



City of Rockford

2022 Annual Action Plan

Submission Timeline	
8/5/2022	Annual Action Plan (AAP) submitted to HUD (includes a substantial amendment made public April 2022)
9/9/2024	AAP submitted to HUD after completing two (2) minor amendments. ESG Budget prior to amendments: Housing (\$15,000), Operation/Support (\$75,000), Prevention and Re-housing (\$84,719), and Administration (\$13,962). Final ESG budget: Housing (\$23,686), Operation/Support (\$96,283), Prevention and Re-housing (\$58,181), and Administration (\$10,531).

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 2022 Annual Action Plan (AAP) for the period of January 1, 2022 through December 31, 2022. This AAP is the 3rd 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 2022 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 2022:

- HS-1 Housing Development - Increases the number of affordable housing units in the City for owners and renters by assisting with acquisition, development fees, construction, and rehabilitation.

- HS-2 Housing Rehabilitation - Continues to assist with rehabilitating existing affordable housing units occupied by owners and renters in the City by addressing code violations, emergency repairs, energy efficiency improvements, and handicap accessibility.
- HS-3 Homeownership - Continues to assist low- and moderate-income homebuyers to purchase homes by providing direct subsidies which include but are not limited to down payment and closing cost assistance including housing counseling fees, interest subsidies, etc.
- HS-4 Fair Housing - Promotes fair housing choice through education, testing, training, and outreach in the City of Rockford.
- HS-5 Project Delivery - Provides eligible program delivery and oversight for the CDBG and HOME funded housing projects/activities.
- HMS-1 Housing - Supports the Continuum of Care's efforts and applicants to provide emergency shelter, transitional housing, permanent supportive housing, and other permanent housing opportunities.
- HMS-2 Operation/Support - Assists providers who operate housing or provide support services for the homeless and persons or families at-risk of becoming homeless.
- HMS-3 Prevention and Re-Housing - Assists the Continuum of Care's efforts in prevention of homelessness through anti-eviction activities and program for rapid re-housing.
- CDS-2 Infrastructure - Improves the public infrastructure through rehabilitation, reconstruction, and new construction, of streets, sidewalks, bridges, curbs, walkways, water, storm water, sanitary sewer, handicap accessibility improvements/removal of architectural barriers, etc.
- CDS-6 Clearance/Demolition - Removes and eliminates slum and blighting conditions through clearance and demolition of vacant, abandoned, and dilapidated structures.
- EDS-2 Economic Development - Supports business and commercial growth through rehabilitation of store fronts and retail space, expansion of businesses, and the development of new businesses.
- AMS-1 Overall Coordination - Provides program management and oversight for the successful administration of Federal, State, and locally funded programs, including planning services for special studies, annual action plans, five year consolidated plans, substantial amendments, consolidated annual performance and evaluation reports (CAPER), environmental reviews and clearances, fair housing, and compliance with all Federal, State, and local laws and regulations.

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

3. Evaluation of past performance

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

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

Upon each year's completion, goals and strategies are re-assessed to ensure outcomes are meeting the needs of the target population. In addition, ongoing outreach allows target populations to share perspectives. This assessment helps to evaluate program performance. 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.

Rockford has followed its Citizen Participation Plan in the planning and preparation of the Annual Action Plan (AAP). Two (2) recorded virtual public hearings were held. The first virtual public hearing was recorded and made available for public review and comment on the City's website at www.rockfordil.gov on or before 10/30/2021. This Public Hearing provided interested parties, including Rockford Citizens, with a summary of programs and activities currently funded by CDBG, HOME, and ESG 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 "Rockford Register Star," on October 16, 2021.

The second public hearing was recorded and made available for public review and comment on the City's website at www.rockfordil.gov starting December 6, 2021. This public hearing summarized details of the draft plans and invited interested parties to review and comment on the draft documents. The City of Rockford advertised the Public Hearing in its local newspaper, the "Rockford Register Star," on November 20, 2021.

In addition to the Rockford Register Star publication, information about both public hearings and the availability of the drafts for public review and comment were provided to the City of Rockford Community and Economic Development Department (CEDD) internal contact list for housing, economic development, and community development organizations. This list includes, but is not limited to, economic development, fair housing, homeless and housing agencies, and neighborhood organizations.

Drafts of the City's 2022 AAP and Citizen Participation Plan (CPP) were on display for review and comment for a 30-day period beginning November 22, 2021 and ending on December 21, 2021. The AAP draft included anticipated funding resources, as well as related proposed activities designed to meet housing, homeless, community and economic development needs in Rockford.

The drafts were made available for public review at the following locations:

- City of Rockford, Community & Economic Development Department - 425 E. State Street
- City of Rockford website, www.rockfordil.gov
- City of Rockford, Health and Human Services Office - 612 N. Church Street
- Rockford Housing Authority main office - 223 S. Winnebago Street
- Rockford Public Library locations as follows:
 - 214 N Church Street
 - 1238 S Winnebago Street
 - 6685 E State Street

Substantial Amendment:

The 2020-2024 Consolidated Plan and 2022 Annual Action Plan were amended to address program income (PI) and disposition of four properties related to the Neighborhood Stabilization Program (NSP1) funding. The NSP1 grant PI will become Community Development Block Grant PI and the disposition of the properties will be carried out according to CDBG regulations.

A recorded virtual public hearing and a draft of a Substantial Amendment was available for public comment and review from April 25, 2022 to May 25, 2022. Locations to view the drafts were the same as listed above. The City of Rockford advertised the Public Hearing in its local newspaper. The ad appeared in the "Rockford Register Star" on April 24, 2022. In addition to the local newspaper, the City's CEDD internal contact list was sent information about the hearing and drafts of the amendment being available for public review and comment.

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 2022 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 2022 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 (1/1/2022 through 12/31/2022) 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, Community & Economic Development Department - 425 E. State Street
- City of Rockford website, www.rockfordil.gov

- City of Rockford, Health and Human Services Office - 612 N. Church Street
- Rockford Housing Authority main office - 223 S. Winnebago Street
- Rockford Public Library locations as follows:
 - 214 N Church Street
 - 1238 S Winnebago Street
 - 6685 E State Street

The 30-day display period started on November 22, 2021 and ending on December 21, 2021. Two (2) recorded virtual public hearings were held; first on October 30, 2021 and the second on December 6, 2021. Upon completion of the 30-day comment period and the federal allocation of 2022 funds, the City of Rockford submitted the FY 2022 Annual Action Plan to the U.S. Department of Housing and Urban Development Chicago Office.

On April 24, 2022, notification of a Substantial Amendment was made to the public. The recorded virtual public hearing and a draft of the amendment was available for public review and comment from April 25, 2022 to May 25, 2022.

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	Health and 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

Sarah Brinkmann, Housing and Program Manager

City of Rockford Community & Economic Development Department, Neighborhood Development Division, 425 E. State Street, Rockford, IL 61104, 779-348-7442, Sarah.Brinkmann@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 2022 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 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 Community and Economic Development Department 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 Health & Human Services Departments. The City has built partnerships with other local agencies to provide additional financial assistance when housing projects exceed program maximums. These programs can include the Winnebago County Health Department’s Lead Program and the City’s Weatherization program, run by the Health and Human Services Department. Referrals are also made to such agencies such as NWHomeStart (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 who organizes resources from the federal government to address the housing needs of the City's lowest income households.

Both Public and Assisted Housing providers are active members of the Continuum of Care, 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 and has Emergency Housing Vouchers available to assist those with an immediate need, based on referral system through the CoC. 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 Health and Human Services Department who operates the Coordinated Entry System and manages the ESG funds. The Department is also the collaborative applicant for both CoC funds and non-federal ESG funds for the Continuum of Care. The Continuum of Care is part of the Built for Zero collaborative which trains continuums and other partners on efforts to end homelessness.

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

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. 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 and contributed as a member of the Mayor's housing initiatives group. Organization hosts 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.
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, including contributing as a member of the Mayor's housing initiatives group, 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.
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.
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.
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 works directly with City staff on outreach to its focus area neighborhoods.
15	Agency/Group/Organization	Transform Rockford/Great Neighborhoods
	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.
19	Agency/Group/Organization	COMPREHENSIVE COMMUNITY SOLUTIONS
	Agency/Group/Organization Type	Housing Services-Employment
	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, including contributing as a member of the Mayor's housing initiatives group, and has had several telephone conversations with City staff regarding federally funded housing programs.
20	Agency/Group/Organization	Region 1 Planning Council/Northern Illinois Land Bank
	Agency/Group/Organization Type	Regional organization Planning organization
	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, including contributing as a member of the Mayor's housing initiatives group, and has had several telephone conversations with City staff regarding federally funded programs.

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.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
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 2022 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 2022 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 10/30/2021 and 12/06/2021 public hearing videos had over 66 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>48 views of 10/29/2021 YouTube recording of public hearing</p>	<p>No comments received.</p>	<p>NA</p>	<p>https://www.youtube.com/watch?v=Oj9jFepLTmg</p>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
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>18 views of 12/6/2021 YouTube recording of public hearing</p>	<p>See attached appendix with public comments and responses.</p>	<p>The City accepted all comments that were received.</p>	<p>https://www.youtube.com/watch?v=iYeIHD_2Pyw</p>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	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>17 views of 4/21/2022 YouTube recording of public hearing</p>	<p>No comments received.</p>	<p>NA</p>	<p>https://www.youtube.com/watch?v=9NHGeT6i5WM</p>

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City of Rockford is receiving \$2,166,237 CDBG funds, \$1,097,631 in HOME funds, and \$188,681 in ESG funds for the FY 2022 program year. The City's program year is from January 1, 2022 to December 31, 2022. 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 2022 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	2,166,237	70,057	0	2,236,294	4,275,284	7 Projects/activities were based on the FY 2022 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	1,097,631	15,457	0	1,113,088	1,844,348	4 Projects/activities were based on the FY 2022 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	188,681	0	0	188,681	364,661	1 Project/activity was based on the FY 2022 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

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

Public:

- United States Environmental Protection Agency
- 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 a homeownership program that provides first mortgage financing and down payment assistance. These funds are provided to homebuyers through financial institutions approved by IHDA.

