



CITY OF ROCKFORD

2025-2029

CONSOLIDATED PLAN



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Executive Summary

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

1. Introduction

The Consolidated Plan serves as a planning document meeting the federal government statutory requirements in 24 CFR 91.200-91.230. The City of Rockford, Illinois is an entitlement community under the U.S. Department of Housing & Urban Development's (HUD) Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG). In compliance with the HUD regulations, the City of Rockford has prepared this FY 2025-2029 Five Year Consolidated Plan (CP), FY 2025 Annual Action Plan (AAP), and FY 2025-2029 Analysis of Impediments to Fair Housing Choice (AI). The CP, AAP, and AI guide the City when administering the City's Federal Programs for housing, community, and economic development within the City of Rockford Illinois.

This CP, AAP, and AI establish the City's budget and strategies for the next five (5) years. The documents outline the specific goals and the implementation initiatives that the City will undertake to address its most recent housing needs by promoting and implementing the following initiatives: improving City infrastructure, the rehabilitation and construction of decent, safe, and sanitary housing; creating a suitable living environment; reinvesting in blighting properties; promoting fair housing; improving public services; and expanding economic opportunities, while putting the focus on benefitting low- and moderate-income persons.

This CP, AAP, and AI continue to be a concerted joint effort between the City of Rockford, the community at large, social service agencies, housing providers, community development agencies, economic development groups, and others. The process to update this required plan included hosting a series of public meetings, stakeholder interviews, resident surveys, statistical data and maps, and the integration of the City's 2040 Comprehensive Plan, City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032 , and other relevant planning documents as needed. This work early in the process helped to develop the goals and implementation strategies that are contained throughout this document.

The estimated funding levels are as follows:

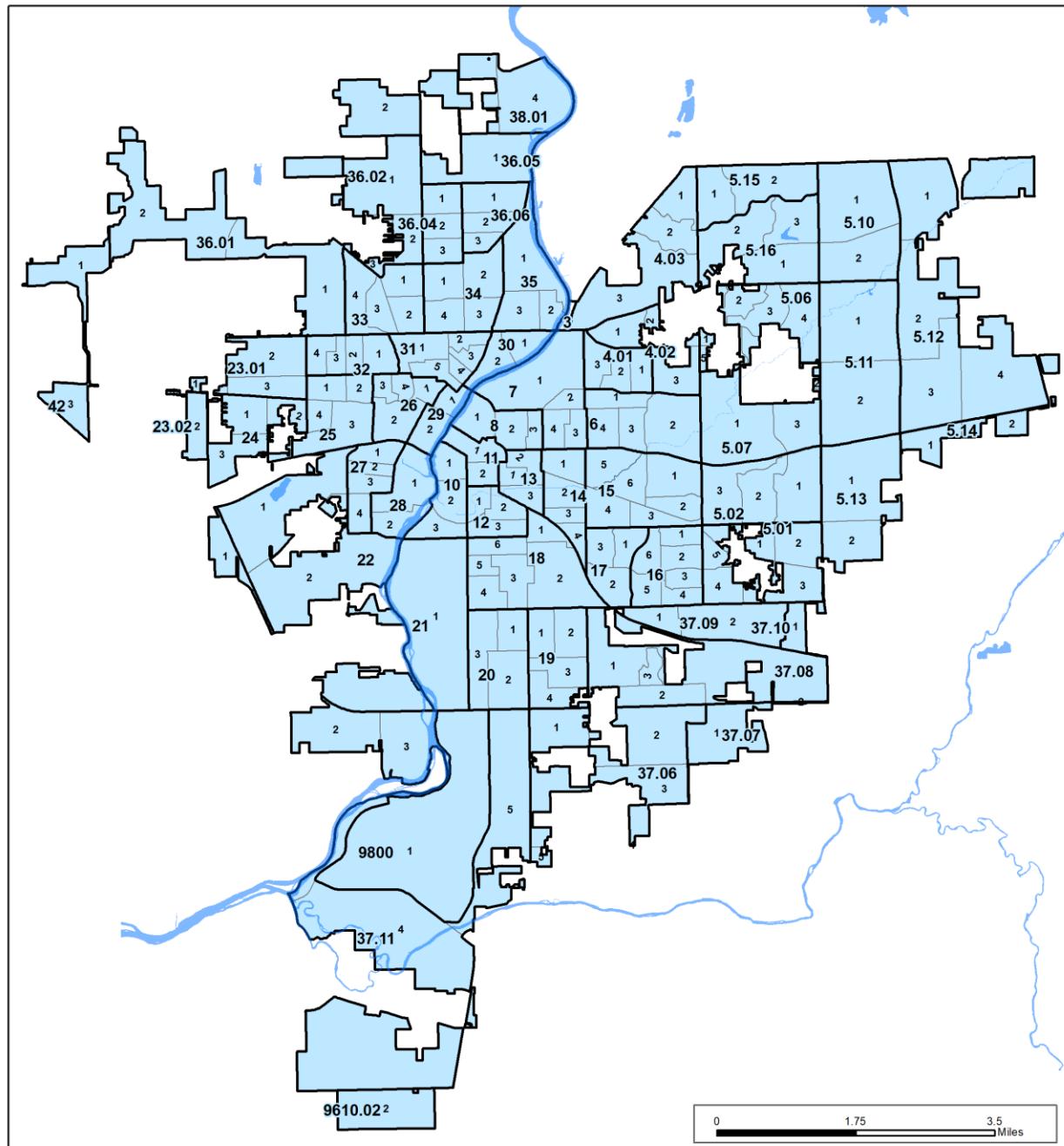
- Community Development Block Grant: \$2,219,358 (2025), \$11,096,790 (2025-2029)
- HOME Investment Partnerships Program: \$928,634.40 (2025), \$4,643,172 (2025-2029)
- Emergency Solutions Grant: \$192,497 (2025), \$962,485 (2025-2029)

2025 funding levels are based on 2024 funding levels and are contingent on the final approval of the Federal FY 2025 budget. The 2025-2059 budget assumes that City allocations will remain the same over the next five (5) years. See SP-35 and AP-15 "Anticipated Resources" for the City's contingency plan for adjusting the budget once HUD announces funding allocations.

