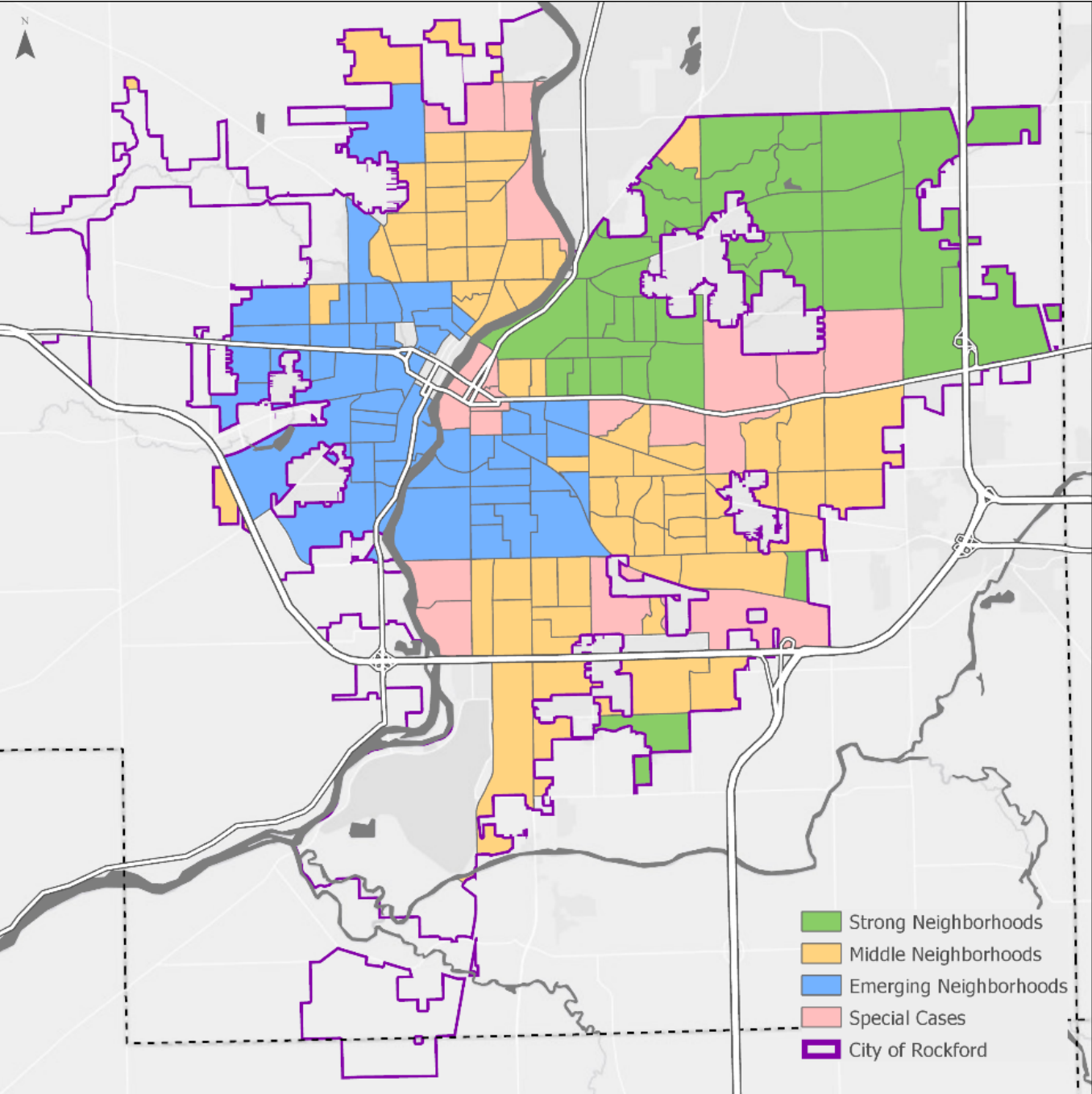
- Heighten neighborliness, community connection and civic participation
- Increase neighborhood safety – both real and perceived
- Ensure access to neighborhood amenities and connections to broader city programs and events
- Foster neighborhood pride

Strengthen the residential real estate market

- Spur investment in rehabilitation to preserve Rockford’s architectural character and provide safe, high-quality housing
- Support asset building for property owners – both owner occupants and investors
- Attract new infill development to provide additional housing options and density
- Attract new residents to Rockford
- Increase the City’s revenue base

The recommendations for the City of Rockford’s neighborhood stabilization strategy are outcome-driven and data-supported to reflect present neighborhood conditions and drive toward desired results. Outcomes include targeting blight and its negative impact on neighborhoods; reinforcing positive perceptions about Rockford; and developing robust outreach to foster community connection, engagement, and improved quality of life. Recognizing that Rockford’s neighborhoods include *both* real estate *and* people, the strategy includes recommendations for both place-based and people-centered initiatives.