Local:

Some local 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 \$1,117,948 from previous years (balance documented in the 2021 CAPER). The match requirement is generally met through housing developments. However, the City does report other match funds as they become available. For homeownership, this might be volunteer labor on a Habitat home that was purchased using the City's homeownership program. For housing rehabilitation projects, this could include capital improvement completed in the area.

The City anticipates that it will have ESG match of \$188,681 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

NA

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: \$219,527	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: \$630,701 HOME: \$638,215	Homeowner Housing Rehabilitated: 50 Household Housing Unit
3	HS-3 Homeownership	2020	2024	Affordable Housing	City Wide CDBG Eligible Areas NRSA	Housing Strategy	HOME: \$149,990	Direct Financial Assistance to Homebuyers: 10 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	HS-4 Fair Housing	2020	2024	Affordable Housing	City Wide CDBG Eligible Areas NRSA	Housing Strategy	CDBG: \$10,000	Other: 1 Other
5	HS-5 Project Delivery	2020	2024	Affordable Housing	City Wide CDBG Eligible Areas NRSA	Housing Strategy	CDBG: \$413,896	Homeowner Housing Added: 1 Household Housing Unit Homeowner Housing Rehabilitated: 25 Household Housing Unit Direct Financial Assistance to Homebuyers: 10 Households Assisted Other: 1 Other
6	HMS-1 Housing	2020	2024	Homeless	City Wide	Homeless Strategy	ESG: \$23,686	Other: 1 Other
7	HMS-2 Operation/Support	2020	2024	Homeless	City Wide	Homeless Strategy	ESG: \$96,283	Other: 2 Other
8	HMS-3 Prevention and Re-Housing	2020	2024	Homeless	City Wide	Homeless Strategy	ESG: \$58,181	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: \$300,000	Buildings Demolished: 30 Buildings
21	EDS-2 Development	2020	2024	Economic Development	City Wide CDBG Eligible Areas NRSA	Economic Development Strategy	CDBG: \$271,712	Businesses assisted: 4 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: \$359,985 HOME: \$105,356 ESG: \$10,531	Other: 3 Other
25	CDS-2 Infrastructure	2020	2024	Non-Housing Community Development	City Wide CDBG Eligible Areas NRSA	Community Development Strategy	CDBG: \$250,000	Other: 1 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	HS-1 Housing Development
	Goal Description	Increase the number of affordable housing units in the City for owners and renters by assisting with acquisition, development fees, construction, and rehabilitation.
2	Goal Name	HS-2 Housing Rehabilitation
	Goal Description	Continue to assist with rehabilitating existing affordable housing units occupied by owners and renters in the City by addressing code violations, emergency repairs, energy efficiency improvements, and handicap accessibility.
3	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.
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.
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.
25	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.

Projects

AP-35 Projects – 91.220(d)

Introduction

The City of Rockford proposes to undertake the following activities with the FY 2022 CDBG, HOME, and ESG, funds.

Projects

#	Project Name
1	Administration
2	Project Delivery
3	Housing Rehabilitation
4	Fair Housing
5	Clearance/Demolition
6	Economic Development
7	Homeownership
8	Housing Development
9	CHDO Operating
10	ESG22 Rockford
11	Infrastructure

Table 7 - Project Information

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

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

- Per regulation, at least 70% of the CDBG entitlement expenditures must benefit low/mod income (LMI) persons. This may occur through

directly assisting LMI households and/or benefitting LMI persons through an area benefit.

- All of HOME and ESG program funds (except for administration, planning, and/or CHDO operating costs) must benefit low income households. The City determines that beneficiaries are low income by documenting their income or, under certain circumstances, the City is allowed to presume beneficiaries are low income.
- Local and regional plans, strategies, and initiatives (i.e. the 2020-2024 Consolidated Plan, NRSA, the 2020 Comprehensive Plan, the National Resource Network (NRN) Neighborhood Revitalization Strategy, the Capital Improvement Plan, etc.).
- The capacity of staff and partners.
- Level of need and resources available to meet those needs.
- Ability to leverage resources to provide the greatest return on investment.

The LMI National Objective is met by the following:

- Ensuring all CDBG funded housing beneficiaries meet the definition of LMI, or when located in the NRSA, 51% of the beneficiaries are LMI.
- The City has identified an infrastructure project within a service area that was determined to have more than 51% LMI households. This project is consistent with our City's Capital Improvement Plan, but could not be accomplished without the CDBG commitment.
- Most Economic Development projects will either serve LMI areas by census tract or block group, be located in a census tract or block group and poverty level greater than 20% (or 30% if including Central Business District), create or retain employment of which 51% will be held by or made available to LMI individuals or assist a LMI microenterprise development.

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

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

Priority Needs (Housing, Homeless, Other Special Needs, Community Development, Economic Development, and Administration, Planning and Management) must be designated as High or Low Priority. High Priority Needs are expected to be funded during FY2022, while Low Priority Needs may not. All are ranked High Priority, except for Other Special Needs. Other Special Needs project may be supported by other means, if

consistent with the 2020-2024 Five-Year Consolidated Plan.

There are several obstacles to addressing underserved needs in Rockford. The first is our aging housing stock, with 78% of our homes having been built before 1978. The cost to rehabilitate homes to bring them up to code is expensive due to lead-based paint requirements and the cost of deferred maintenance. In addition, there is a potential for homes to be considered historic. The materials needed to meet historic standards are usually more expensive and may need to be custom-ordered, which increases the construction time to complete the project. The combination of those two long standing issues with the recent supply chain problems and price hikes means that our projects take longer and cost more. Another obstacle is that most of the City's rehab projects will require lead licensed contractors, which are limited in supply and in high demand for other housing programs in the region.

AP-38 Project Summary

Project Summary Information

1	Project Name	Administration
	Target Area	City Wide
	Goals Supported	AMS-1 Overall Coordination
	Needs Addressed	Administration, Planning, and Management Strategy
	Funding	CDBG: \$359,985 HOME: \$105,356
	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.
	Target Date	12/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	2 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	Project Delivery
	Target Area	City Wide CDBG Eligible Areas NRSA
	Goals Supported	HS-5 Project Delivery
	Needs Addressed	Housing Strategy
	Funding	CDBG: \$413,896
	Description	Provide eligible program delivery and oversight for the CDBG and HOME funded housing projects/activities.
	Target Date	12/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	36 housing units 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 (25 units), homeownership (10 units), affordable housing (1 unit) and CHDO Operating (1 other).
3	Project Name	Housing Rehabilitation
	Target Area	City Wide CDBG Eligible Areas NRSA
	Goals Supported	HS-2 Housing Rehabilitation
	Needs Addressed	Housing Strategy

	Funding	CDBG: \$630,701 HOME: \$638,215
	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	12/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	50 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 (50 units).
4	Project Name	Fair Housing
	Target Area	City Wide
	Goals Supported	HS-4 Fair Housing
	Needs Addressed	Housing Strategy
	Funding	CDBG: \$10,000
	Description	Promote fair housing choice through education, testing, training, and outreach in the City of Rockford.
	Target Date	12/30/2022

	Estimate the number and type of families that will benefit from the proposed activities	1 other
	Location Description	City Wide
	Planned Activities	Provide education, testing, training, and outreach regarding Fair Housing topics.
5	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: \$300,000
	Description	Remove and eliminate slum and blighting conditions through clearance and demolition of vacant, abandoned, blighted, and dilapidated structures.
	Target Date	12/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	30 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 (30 Buildings).

6	Project Name	Economic Development
	Target Area	City Wide CDBG Eligible Areas NRSA
	Goals Supported	EDS-2 Development
	Needs Addressed	Economic Development Strategy
	Funding	CDBG: \$271,712
	Description	Support business and commercial growth through rehabilitation of store fronts and retail space, expansion of businesses, and the development of new businesses.
	Target Date	12/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	4 Businesses
	Location Description	Community Development Block Grant (CDBG) Eligible Area, City Wide, and Neighborhood Revitalization Strategy Area (NRSA)
7	Planned Activities	Assistance for qualified expenses for development of commercial or industrial property, including design work, mechanical systems, building materials, site readiness, and equipment. Expands micro-enterprise loan program. (4 Businesses)
	Project Name	Homeownership
	Target Area	City Wide CDBG Eligible Areas
	Goals Supported	HS-3 Homeownership

	Needs Addressed	Housing Strategy
	Funding	HOME: \$149,990
	Description	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.
	Target Date	12/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	10 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. (10 units).
8	Project Name	Housing Development
	Target Area	City Wide CDBG Eligible Areas NRSA
	Goals Supported	HS-1 Housing Development
	Needs Addressed	Housing Strategy
	Funding	HOME: \$164,645
	Description	Increase the number of affordable housing units in the City for owners and renters by assisting with acquisition, development fees, construction, and rehabilitation.