Maps – Demographic and Housing Characteristics

The following maps highlight and illustrate some of the important demographic and housing characteristics of the City of Rockford that are significant to this Plan:

- City of Rockford Census Tracts and Block Groups, Page 3.
- Population Density by Census Tract, Page 4.
- Percent White Population by Census Tract, Page 5.
- Percent Minority Population by Census Tract, Page 6.
- Percent Population Age 65+ by Census Tract, Page 7.
- Percent Owner-Occupied Housing Units by Census Tract, Page 8.
- Percent Renter-Occupied Housing Units by Census Tract, Page 9.
- Vacant Household Location & Density by Census Tract, Page 10.
- Percent Low-Moderate Income by Census Block Group, Page 11.
- Percent Low-Moderate Income with over 50% Minority by Census Block Group, Page 12.
- Section 8 Housing Site Locations, Page 13.
- Scattered Public Housing Site Locations, Page 14.
- Major Public Housing Site Locations Page 15.
- 20 Percent of More of Population Below Poverty Page 16.
- 2024 CDBG Low-to Moderate Income (LMI) Page 17.



2020 Census Tracts & Block Groups

City of Rockford, Illinois



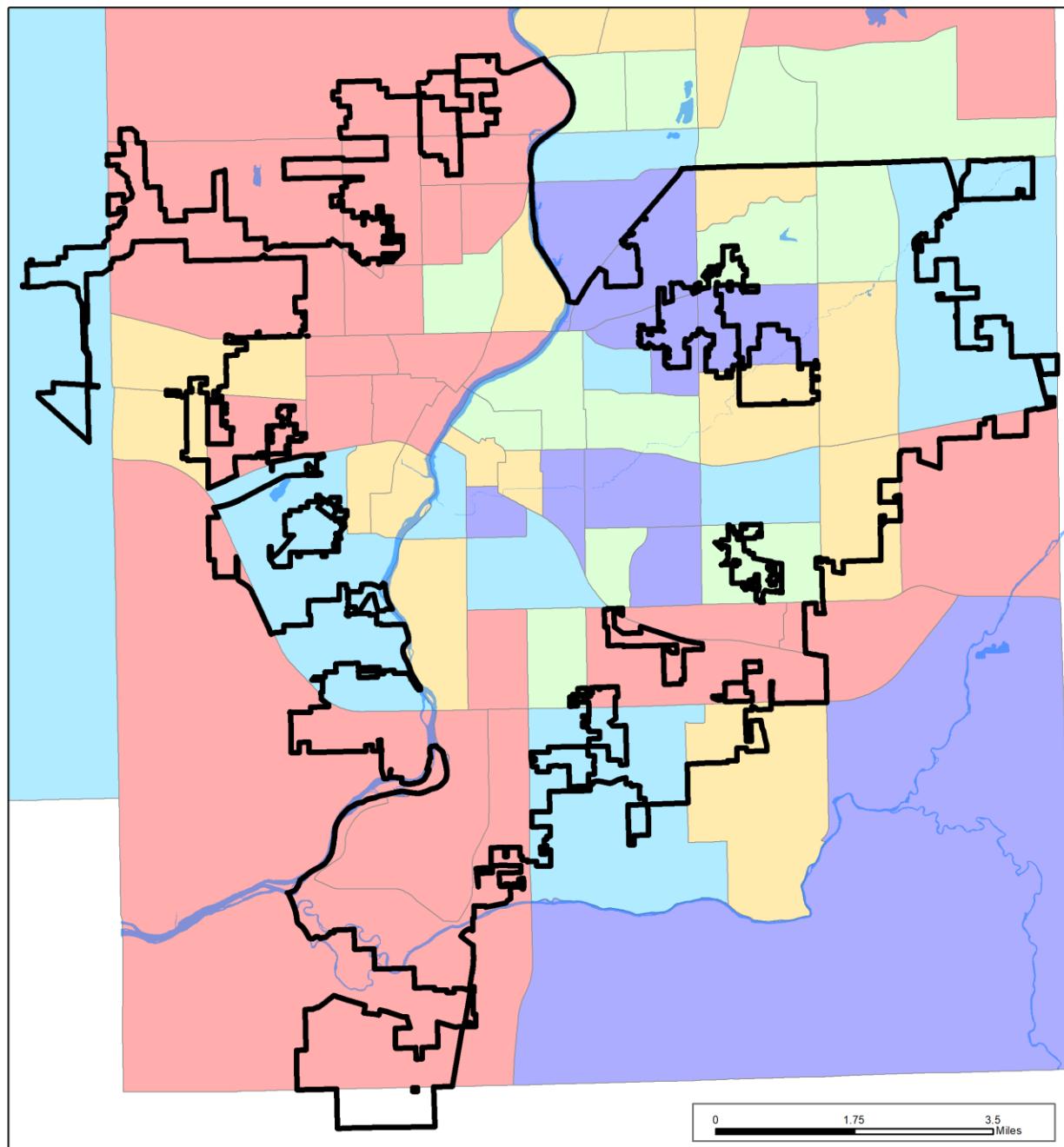
2020 Census Tract



2020 Census Block Group



Map Produced: November 2024



2020 Census Tracts City of Rockford, Illinois

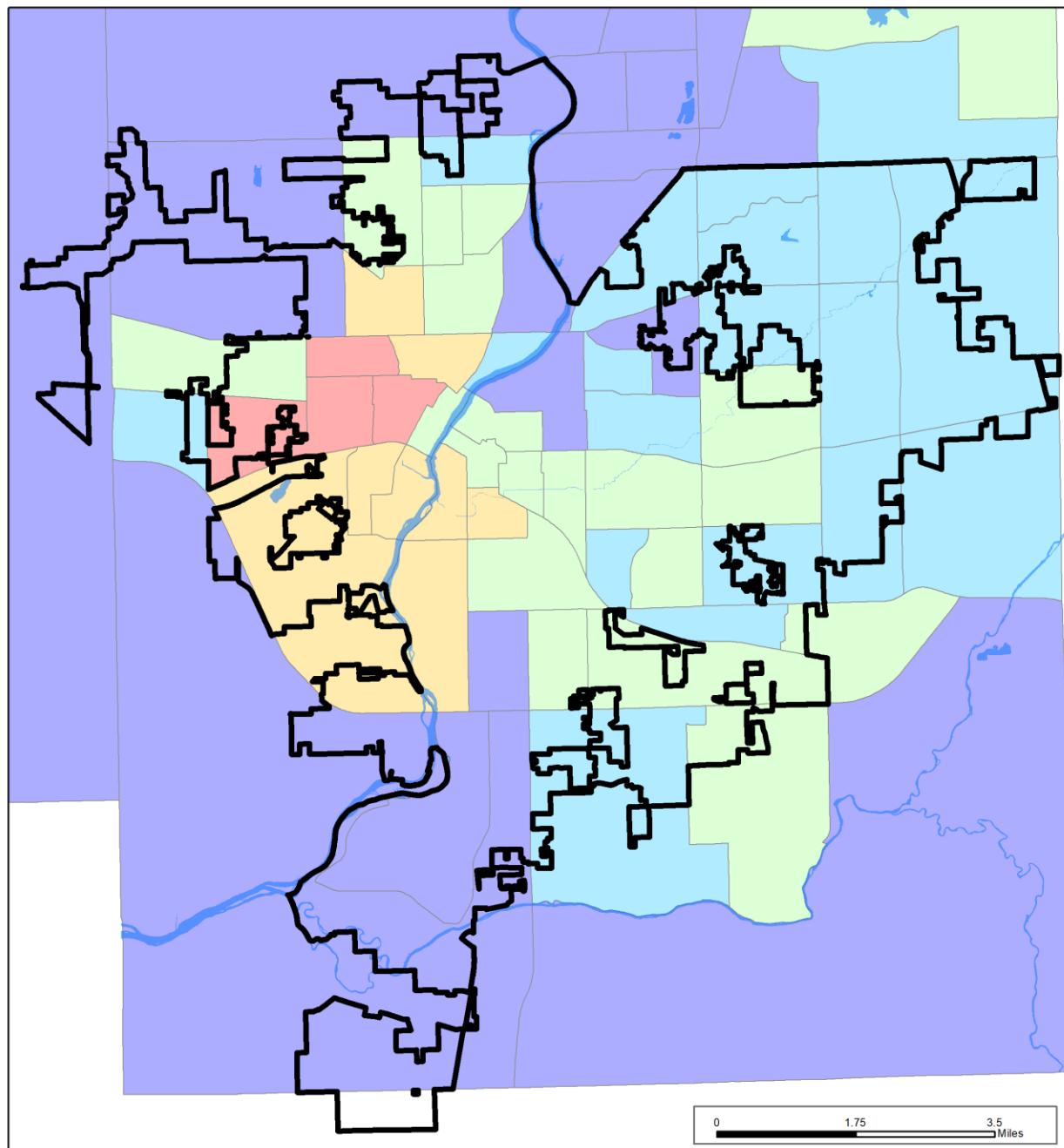
Showing Population Per Square Acre



- + 0.004 - 1.324
- + 1.325 - 4.096
- + 4.097 - 6.186
- + 6.187 - 10.847
- + 10.848 - 18.181