Appendix III includes an implementation matrix with recommendations for actions, timelines, funding and partnerships to support implementation and engagement over the coming years. Leading the neighborhood revitalization effort, the City of Rockford is charged with identifying action-oriented community partners and sustaining collaboration and momentum over time.



Map 1: Rockford Market Groups

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***

April, 2017

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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"> (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; (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 (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;
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"> (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; and (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;
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"> (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); (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance; (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and (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
Fleeing/ Attempting to flee Domestic Violence	<p>(4) Any individual or family who:</p> <ul style="list-style-type: none"> (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; (ii) Has no other residence; and (iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

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.

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.

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.

1st – Third party documentation

2nd – Observation by the intake worker

3rd – 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.

1st – Source documents

2nd – Third party verification

3rd – 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, & MSA) program are included in annual income:</p> <ul style="list-style-type: none">• Qualify as assistance under the TANF program definition at 45 CFR 260.31; and• Are otherwise excluded from the calculation of annual income per 24 CFR 5.609(c). <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: the amount of the allowance or grant exclusive of the amount specifically designated for shelter or utilities; plus: 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, the cost of medical expenses for any family members
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"> a. Amounts received under training programs funded by HUD. 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). 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. 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. 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.
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"> ✦ The value of the allotment provided to an eligible household under the Food Stamp Act of 1977; ✦ 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); ✦ Payments received under the Alaskan Native Claims Settlement Act; ✦ Income derived from the disposition of funds to the Grand River Band of Ottawa Indians; ✦ Income derived from certain submarginal land of the United States that is held in trust for certain Indian tribes; ✦ Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program. ✦ Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721); ✦ 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; ✦ 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; ✦ 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); ✦ 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; ✦ 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; ✦ 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). ✦ Payments by the Indians Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation; ✦ Allowances, earnings, and payments to AmeriCorps participants under the National and Community Services Act of 1990; ✦ 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; ✦ 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 ✦ Allowances, earnings, and payments to individuals participating in programs under the Workforce Investment Act of 1998.
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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:		
Persons Counted in Household Size for the Purposes of Eligibility Calculation	Employment Income	Other Income (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
Nonmembers		
Not counted		
Foster Adult	No	No
Foster Child 18 or under	No	No
Live-in Aide	No	No
NOTE: 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 1st 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.² 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

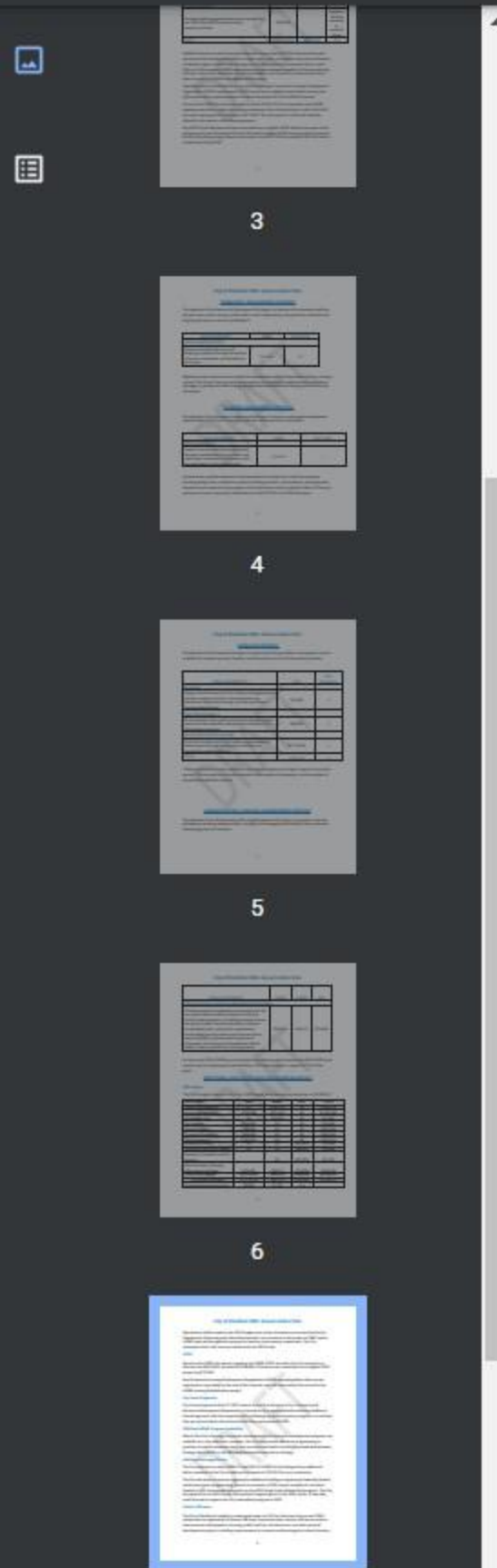
An application will require information regarding the services an organization would be able to provide, the cost of such services and a budget for all program expenditures.