	Target Date	12/30/2022
	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.
9	Project Name	CHDO Operating
	Target Area	City Wide
	Goals Supported	HS-1 Housing Development
	Needs Addressed	Housing Strategy
	Funding	HOME: \$54,882
	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	12/30/2022
	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.
10	Project Name	ESG22 Rockford
	Target Area	City Wide
	Goals Supported	HMS-1 Housing HMS-2 Operation/Support HMS-3 Prevention and Re-Housing
	Needs Addressed	Homeless Strategy
	Funding	ESG: \$188,681
	Description	Housing: Support the Continuum of Care's (CoC) efforts and applicants to provide emergency shelter, transitional housing, permanent supportive housing, and other permanent housing opportunities. Operation/Support: Assist providers who operate housing or provide support services for the homeless and persons or families at-risk of becoming homeless. Prevention and Re-housing: Assist the CoC's efforts in prevention of homelessness through anti-eviction activities and program for rapid re-housing. Administration: Provide program management and oversight for the successful administration of the program. Administration is capped at 7.5% of the grant.
	Target Date	12/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	5 other
	Location Description	City Wide

	Planned Activities	Housing (\$23,686), Operation/Support (\$96,283), Prevention and Re-housing (\$58,181), and Administration (\$10,531)
11	Project Name	Infrastructure
	Target Area	City Wide CDBG Eligible Areas
	Goals Supported	CDS-2 Infrastructure
	Needs Addressed	Community Development Strategy
	Funding	CDBG: \$250,000
	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	12/30/2022
	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 9th 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 2022 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 2022 are as follows:

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	36
Special-Needs	0
Total	36

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	25
Acquisition of Existing Units	10
Total	36

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

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

The Rockford Housing Authority’s 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 are also enrolled in 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.

Housing Choice Voucher (HCV)

RHA serves over 1700 families through the HCV program. Within the program, 12 residents are participating in the Home Ownership program.

RHA has been granted a Moving To Work designation (MTW) through HUD's MTW expansion Cohort IV, Landlord Incentives. Utilizing this designation, RHA will provide incentives for private landlords to participate in the HCV program, which will provide HCV participants with greater choice mobility.

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, including the Home Accessibility & Barrier Removal Program for people with disabilities. In addition, the City may support applications for other funding, if the application is consistent with the needs identified in the 2020-2024 Five-Year Consolidated Plan.

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

Introduction:

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

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The City of Rockford plans to take the following actions during 2022:

- Solicit ideas and feedback about opportunities to provide fair housing training, education or programming in our community.
- Make informational brochures and other resources on fair housing rights available to residents.
- Support the efforts of the community relations commission.
- Support the efforts of fair housing groups and organizations.
- Staff will participate in fair housing training opportunities, as available.
- Continue to manage the Vacant & Foreclosed Property Registry.
- Support and encourage both private developers and non-profit housing providers to develop and construct new affordable mixed and middle income rental housing that would be located throughout the City of Rockford
- Support and encourage the rehabilitation of existing housing units in the City to create decent, safe, and sound rental housing that is affordable to lower income households
- Continue to provide local municipal funding for Code Enforcement to identify buildings and units that need to be maintained and rehabilitated in accordance with local codes
- Support homebuyer education and training programs to improve homebuyer awareness and increase the opportunities for lower-

income households to become homebuyers

- Support and provide funds for down payment assistance to lower-income households to become homeowners
- Support and encourage plans from both private developers and non-profit housing providers to develop and construct new affordable housing that is for-sale
- Support and encourage the acquisition, rehabilitation and resale of existing housing units to become decent, safe, and sound
- Support home rehabilitation programs that financially assist seniors and people with disabilities to provide a safe and accessible home in order to continue to age in place
- Support and encourage the development of accessible housing units in the City
- Continue to provide support, education, and technical assistance opportunities to minority, women owned and small businesses
- Continue to promote and encourage economic development with local commercial and industrial firms to expand their operations and increase employment opportunities
- Support and encourage private and non-profit developers and businesses to provide assets (grocery stores, services, etc.) in low to moderate income neighborhoods
- Continue to support the Mayor's housing initiative group
- Continue to support Region 1 Planning Council/Northern Illinois Land Bank and their efforts

Discussion:

NA

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 2022 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.
- Continue to leverage its financial resources and apply for additional public and private funds.
- Continue to provide services and resources to homeless individuals and households.

Actions planned to foster and maintain affordable housing

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 which will be occupied by low income beneficiaries (homeowner with or without special needs).
- **HOME Housing Rehabilitation** - Funding will increase the number of decent, safe, and sanitary single family housing which will be occupied by low income beneficiaries (homeowner with or without special needs)
- **Homeownership** - Direct homebuyer assistance is available to low-income households purchasing single family units.
- **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).
- **Public Infrastructure** - Funding will be used for reconstruction projects that include new asphalt pavement, storm sewer systems, curbs and gutters, sidewalk facilities, and upgraded bicycle level of service.
- **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 2022 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.
- Three years ago, the City created a new staff position to act as a liaison with neighborhood groups, associations, and residents. The Neighborhood Specialist facilitates networks of neighborhood associations, builds capacity of organizations and community leaders, and helps to strategize neighborhood level plans that align efforts with City programs. In 2022, this staff member is working with Public Works, Police, and Fire to coordinate neighborhood clean-up days that culminate in a resource fair and block party. The City will host six

full day events within six LMI neighborhoods.

- 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.
- Over 25 non-profit agencies have been scheduled to participate in the City's Neighborhood Improvement Initiatives as part of the door-to-door outreach and event day resource fairs.

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 Health and Human Services Department's section of the website, the City offers information on financial

assistance programs, homelessness prevention, Community Health, and information on the Continuum of Care and grant funding.

Discussion:

NA

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

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.

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

City of Rockford

2022 Annual Action Plan

- Proof of Publication/2022 Action Plan
 - October 16, 2021 – 1st publication
 - November 20, 2021 – 2nd publication
- Citizen Participation Comments and Responses
- Citizen Participation Plan
- Proof of Publication/Substantial Amendment
 - April 24, 2022 - publication



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 **October 16th, 2021**. 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 **October 16th, 2021**.

City of Rockford
Ad #RRS000289331

By:

Ashley Anderson
Legal Notice Representative
Rockford Register Star – Gannett

Publisher

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

LEGALS

CITY OF ROCKFORD COMMUNITY & ECONOMIC DEVELOPMENT PUBLIC NOTICE AND HEARING

Notice is hereby given that the City of Rockford (City) will record a virtual public hearing. The virtual public hearing will be made available for review and comment starting 10/30/2021 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 annually 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 2022 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 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.



HUD PROGRAM GRANTS 2021 UPDATE AND PLANNING FOR 2022



0:06 / 18:40



City of Rockford 2022 Annual Action Plan 1st Public Hearing

48 views Oct 29, 2021



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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.

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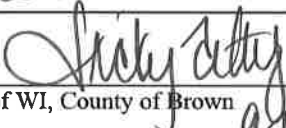
11/20/2021

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VICKY FELTY
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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.



PUBLIC HEARING
2022 ANNUAL ACTION PLAN
2021 ANNUAL ACTION PLAN AMENDMENT
CITIZEN PARTICIPATION PLAN
DECEMBER 6, 2021



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City of Rockford 2022 AAP 2nd Public Hearing 12 6 21

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Katie Couric

Andrea Hinrichs

From: Deb Dorsey
Sent: Wednesday, January 12, 2022 3:10 PM
To: Andrea Hinrichs
Subject: Public Comments - 2021 Annual Action Plan Amendment and 2022 Annual Action Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Andrea,

The public comment period for an amendment to the 2021 Annual Action Plan was November 22 – December 21, 2021. We did not receive any public comments regarding the amendment.

The public comment period for our 2022 Annual Action Plan was during the same timeframe (11/22-12/21/21). We received and accepted public comments from two individuals for the 2022 Annual Action Plan.

Thanks.

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.

Comments:

1. The Consolidated Plan is clear, well written and organized. The Consolidated Plan could be improved by being more specific, include timelines, methods for assessing effectiveness, transparency and accountability for all involved parties on a quarterly basis reporting to the community.

ANSWER:

The Consolidated Plan is completed every five years, and the City completes an Annual Action Plan each year. The City also completes a Consolidated Annual Performance and Evaluation Report (CAPER) on an annual basis, which provides an overview of the achievements and accomplishments from the most recent HUD grants program year. All of these plans are available for public review and comment before they are submitted to HUD. The most recent plans and reports related to Rockford's HUD grants are available on the City's website on the Community and Economic Development Department Reports page, found here:

<https://rockfordil.gov/city-departments/community-and-economic-development/cedd-reports/>.

2. There should be full disclosure on how each entity is connected to the City of Rockford legally and contractually. Rockford Housing Authority is portrayed as a standalone entity but it is a municipal corporation of the City of Rockford according to statute and certified by the State of Illinois Housing Agency, Illinois Housing Development Authority to be fully transparent. The Rockford Housing Authority is accountable to the City of Rockford Government and should be a leader in providing accessible, affordable, decent, safe, and sanitary Housing in Public Housing, Scattered Sites and Section 8 approved Housing affirmatively advancing the Fair Housing Act, Americans with Disabilities Act Title II and III, Section 504 of the Rehabilitation Act, Illinois Human Rights Act and City of Rockford Human Rights Ordinance.

ANSWER:

Per the Illinois statute which creates public housing authorities, Rockford Housing Authority is a separate and distinct municipal corporation. The City of Rockford Mayor appoints the RHA board, but they (RHA) are statutorily their own municipal corporation.

3. The City of Rockford must demonstrate leadership in Affirmatively advancing the Fair Housing Act, Americans with Disabilities Act Title and III, Section 504 of the Rehabilitation Act, Illinois Human Rights Act and City of Rockford Ordinance in the programs, meetings, services, activities, policies and procedures when announcing, conducting, and soliciting input into the Consolidated Plan, participating in public hearings, ensuring the website is accessible, the applications for services are accessible and/or modifiable, ask if a person is disabled, require reasonable accommodations, provide the name and complete contact information for the Equal Opportunity Officer, immediate review of every request for compliance by employees, third-party contractors, partners and Housing providers to affirmatively advance the Fair Housing Act.