Map Produced: November 2024





2020 Census Tracts City of Rockford, Illinois

Showing Percent White Population per Acre



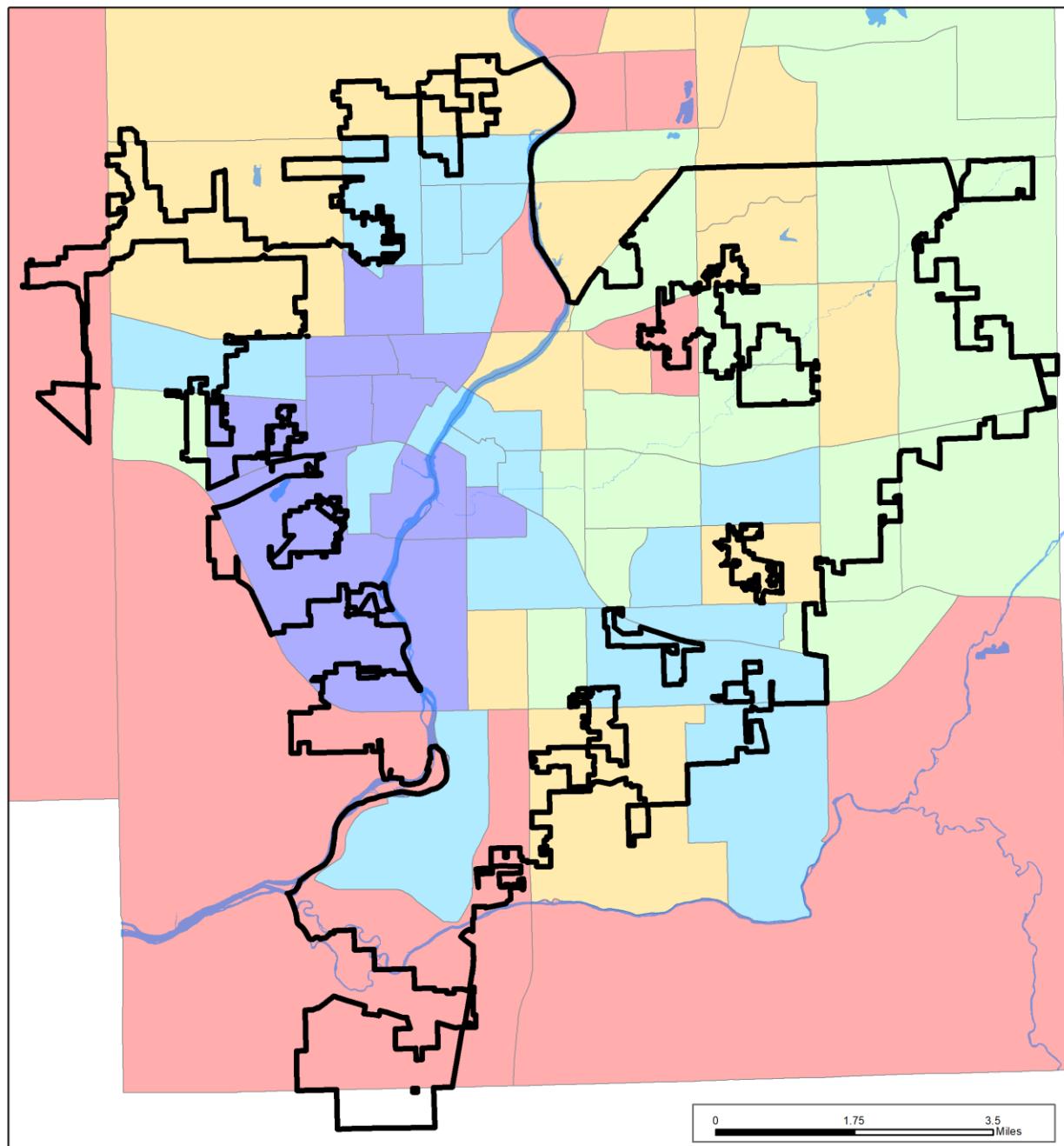
26% - 38% 59% - 77%

39% - 58% 78% - 89%

90% - 100%



Map Produced: November 2024



2020 Census Tracts City of Rockford, Illinois

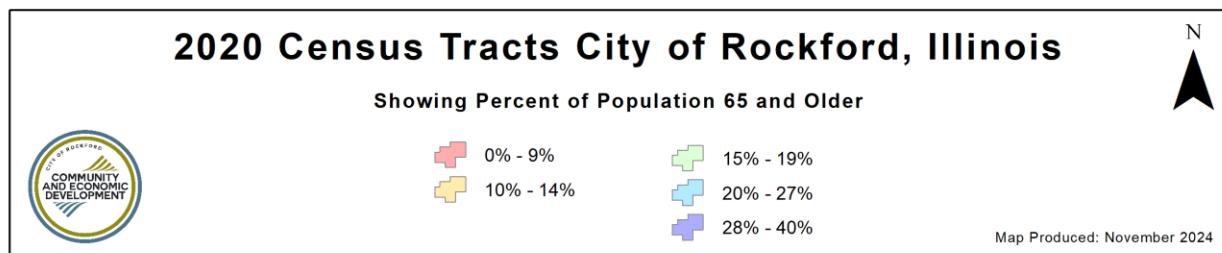
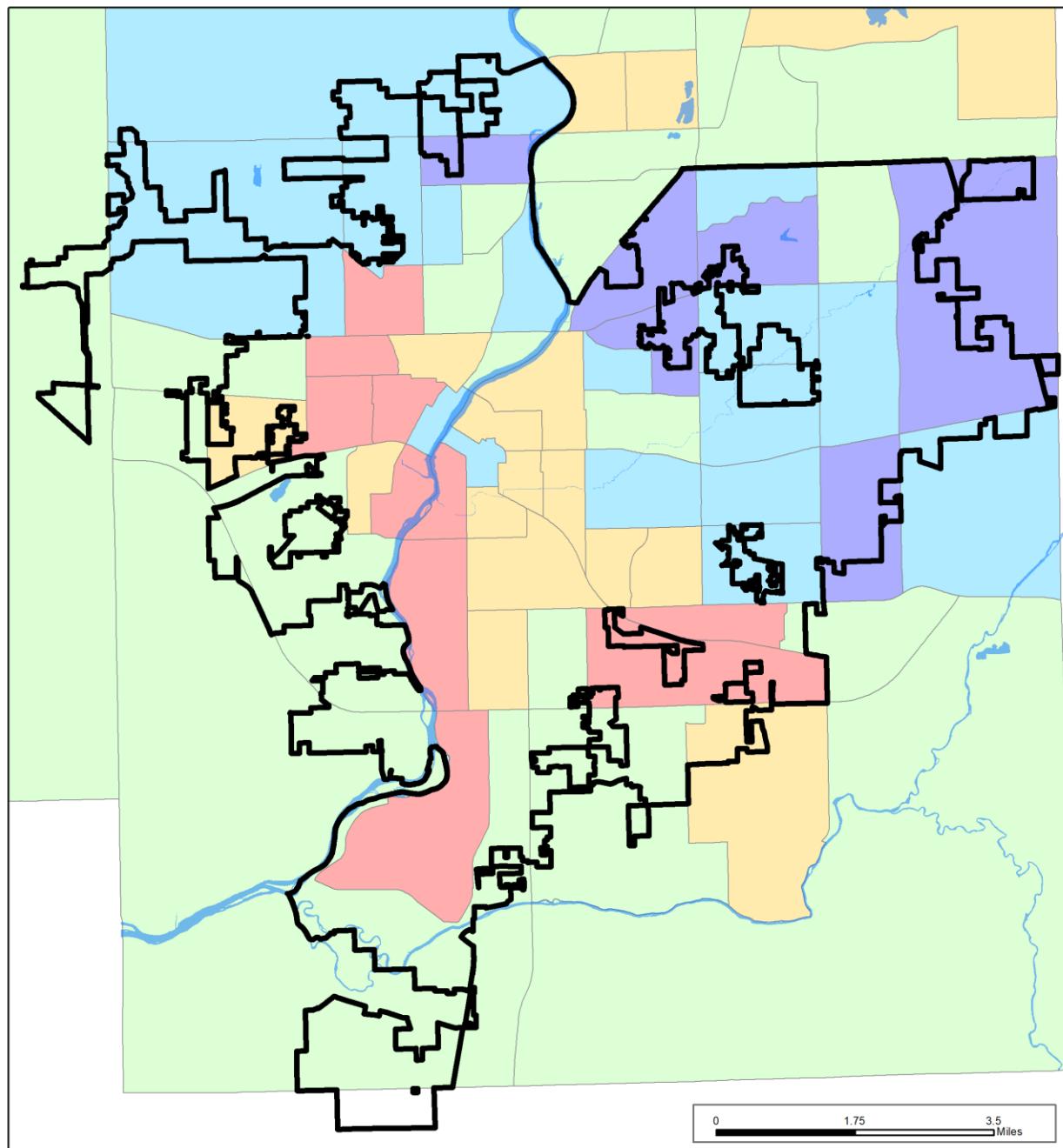
Showing Percent Minority