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 2021 Annual Action Plan

Adjustments will be made to the 2021 budget once actual allocations are announced by the Department of Housing and Urban Development. 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 2021 funds.

CHDO

Based on the CARES Act waiver regarding the HOME CHDO set-aside, the City intends to re-allocate the 2018 CHDO set-aside of \$148,863, if funds are not committed to an eligible CHDO project by 8/7/2021.

Any Community Housing Development Organization (CHDO) operating dollars that are not requested or committed by the end of the calendar year will automatically be moved to the HOME Housing Rehabilitation project.

City Council Approval

City Council approval of the FY 2021 Annual Action Plan allows the City's Community & Economic Development Department to commit to all programs/activities without additional Council approval, with the exception of the following: proposed projects, programs, or activities that are not included in this Annual Action Plan and exceed \$25,000.

CDBG and HOME Program Availability

Most of the City's housing, community development, and economic development programs are available on a city-wide basis. However, the City may provide additional programming or priorities to specific planning areas, such as areas described in the Neighborhood Revitalization Strategy Area (NRSA) or the NRN Neighborhood Revitalization Strategy.

Additional Leverage/Grants

The City continues to utilize CDBG-CV and ESG-CV (CARES Act) funding and any additional dollars awarded to the City to address the impacts of COVID-19 on our community.

The City also plans to continue applying for additional funding to supplement federally-funded entitlement grant programming. Resources received in 2020 may be available for activities funded in 2021 and include such grants as the IHDA Single Family Rehab Roof program. The City also applied for an IHDA Strong Communities Program grant in late 2020, which, if awarded, could be used to support the City's demolition program in 2021.

Section 108 Loans

Grantee SF-424's and Certification(s)

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:

4. Applicant Identifier:

5a. Federal Entity Identifier:

36-6006082

5b. Federal Award Identifier:

B-21-MC-17-0020

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

City of Rockford, IL

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

36-6006082

* c. Organizational DUNS:

1366661740000

d. Address:

* Street1:

425 E. State Street

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 Dev.

Division Name:

Neighborhood Development

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

Prefix:

MS.

* First Name:

Deborah

Middle Name:

* Last Name:

Dorsey

Suffix:

Title: Housing and Program Manager

Organizational Affiliation:

* Telephone Number: 779-348-7442

Fax Number:

* Email: Deb.Dorsey@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 / 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 2021 Annual Action Plan for the Community Development Block Grant (CDBG) 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 16th

* b. Program/Project 16th

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

 17. Proposed Project:

* a. Start Date: 01/01/2021

* b. End Date: 12/31/2021

18. Estimated Funding (\$):

* a. Federal	2,244,583.00
* b. Applicant	
* c. State	250,000.00
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	2,494,583.00

*** 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

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 218, 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

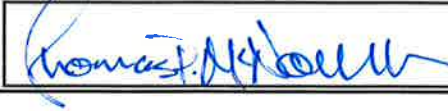
Suffix:

* Title: Mayor, City of Rockford

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

* Email: Thomas.McNamara@rockfordil.gov

* Signature of Authorized Representative:



* Date Signed: 5/26/21

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

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.

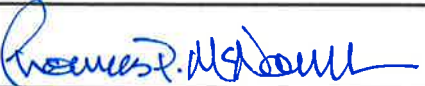
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

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
	<div data-bbox="906 1318 1495 1352" style="border: 1px solid black; padding: 2px;">Mayor, City of Rockford</div>
APPLICANT ORGANIZATION	DATE SUBMITTED
<div data-bbox="136 1451 880 1478" style="border: 1px solid black; padding: 2px;">City of Rockford</div>	<div data-bbox="906 1444 1495 1493" style="border: 1px solid black; padding: 2px;">5/26/21</div>

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:**

4. Applicant Identifier:

5a. Federal Entity Identifier:

36-6006082

5b. Federal Award Identifier:

M-21-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. Organizational DUNS:**

1366661740000

d. Address:

*** Street1:**

425 E. State Street

Street2:

*** City:**

Rockford

County/Parish:

*** State:**

IL: Illinois

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

611041014

e. Organizational Unit:

Department Name:

Community & Economic Dev.