ANSWER:

The City follows federal, state and local requirements when conducting public hearings and meetings.

4. The City of Rockford, Rockford Housing Authority and the Continuum of Care must implement an accessible Grievance process for individuals who request reasonable accommodations or modifications but are denied or delayed by the City of Rockford, Rockford Housing Authority, Continuum of Care Providers, Housing providers and third-party vendors to advance the Fair Housing Act. The City of Rockford Code Enforcement Ordinances and complaint process must be accessible to all, the Enforcement officers must document the investigation of the complaints, provide the complainant with updates on the investigation, the resolution with a timeline and a signed agreement from the property owner not to retaliate, intimidate or coerce or threatened to evict a tenant for filing a bona-fide Housing complaint. If the landlord refuses to bring the property to code the landlord should be assessed fines to cover costs for relocation including movers to pack, move, store, move, unpack belongings, reimbursement for all food items, vehicles, hotel stay, deposit and first month's rent, rental of any medically necessary equipment and costs for broken or lost medical supplies including medications plus get placed on a do not do business status for a minimum of one year or more with the City and Continuum of Care.

ANSWER:

The City of Rockford has a complaint process for HUD entitlement funds, which is included in the Citizen Participation Plan. Any grievances with other agencies or entities outside of the City of Rockford would need to follow their specific process. The City's Code Enforcement complaint process is as follows: Complaints can be made, in person, on the phone or via the portal on the webpage. Once a complaint comes in, an inspector is assigned and inspects the property within 24-48 hours to determine if a violation is present. While a case is open, updates can only be provided to the owner of the property. Depending on the nature of the complaint, the property owner has a certain number of days to address the violation. If the violation is not addressed within the timeframe, the complaint would go to a code hearing and potentially fines would be assessed against the property owner.

5. The City of Rockford must ensure those who receive funding for Rehabilitation, new Construction, Tax Increment Credits, grants and rental assistance comply with the Fair Housing Act and make reasonable accommodations and modifications to the programs, services, activities, policies, practices and procedures to ensure individuals with disabilities are able to enjoy the benefits.

ANSWER:

The City, as a recipient of federal funds, follows all federal regulations regarding fair housing. The City requires contractors and vendors to certify that they will adhere to the City's equal employment and anti-discrimination policies.

6. The City of Rockford needs to change the Fair Housing Ordinance to include prevention of discrimination based on sources of income as there are shortages in safe, decent, affordable and accessible housing many landlords, property management companies and relators are refusing to accept Housing Voucher Vouchers which has a disparate impact on people of color and those who are disabled.

ANSWER:

The City's Legal Department will take this under advisement and review the feasibility of the request.

7. The demographic make up of those involved in developing the Consolidated Plan should be included.

ANSWER:

The 2020-2024 Consolidated Plan was prepared in 2019 by a consultant, in conjunction with City of Rockford staff, and through a public engagement process with community residents, businesses, groups and agencies. The Annual Action Plan supports the priorities and goals identified in the Consolidated Plan and is developed by City of Rockford Community and Economic Development staff. The City presented two virtual public hearings for the proposed 2022 Annual Action Plan and provided a 30 day public comment period for the plan. The City also works directly with other housing and community development partners throughout the year and receives feedback regarding programs and services in the community. All of these partners are notified when the draft annual action plan is available for review and are encouraged to provide comments and ask for input from their clients.

8. The Community Relations Committee should have a greater public presence in the community grant access to all community members.

ANSWER:

The Community Relations Commission meetings are open to members of the public and specifically have a section of time dedicated to public comment. The meetings are also streamed online and broadcast on the local access channel. The 2022 meetings will take place on the second Thursday of the month starting at 5:30 pm on the following dates: January 13, February 10, March 10, April 14, May 12, June 9, July 14, August 11, September 8, October 13, November 10, and December 8. Information about the Community Relations Commission meeting schedules and agendas can be found on the City of Rockford's website, located here: <https://rockfordil.gov/mayors-office/crc/>

9. The Fair Housing complaint process of the should be readily available with assistance to write a Clear concise description of the complaints and a timeline for an investigation and results.

ANSWER:

The City of Rockford's Department of Law will investigate complaints related to violations of City ordinances. The City's Department of Law does not provide legal assistance to residents for the purpose of drafting legal documents, but can provide a portal to accept fair housing ordinance violation complaints. The City can also provide links to the appropriate state or federal agency for residents interested in filing a complaint for state or federal fair housing violations.

10. The staff and employees of the City of Rockford must be well trained in all antidiscrimination laws, adhere to the laws, require third-party vendors to adhere to them the laws and assist program participants with requesting and obtaining reasonable accommodations and/modifications from third-party vendors.

ANSWER:

City of Rockford personnel receive training on anti-discrimination laws, racial and cultural bias training, and sexual discrimination training. All employees are required to follow all laws, as well as the City's Rules & Regulations. The City also requires contractors and vendors to certify that they will adhere to the City's equal employment and anti-discrimination policies.

This information is provided to share my thoughts on the 2022- 2021 Annual Action Action Plan, including Substantial Amendment and Citizen Participation Plan,

- 1) CHDO; I have followed the CHDO program since 2015 when HUD changed the previous rules and regulations relative to organizations eligibility status.
 - A) I read that the City intends to fully utilize the waiver and will re-allocate the 2019- 2020 CHDO set-aside in the same manner, as of January 1, 2022. I read the amount totals \$281,727.
 - B) I recommend that when discussion begins, the under-served community be informed so there can participate in the process.

ANSWER:

Last year during the City of Rockford's 2021 Annual Action Plan process, we notified the public that HUD had suspended some of the HOME regulations as part of the CARES Act. One of these waivers was to reduce the CHDO set-aside for years 2017-2020 from 15% to 0%. At that time, we advised the public that any Rockford CHDO funds not committed to a CHDO within three years of a HOME grant allocation would be re-allocated to fund another Housing Strategy project/program. Therefore, based on this waiver, the 2017 CHDO set-aside was re-allocated during 2020, and the 2018 CHDO set aside was reallocated during 2021.

The City has not provided CHDO funds for an eligible CHDO project since 2012. The 2013 HOME Final Rule changed some of the CHDO requirements, which has made it difficult for local non-profits to meet the requirements. The City did not receive any eligible CHDO applications in 2021, and therefore made the decision to fully utilize the CHDO waiver for years 2019-2020. Any funds re-allocated from 2017-2020 CHDO set-aside will be made available to the next eligible HOME activity. Based on expenditure deadlines, the City will use the oldest available funds when a new activity is approved for funding.

The City plans to continue supporting CHDO projects. Should the City receive a qualified CHDO project, 2016 and 2021 funding is currently available for eligible CHDO projects. The City has set-aside 15% of the 2022 HOME grant allocation to eligible CHDO projects as well. In addition, regulations do not limit the City to 15% set aside, therefore, should additional entitlement funds be necessary to fund a qualified project, the City may do so, pending City Council approval.

- C) I have 10 minority Contractors and we are working with Youth Build organizations, and collaborating with the 5- 501C3 Non For Profit organizations and the City support we can create a new direction for the City of Rockford.
- D) Victory Bell, Business is presently working with a machine tool company that is seriously considering investing in the South Main business District. With help from the City we can make this happen.
- C) Barber Colman Project: I suggest that future funds for Barber Colman has a clause that includes apprenticeship programs. A partnership can be created that include Youth Bill.

ANSWER:

The City looks forward to future discussions with you about contractors and economic development opportunities. The potential developer for Barber Colman has engaged the community regarding desired development for the area.



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

Effective January 1, 2022

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

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

Amendments using National Objective of Urgent Need:

It may be necessary to amend the consolidated plan in the event of an emergency such as a natural disaster. These amendments may include funding new activities and/or the reprogramming of funds including canceling activities to meet community development needs that have a particular urgency. A substantial amendment does not include amendments to meet this National Objective of Urgent Need. Therefore, the CEDD may utilize CDBG or HOME funds to meet an urgent need without the normal public comment period, which is otherwise required for substantial amendments.

To comply with the national objective of meeting community development needs having a particular urgency, an activity will alleviate existing conditions that the City of Rockford certifies:

CITY OF ROCKFORD
COMMUNITY PLANNING AND DEVELOPMENT PROGRAMS
CITIZEN PARTICIPATION PLAN

- Pose a serious and immediate threat to the health and welfare of the community
- Are of recent origin or recently became urgent
- The City is unable to finance the activity on its own
- Other resources of funding are not available to carry out the activity

A condition will generally be considered to be of recent origin if it is developed or became critical within 18 months preceding the City's certification.

Amendments under Public Health Recommendations or Major Disaster Declaration:

See Abbreviated Plan below.

Publishing & Notices

A notice of availability of the proposed document for public review and comment will be published in 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

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

intends to comply with the intent and spirit of the Americans with Disabilities Act. If a sign language interpreter, personal P.A. system or other special accommodations are needed, CEDD, will be prepared to assist if notified 48 hours in advance. Additionally, CEDD will provide interpreters when it is evident that a significant number of non-English speaking persons will be present.

Although not required, a third public hearing may be conducted to receive feedback regarding performance reports and/or special projects.

Public Hearings under Public Health Recommendations or Major Disaster Declaration:

See Abbreviated Plan below.