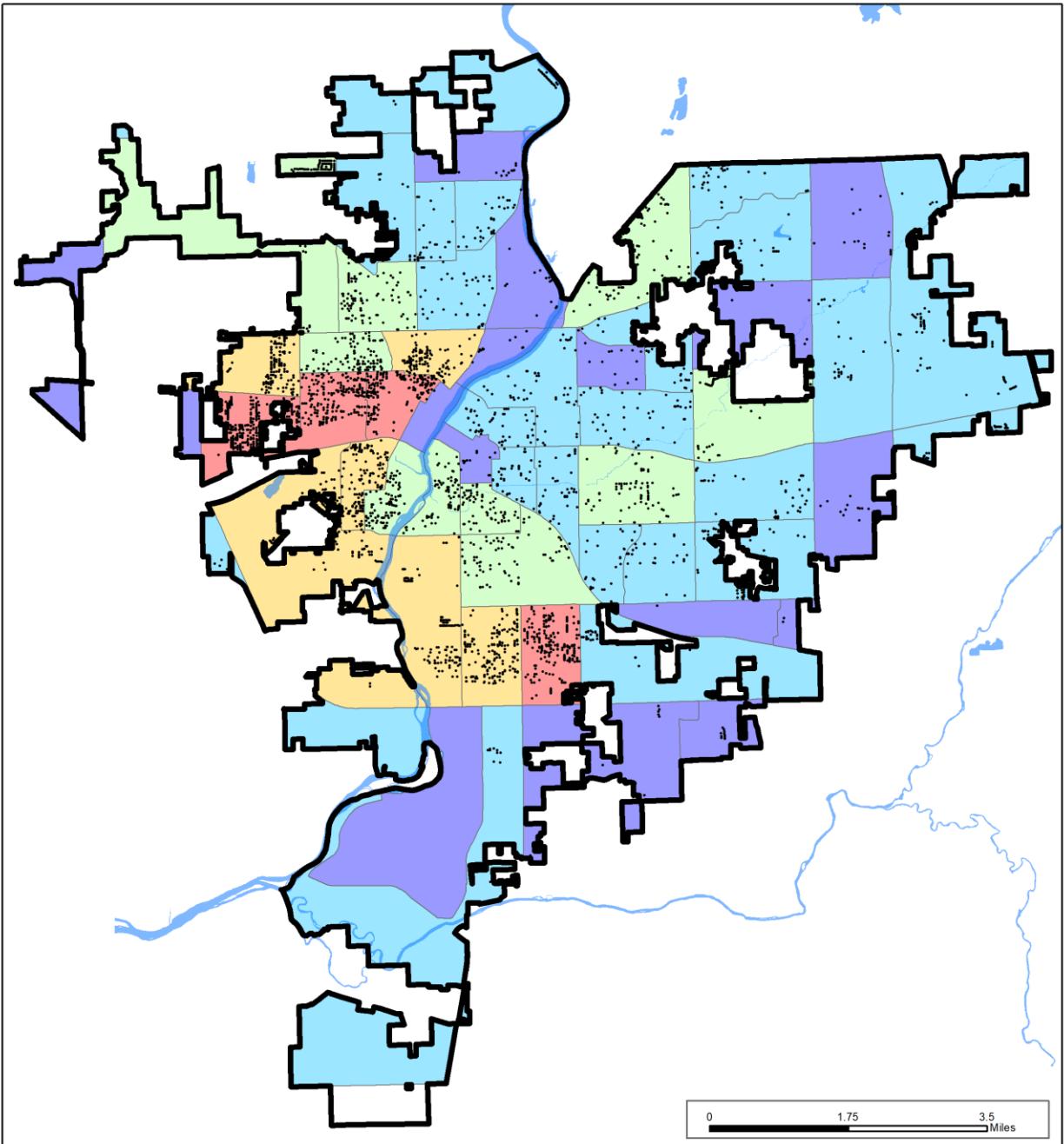


	0% - 9%
	10% - 17%
	18% - 29%
	30% - 50%
	51% - 84%

Map Produced: November 2024







2020 Census Tracts City of Rockford, Illinois

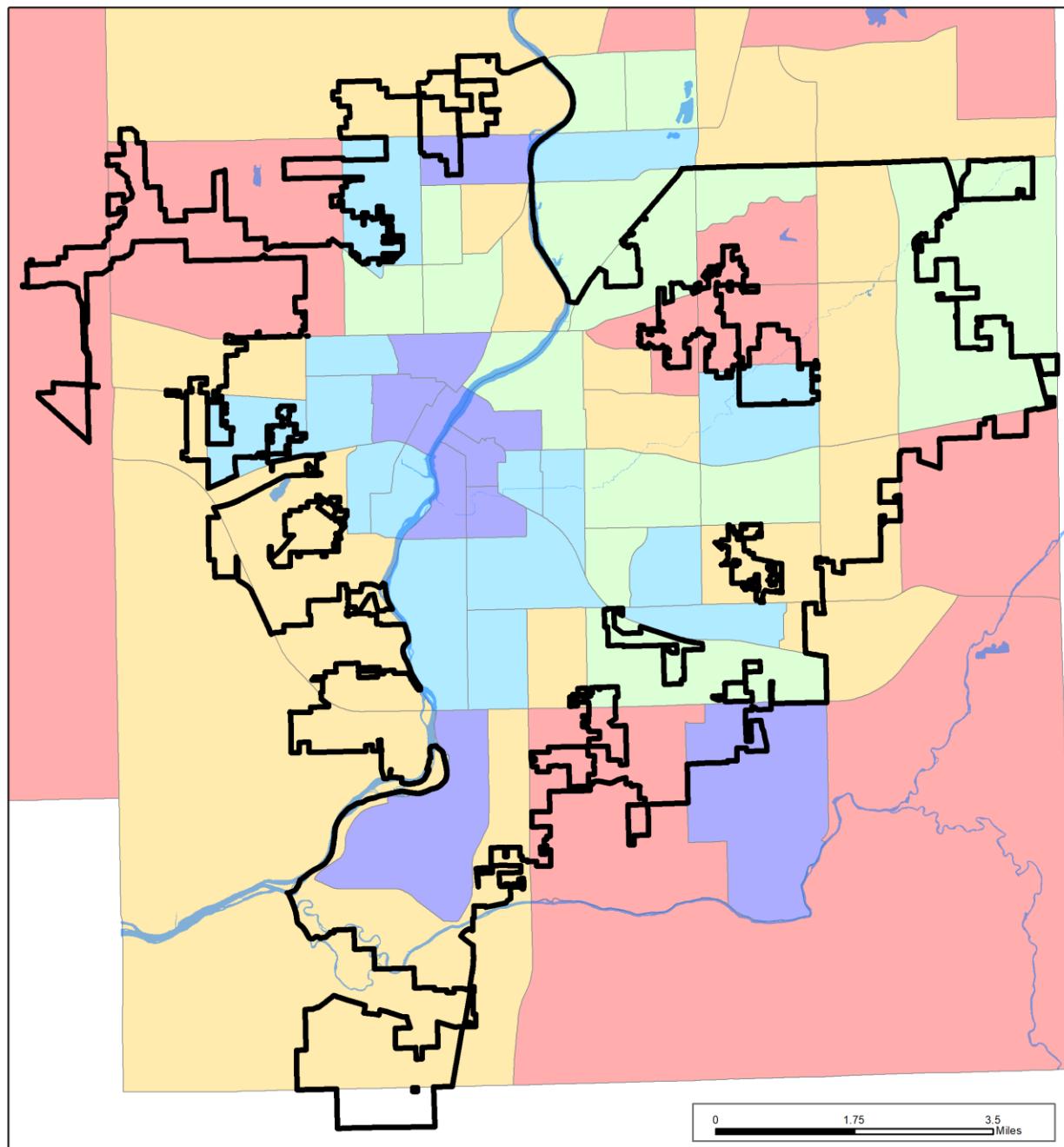
Showing Number of Vacant Households Within City Limits (ONLY)