Division Name:

Neighborhood Development

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

Prefix:

Ms.

*** First Name:**

Deborah

Middle Name:

*** Last Name:**

Dorsey

Suffix:

Title:

Housing and Program Manager

Organizational Affiliation:

*** Telephone Number:**

779-348-7442

Fax Number:

*** Email:**

Deb.Dorsey@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 2021 Annual Action Plan for the HOME Investment Partnerships Grant (HOME) 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

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:

01/01/2021

* b. End Date:

12/31/2021

18. Estimated Funding (\$):

* a. Federal

987,501.00

* b. Applicant

* c. State

* d. Local

* e. Other

* f. Program Income

7,742.50

* g. TOTAL

995,243.50

*** 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 218, 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

* Telephone Number:

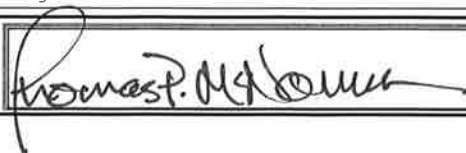
(779) 348-7333

Fax Number:

* Email:

Thomas.McNamara@rockfordil.gov04/21

* Signature of Authorized Representative:



* Date Signed:

4/21/2021

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

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.

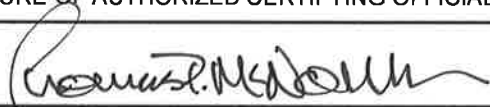
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

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, City of Rockford
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Rockford	4/21/2021

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:**

4. Applicant Identifier:

5a. Federal Entity Identifier:

36-6006082

5b. Federal Award Identifier:

E21-MC-17-0020

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

City of Rockford, IL

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

36-6006082

*** c. Organizational DUNS:**

1366661740000

d. Address:

*** Street1:**

425 E. State Street

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 Dev.

Division Name:

Neighborhood Development

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

Prefix:

Ms.

*** First Name:**

Deborah

Middle Name:

*** Last Name:**

Dorsey

Suffix:

Title:

Housing and Program Manager

Organizational Affiliation:

*** Telephone Number:**

779-348-7442

Fax Number:

*** Email:**

Deb.Dorsey@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 Grants 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 2021 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 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: 01/01/2021

* b. End Date: 12/31/2021

18. Estimated Funding (\$):

* a. Federal	185,222.00
* b. Applicant	
* c. State	
* d. Local	185,222.00
* e. Other	
* f. Program Income	
* g. TOTAL	370,444.00

*** 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

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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 218, 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

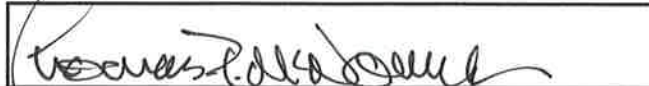
Suffix:

* Title: Mayor, City of Rockford

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

* Email: Thomas.McNamara@rockfordil.gov

* Signature of Authorized Representative:



* Date Signed: 4/21/2021

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

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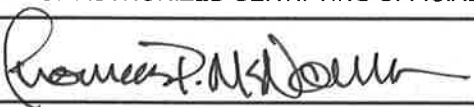
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As the duly authorized representative of the applicant, I certify that the applicant:

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.
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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.
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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.
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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, City of Rockford
APPLICANT ORGANIZATION City of Rockford	DATE SUBMITTED 4/21/2021

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.

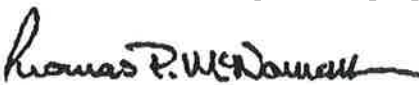
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

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



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) 2020, 2021, 2022 [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.

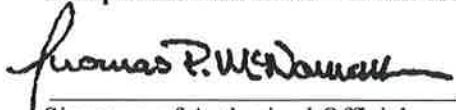
Excessive Force -- It has adopted and is enforcing:

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

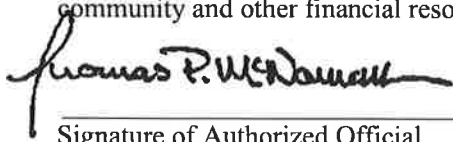
8/20/21
Date

Mayor, City of Rockford
Title

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which 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 to meet such needs.



Signature of Authorized Official

8/20/21
Date

Mayor, City of Rockford

Title

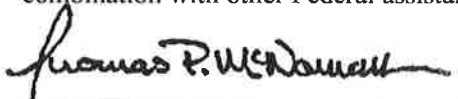
Specific HOME Certifications

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

8/20/21
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

8/20/21

Date

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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.