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

An abbreviated plan may be utilized under the following circumstances:

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

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

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

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

**Community Planning and Development Program
Complaint Process**

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

Neighborhood & Housing Programs

Sarah Brinkmann – Housing & Program Manager

Sarah.Brinkmann@rockfordil.gov

779-348-7162

Economic Development Programs

Karl Franzen – Director of the Community & Economic Development Dept.

karl.franzen@rockfordil.gov

779-348-7162

ESG & Homeless Programs

Jennifer Jaeger – Community Services Director

Jennifer.Jaeger@rockfordil.gov

779-348-7565

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

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

Karl Franzen – Director of the Community & Economic Development Dept.

karl.franzen@rockfordil.gov

779-348-7162

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

Anqunette.Parham@rockfordil.gov

779-348-7170

Step 4: A record of each complaint received by the City will be maintained. Included within the record will be:

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

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Rockford Register Star

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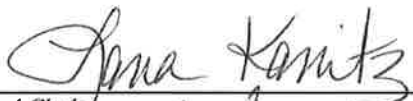
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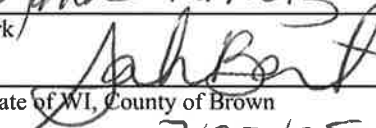
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SARAH BERTELSEN
Notary Public
State of Wisconsin

4/24/2022

**NOTICE OF PUBLIC
HEARING & DISPLAY OF
THE CITY OF ROCK-
FORD'S SUBSTANTIAL
AMENDMENT TO THE
2020-2024 CONSOLIDATED
PLAN AND 2022 ANNUAL
ACTION PLAN**

FOR PUBLIC COMMENT

Notice is hereby given that the City of Rockford (City) will hold a recorded virtual public hearing to summarize a draft of the City's Substantial Amendment to the 2020-2024 Consolidated Plan and 2022 Annual Action Plan, which will also be on display for public comment. The recorded public hearing will be made available for review and comment on or before Monday 4/25/2022, on the City's website at www.rockfordil.gov.

The amendment addresses program income (PI) and the disposition of four properties related to the Neighborhood Stabilization Program (NSP1) funding. The NSP1 grant PI will become Community Development Block Grant PI and the disposition of the properties will be carried out according to CDBG regulations. This amendment will be submitted to HUD immediately after comments have been considered.

The Substantial Amendment draft will be made available on Monday, April 25, 2022. It will remain available for public display and comment through Wednesday, 5/25/2022 at 5 PM. 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 Substantial Amendment draft. Comments will be taken into consideration when finalizing the amendment. Written comments may be addressed to Sarah Brinkmann, Housing and Program Manager, Dept. of Community and Economic Development, 425 East State St, Rockford, IL 61104 or emailed to sarah.brinkmann@rockfordil.gov, 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.



CITY OF ROCKFORD

2020-2024 CONSOLIDATED PLAN

2022 ANNUAL ACTION PLAN

AMENDMENT



Consolidated Plan Amendment

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Address by Vice President at the Community Reception in...

Ministry of External Affairs, India

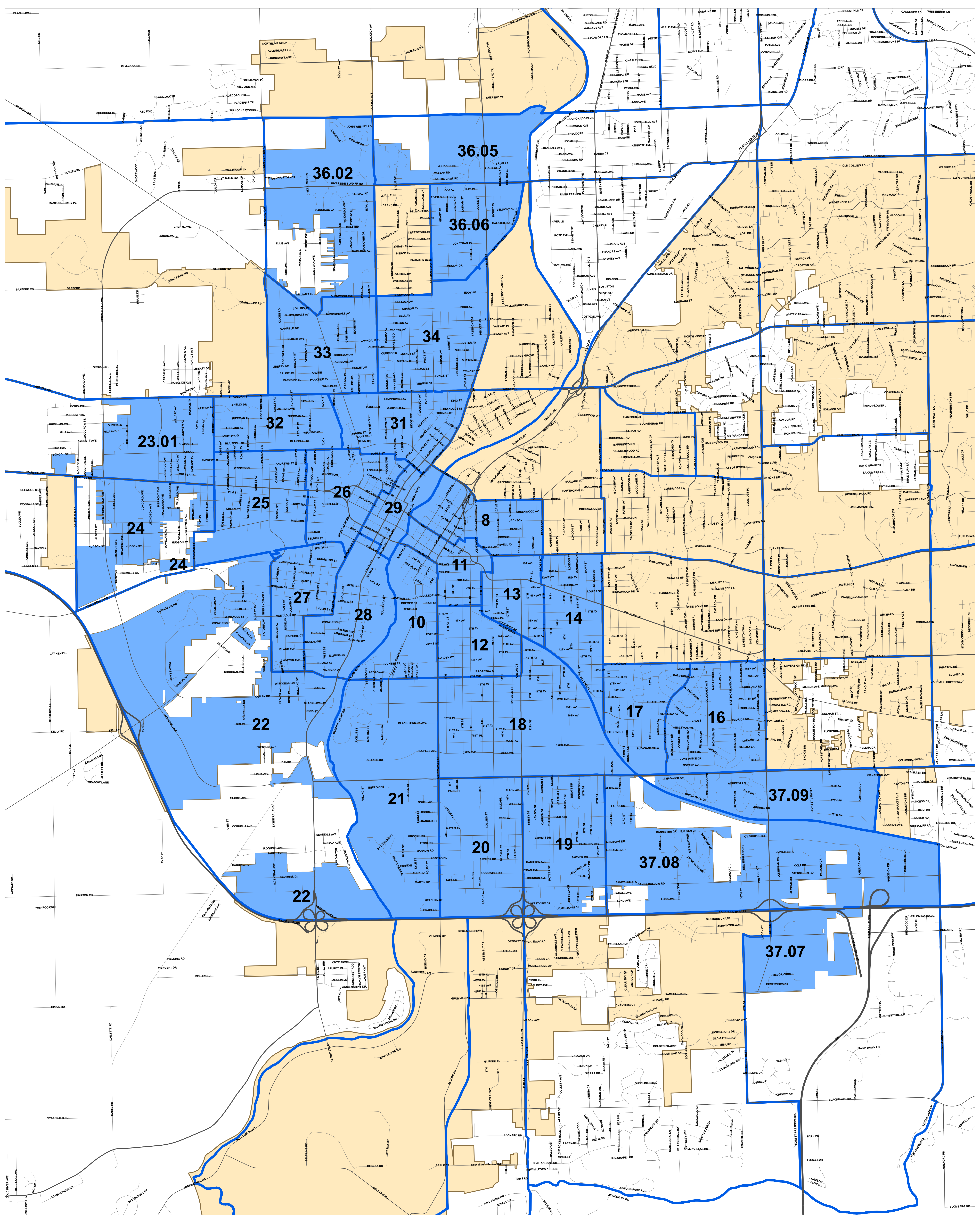
Address by Vice President at the Community Reception in...

Ministry of External Affairs, India

City of Rockford
2022 Annual Action Plan
Grantee Unique Appendices

- **Maps**
- **Resale/Recapture Policy**
- **Budget amendment/allocation notification**