	177 - 310
	105 - 176
	53 - 104
	16 - 52
	0 - 15



Map Produced: November 2024



2020 Census Tracts City of Rockford, Illinois

Showing Percent of Renter Occupied Housing Units



0% - 29%

30% - 51%

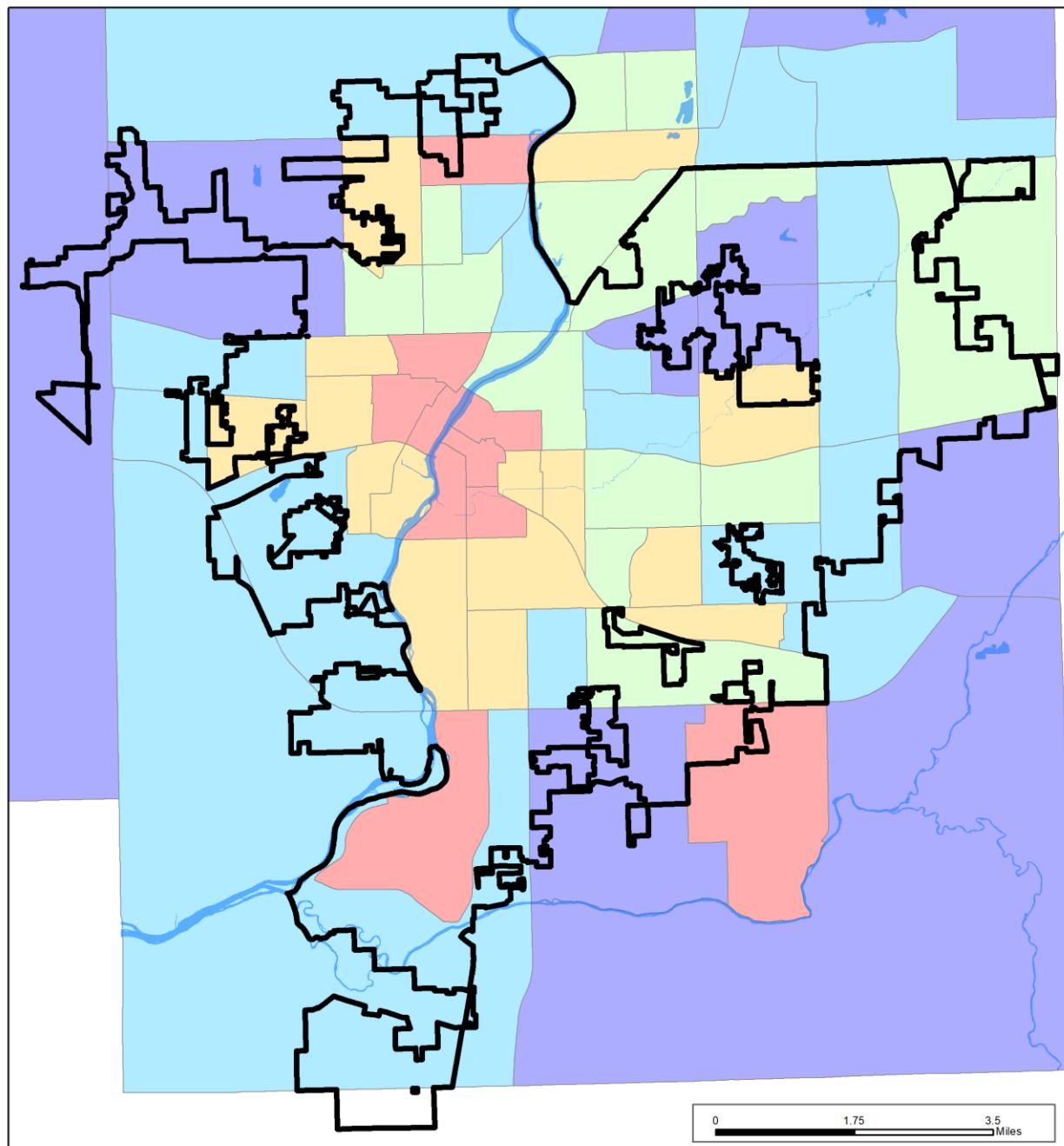
52% - 66%

67% - 81%