City of Rockford
2022 Annual Action Plan
Maps

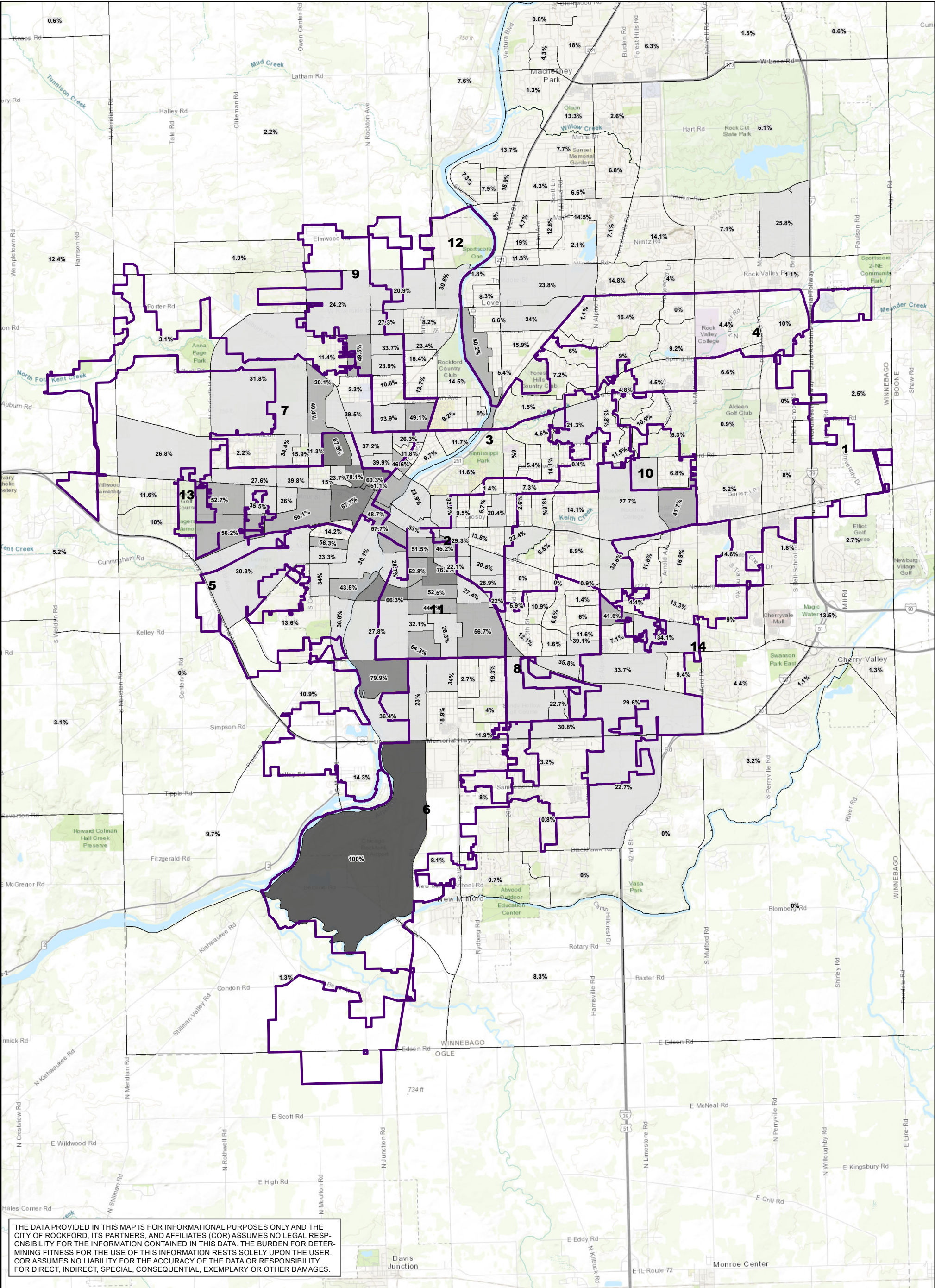


2022 CDBG Area Low-to-Moderate Income Level by Census Tract

- Low-to-Moderate Income
- Rockford Municipal Boundary

0 0.5 1 2 Miles

Map Produced by: City of Rockford on 6/8/2022



Percent of Population Below Poverty Status

2019 Census ACS 5-year Estimates

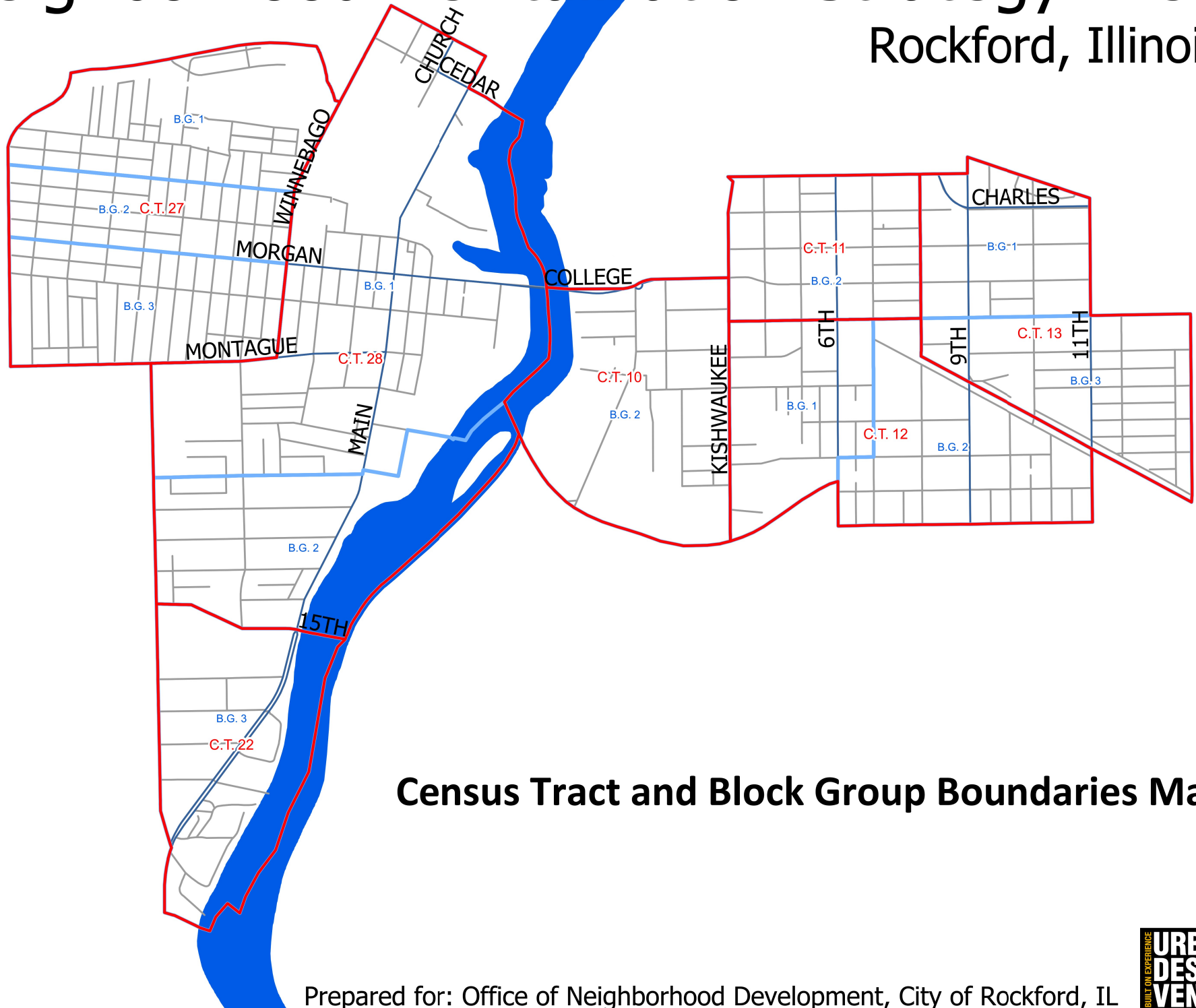


Map Produced: April 2022



Neighborhood Revitalization Strategy Area

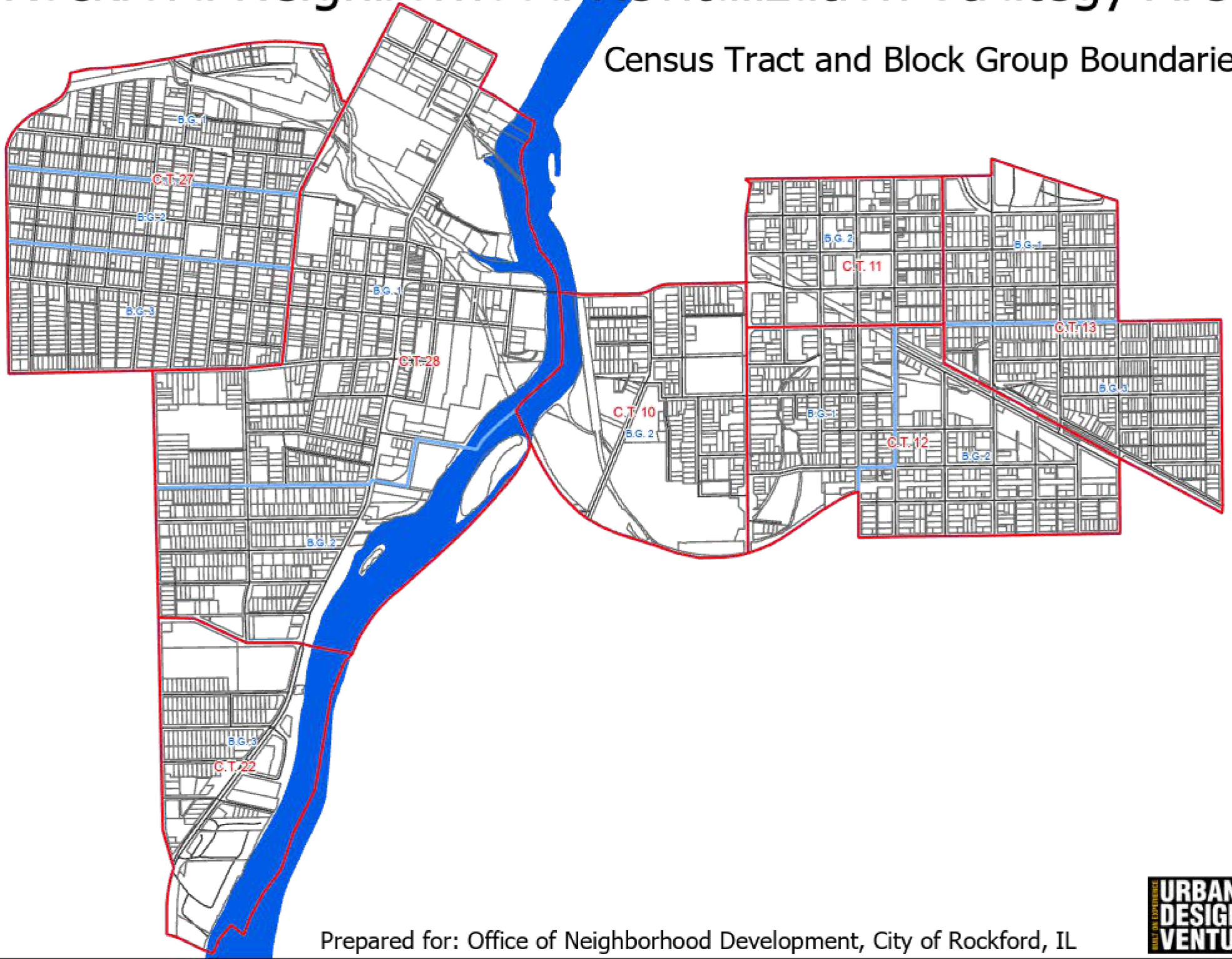
Rockford, Illinois



Census Tract and Block Group Boundaries Map

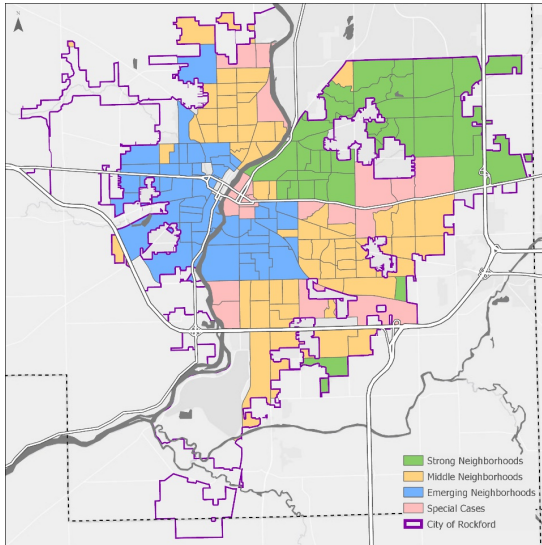
Rockford Neighborhood Revitalization Strategy Area

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

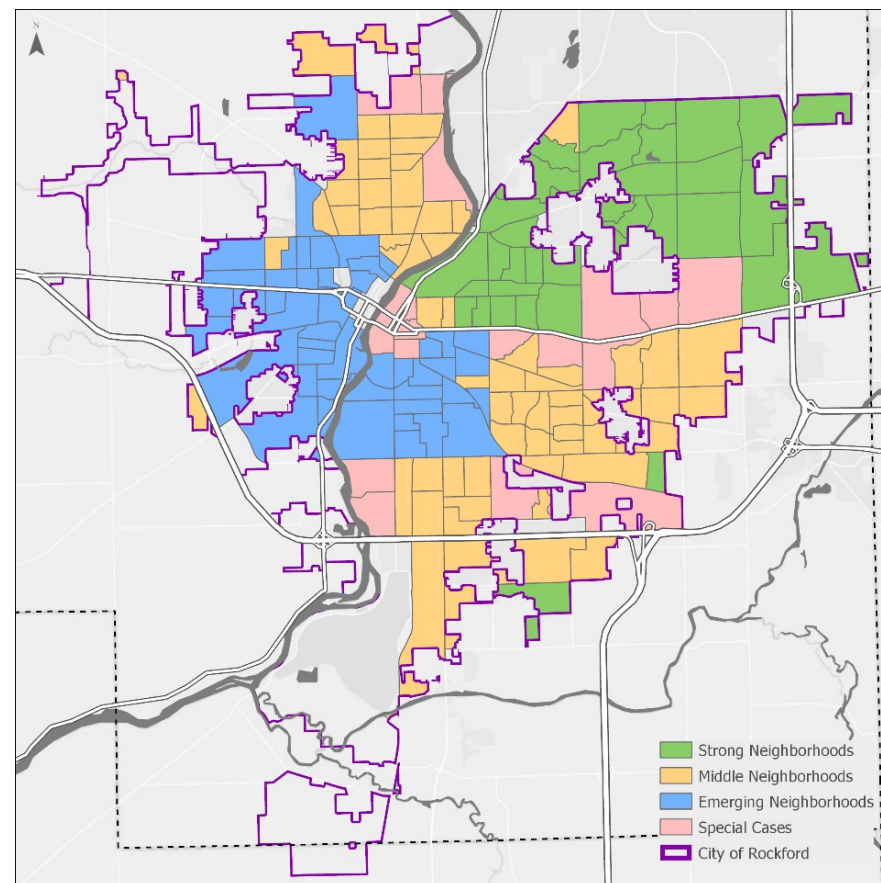
- Heighten neighborliness, community connection and civic participation
- Increase neighborhood safety – both real and perceived
- Ensure access to neighborhood amenities and connections to broader city programs and events
- Foster neighborhood pride

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
2022 Annual Action Plan
Resale/Recapture Policy

City of Rockford Resale/Recapture Policy

Description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254 is as follows:

The City intends to provide HOME funds to low income homebuyers planning to occupy units as their primary residence. The homebuyer programs will follow the recapture guidelines. However, the City will follow the Resale guidelines if City provides *developer subsidy* and does not provide *direct HOME subsidy*, as defined below. The City will enforce deed restrictions, homebuyer agreements, and/or covenants recorded at the Winnebago County Recorder's Office. The City ensures compliance with the residency requirement as mortgagee on the homeowner's insurance policy – receiving notice upon ownership changes. Homebuyers found non-compliant for occupying the unit as their primary residence will repay the entire HOME investment (developer subsidy plus direct HOME subsidy) to the Department of Housing and Urban Development.

Definitions: The definition of *italicized* words throughout the document are below.

Developer subsidy - The difference between the cost of producing the affordable unit and the fair market value of the unit.

Direct HOME subsidy - The amount of HOME funds that enabled the *low-income* homebuyer to purchase a unit. This includes down payment, closing costs, interest subsidies, HOME funds provided directly to the homebuyer, and/or HOME funds that reduced the purchase price from fair market value to an affordable price. When developing a unit using HOME funds, if a unit sells below fair market value, the difference between the fair market value and the purchase price is also *direct HOME subsidy*.

Fair return - The City calculates a fair return by multiplying the percentage change in the Consumer Price Index (CPI) over the period of ownership by the amount of the homebuyer's initial investment plus any homebuyer capital improvements since time of purchase.

Step 1

$A - B = C$

A = CPI % at time of sale to subsequent homebuyer
B = CPI % at time of initial purchase
C = % CPI change

Step 2

$(A + B) \times C = D$

A = Homebuyer Initial Investment
B = Homebuyer Capital Improvements
C = % CPI change
D = Fair Return

Homebuyer capital improvements – This includes the amount originally spent for improvements to the unit that add value or substantially prolongs the life of the unit. Examples may include, but are not limited to, room additions, roof and/or window replacement, electrical and/or plumbing upgrades, accessibility modifications, bathroom and/or kitchen remodel, and outdoor improvements such as a new drive way, side walk, retaining wall or fence. Examples do not include replacing worn or dated components such as appliances or carpet. Homebuyers must provide proof of amount originally spent; i.e. paid receipts/invoices.

City of Rockford Resale/Recapture Policy

Homebuyer initial investment – This includes any homebuyer contributions at time of initial purchase. Examples may include but are not limited to, down payment, closing costs, and earnest money.

Low-Income – 80% of the area median income as determined annually by the Department of Housing and Urban Development.

Net proceeds – are the sales price minus *superior loan* repayment (other than HOME funds) and any closing costs.

Period of affordability – is the length of time a *low-income* homebuyer must occupy the unit as their primary residence.

Period of Affordability	
Total HOME funds provided to the homebuyer	Minimum Period of Affordability
Under \$15,000	5 years
Between \$15,000 and \$40,000	10 years
Over \$40,000	15 years

Affordability restrictions (recapture or resale) will be revived according to the original terms if, during the original period of affordability, the initial homebuyer has a terminating event and regains ownership interest in the unit.

Superior loan – The recording of the initial mortgage loans at the time of purchase will be in the order in which repayment is required should a transfer of ownership occur voluntarily or involuntarily. All mortgages recorded in front of the HOME funds are superior loans.

Recapture Guidelines:

For recapture, the total *direct HOME subsidy* determines the length of time the *period of affordability* lasts. Since the *direct HOME subsidy* is subject to recapture throughout the *period of affordability*, the homebuyer will sign an assistance agreement, a promissory note, and a mortgage. Recorded at the Winnebago County Recorder's office is the assistance agreement and mortgage.

If transfer of ownership occurs to any willing homebuyer during the *period of affordability* either voluntarily or involuntarily, the initial homebuyer is required to repay the remaining principal loan balance after a pro rata reduction over time calculation. However, the City will never recapture more than the available *net proceeds*. When the *net proceeds* are zero, there is no recapture of *direct HOME subsidy*.

Homebuyers found non-compliant of the recapture requirements will repay the entire HOME investment (developer subsidy plus direct HOME subsidy) to the Department of Housing and Urban Development.

Subsequent Homebuyer:

The City may allow a subsequent *low-income* homebuyer assume the HOME requirements if no additional HOME funds are provided.

City of Rockford Resale/Recapture Policy

Lease Purchase:

Under a lease purchase agreement, if the unit fails to transfer to the homebuyer within forty-two months after project completion, the City will ensure the HOME affordability requirements for rental housing apply.

Preserving Affordability:

If necessary to preserve the affordability of the unit, the City may use additional HOME funds to acquire through a purchase option, right of first refusal, or other preemptive right before foreclosure, or to acquire the housing at the foreclosure sale, to undertake any necessary rehabilitation, and to assist a subsequent homebuyer. When this occurs, unless the City chooses to treat the expense as an administration cost, the original HOME funds and the additional HOME funds will not exceed the maximum per unit subsidy amount under 24 CFR Part 92.250. Considered will be the reimbursement of administrative funds used, in whole or in part, when the housing sells to the subsequent homebuyer.

Resale Guidelines:

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

When transfer of ownership to a qualifying subsequent homebuyer occurs, voluntary or involuntary during the *period of affordability*, the initial homebuyer may receive, when *net proceeds* allow, the sum of their *initial investment*, *capital improvements*, and *fair return*. The City will not receive more than the total HOME investment. Therefore, when appreciation of the unit exceeds the amount of HOME funds invested, the City will only collect an amount equal to the HOME investment.

Besides allowing the initial homebuyer to receive a fair return on their investment, the City must ensure the unit is affordable to a reasonable range of *low-income* homebuyers interested in fulfilling the resale requirements for the remaining *period of affordability*. Affordable to a reasonable range of *low-income* homebuyers is defined as homebuyers with household income between sixty percent (60%) and eighty percent (80%) of the area median income paying between twenty-five percent (25%) and thirty percent (30%) of their gross monthly income for principal, interest, property taxes, and insurance. Exceptions to the 25%-30% range maybe made when 1) homebuyers use State or Federal funded first mortgage lending products or 2) when the result significantly reduces the homebuyer's cost burden. The current fair market value will determine the sale price and not what is affordable to the subsequent homebuyer. To ensure affordability for the subsequent *low-income* homebuyer, the City may provide additional HOME funds.