82% - 97%

Map Produced: November 2024





2020 Census Tracts City of Rockford, Illinois

Showing Percent of Owner Occupied Housing Units



0% - 29%

30% - 51%

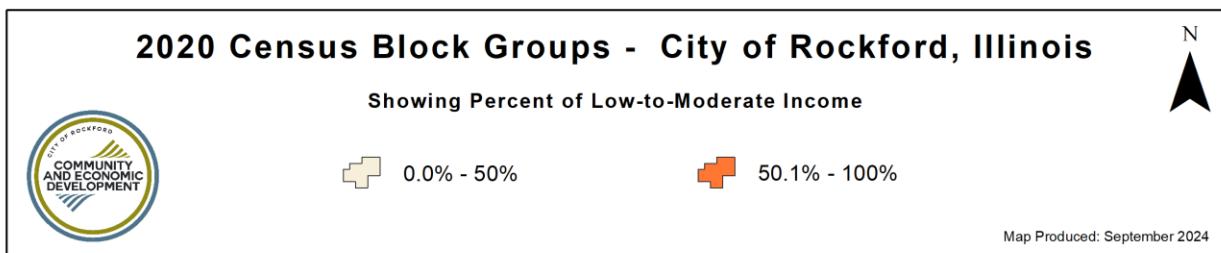
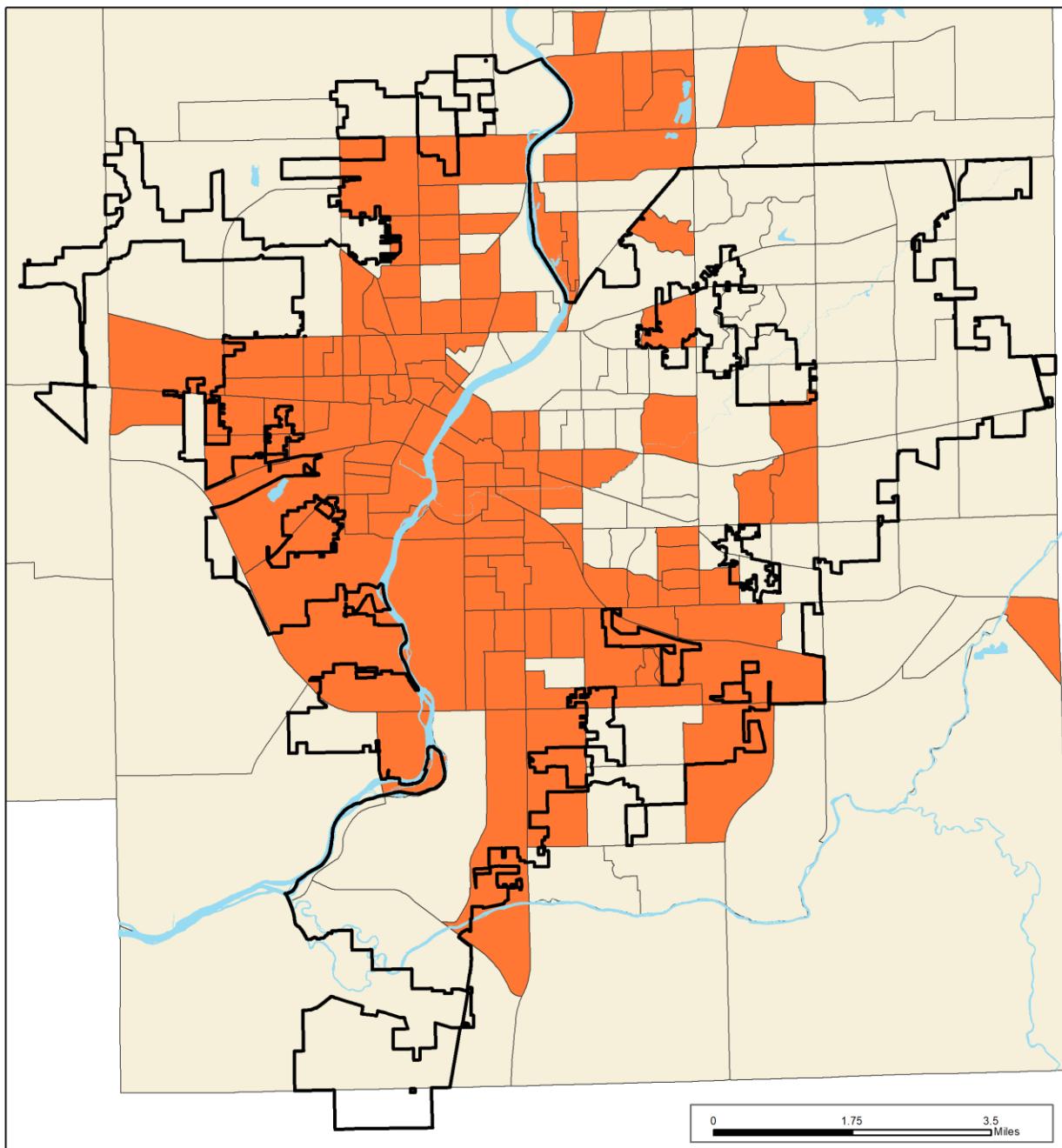
52% - 66%