Homebuyers found non-compliant of the resale requirements will repay the entire HOME investment (*developer subsidy* plus *direct HOME subsidy*) to the Department of Housing and Urban Development.

City of Rockford
2022 Annual Action Plan
Budget amendment/allocation notification

City of Rockford 2022 Annual Action Plan

ADDITIONAL LOCAL POLICY AND PROGRAMMING DETAILS

2022 Budget

The 2022 estimated budget is based on the City's 2021 federal entitlement grant allocation of \$3,417,306.

2022 Budget	CDBG	HOME	ESG	TOTAL
Housing Development	\$0	\$197,500	\$0	\$197,500
Housing Rehabilitation	\$611,059	\$615,129	\$0	\$1,226,188
Homeownership	\$0	\$76,635	\$0	\$76,635
Fair Housing	\$10,000	\$0	\$0	\$10,000
Project Delivery	\$429,018	\$0	\$0	\$429,018
Infrastructure	\$250,000	\$0	\$0	\$250,000
Clearance/Demolition	\$300,000	\$0	\$0	\$300,000
ED Development	\$271,712	\$0	\$0	\$271,712
Homeless Housing	\$0	\$0	\$50,000	\$50,000
Homeless Operation/Support	\$0	\$0	\$50,000	\$50,000
Homeless Prevention and Re-Housing	\$0	\$0	\$75,961	\$75,961
Administration, Planning, Management Strategy	\$372,794	\$98,237	\$9,261	\$480,292
TOTAL 2022 budget	\$2,244,583	\$987,501	\$185,222	\$3,417,306
2021 grant allocation	\$2,244,583	\$987,501	\$185,222	\$3,417,306
Anticipated program income	\$8,000	\$15,456	n/a	

Adjustments will be made to the 2022 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 2022 funds.

CHDO

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 of Rockford
2022 Annual Action Plan
Grantee SF-424's and Certifications

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

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

*** Other (Specify):**

*** 3. Date Received:**

8-5-2022

4. Applicant Identifier:

5a. Federal Entity Identifier:

36-6006082

5b. Federal Award Identifier:

B22-MC-17-0020

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

City of Rockford

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

36-6006082

*** c. UEI:**

MPDSB2MNMM19

d. Address:

*** Street1:**

425 E State St

Street2:

*** City:**

Rockford

County/Parish:

*** State:**

IL: Illinois

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

61104-1014

e. Organizational Unit:

Department Name:

Community & Economic Develop

Division Name:

Neighborhood Development

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

Prefix:

Ms.

*** First Name:**

Sarah

Middle Name:

*** Last Name:**

Brinkmann

Suffix:

Title:

Housing and Program Manager

Organizational Affiliation:

*** Telephone Number:**

779-348-7442

Fax Number:

*** Email:**

Sarah.Brinkmann@RockfordIL.gov

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

Community Development Block Grant (CDBG)/ Entitlement Grants

* 12. Funding Opportunity Number:

n/a

* Title:

n/a

13. Competition Identification Number:

n/a

Title:

n/a

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

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

The fiscal year 2022 Annual Action Plan for the Community Development Block Grant (CDBG)/ Entitlement Grants

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

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

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

Add Attachment

Delete Attachment

View Attachment

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

* a. Federal	<input type="text" value="2,166,237.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="70,057.00"/>
* g. TOTAL	<input type="text" value="2,236,294.00"/>

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

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

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

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

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

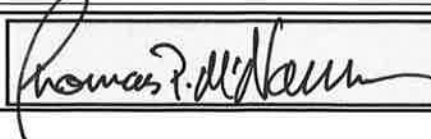
Middle Name:

* Last Name:

Suffix:

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

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

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.

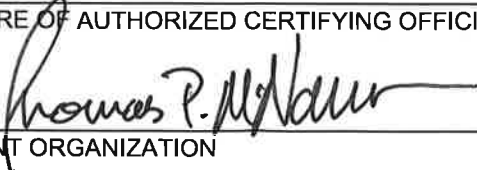
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

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 the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and 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 interest in the title of real property in accordance with 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 progress 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 for 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.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 		TITLE Mayor	
APPLICANT ORGANIZATION City of Rockford		DATE SUBMITTED 8-5-2022	

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:**

8-5-2022

4. Applicant Identifier:

5a. Federal Entity Identifier:

36-6006082

5b. Federal Award Identifier:

M22-MC-17-0208

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

City of Rockford

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

36-6006082

*** c. UEI:**

MPDSB2MNMM19

d. Address:

*** Street1:**

425 E State St

Street2:

*** City:**

Rockford

County/Parish:

*** State:**

IL: Illinois

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

61104-1014

e. Organizational Unit:

Department Name:

Community & Economic Develop

Division Name:

Neighborhood Development

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

Prefix:

MS.

*** First Name:**

Sarah

Middle Name:

*** Last Name:**

Brinkmann

Suffix:

Title:

Housing and Program Manager

Organizational Affiliation:

*** Telephone Number:**

779-348-7442

Fax Number:

*** Email:**

Sarah.Brinkmann@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 2022 Annual Action Plan for the HOME Investment Partnerships Program (HOME)

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

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

* a. Applicant 16th

* b. Program/Project 16th

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

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date: 01/01/2022

* b. End Date: 12/31/2022

18. Estimated Funding (\$):

* a. Federal	1,097,631.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	15,457.00
* g. TOTAL	1,113,088.00

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

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

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

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

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

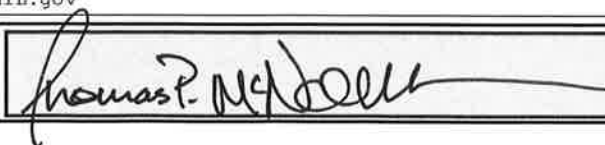
Suffix:

* Title: Mayor, City of Rockford

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

* Email: Thomas.McNamara@RockfordIL.gov

* Signature of Authorized Representative:



* Date Signed: 8-5-2022

ASSURANCES - CONSTRUCTION PROGRAMS

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 the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and 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 interest in the title of real property in accordance with 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 progress 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 for 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.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL

TITLE

Mayor

APPLICANT ORGANIZATION

City of Rockford

DATE SUBMITTED

8-5-2022

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:**

8-5-2022

4. Applicant Identifier:

5a. Federal Entity Identifier:

36-6006082

5b. Federal Award Identifier:

E22-MC-17-0020

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

City of Rockford

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

36-6006082

*** c. UEI:**

MPDSB2MNNM19

d. Address:

*** Street1:**

425 E State St

Street2:

*** City:**

Rockford

County/Parish:

*** State:**

IL: Illinois

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

61104-1014

e. Organizational Unit:

Department Name:

Community & Economic Develop

Division Name:

Neighborhood Development

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

Prefix:

Ms.

*** First Name:**

Sarah

Middle Name:

*** Last Name:**

Brinkmann

Suffix:

Title: Housing and Program Manager

Organizational Affiliation:

*** Telephone Number:**

779-348-7442

Fax Number:

*** Email:**

Sarah.Brinkmann@RockfordIL.gov

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.231

CFDA Title:

Emergency Solutions Grant Program

* 12. Funding Opportunity Number:

n/a

* Title:

n/a

13. Competition Identification Number:

n/a

Title:

n/a

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

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

The fiscal year 2022 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: 01/01/2022

* b. End Date: 12/31/2022

18. Estimated Funding (\$):

* a. Federal	188,681.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	188,681.00

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

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

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

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

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

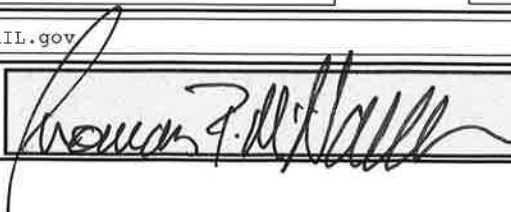
Suffix:

* Title: Mayor, City of Rockford

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

* Email: Thomas.McNamara@RockfordIL.gov

* Signature of Authorized Representative:



* Date Signed: 8-5-2022

CERTIFICATIONS

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

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

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

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

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

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

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

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


Signature of Authorized Official

7-13-2022
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.

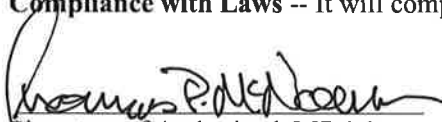
Excessive Force -- It has adopted and is enforcing:

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

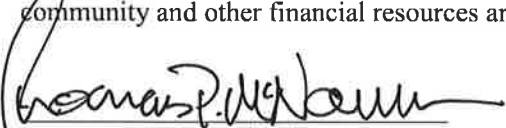
7-13-2022
Date

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

7-13-2022

Date

Mayor, City of Rockford

Title

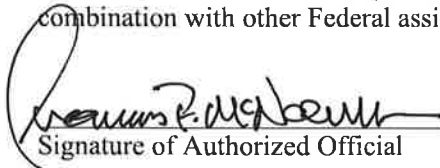
Specific HOME Certifications

The HOME participating jurisdiction certifies that:

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

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

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


Signature of Authorized Official

7-13-2022
Date

Mayor, City of Rockford

Title

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

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

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

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

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

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

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

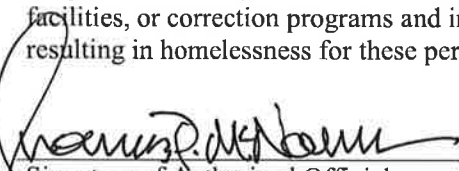
Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

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

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

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

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



Signature of Authorized Official

7-13-2022

Date

Mayor, City of Rockford

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

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