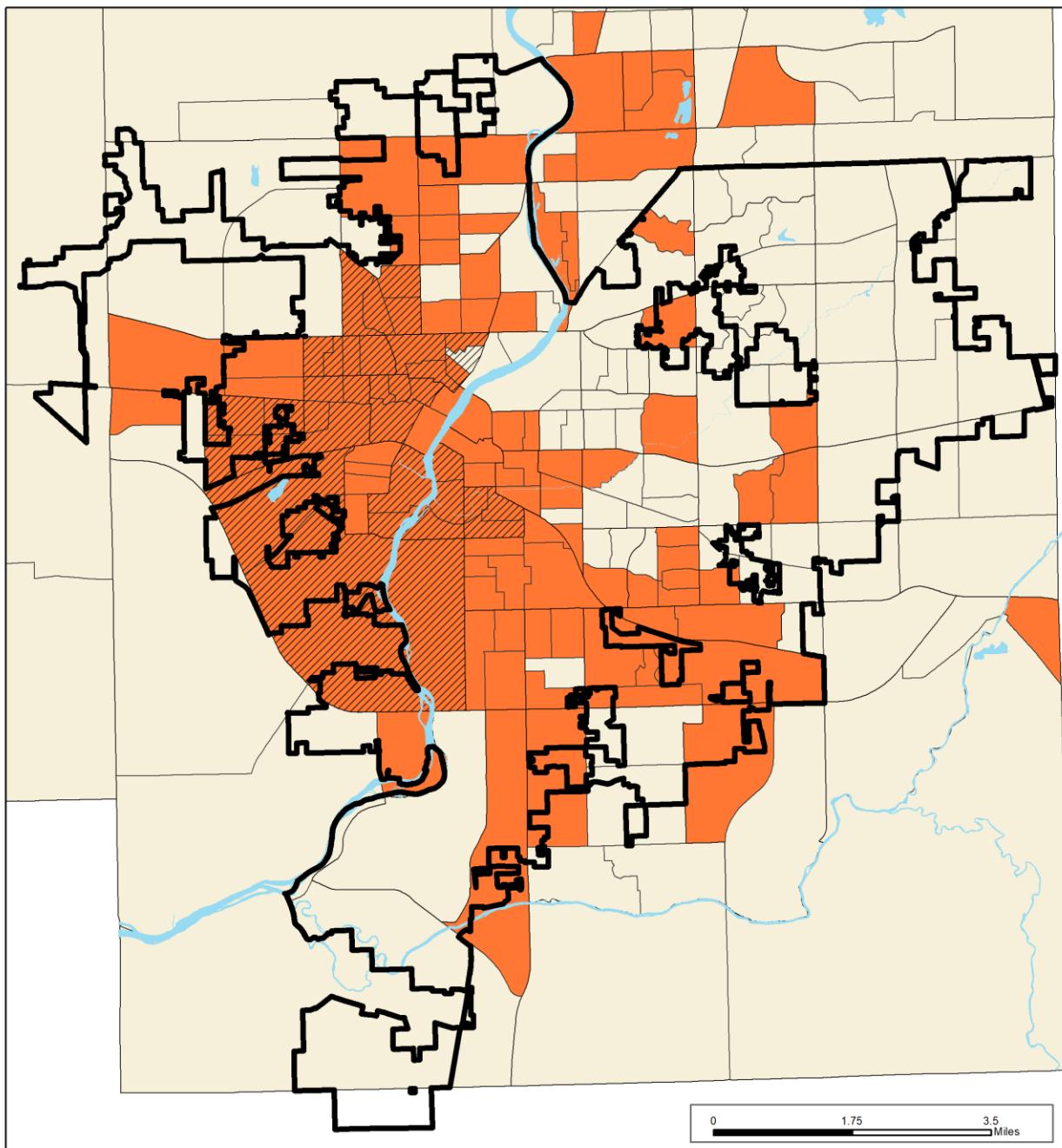
67% - 81%

82% - 97%



Map Produced: November 2024





2020 Census Block Groups - City of Rockford, Illinois

Showing Percent of Low-to-Moderate Income with 50% Minority Overlay

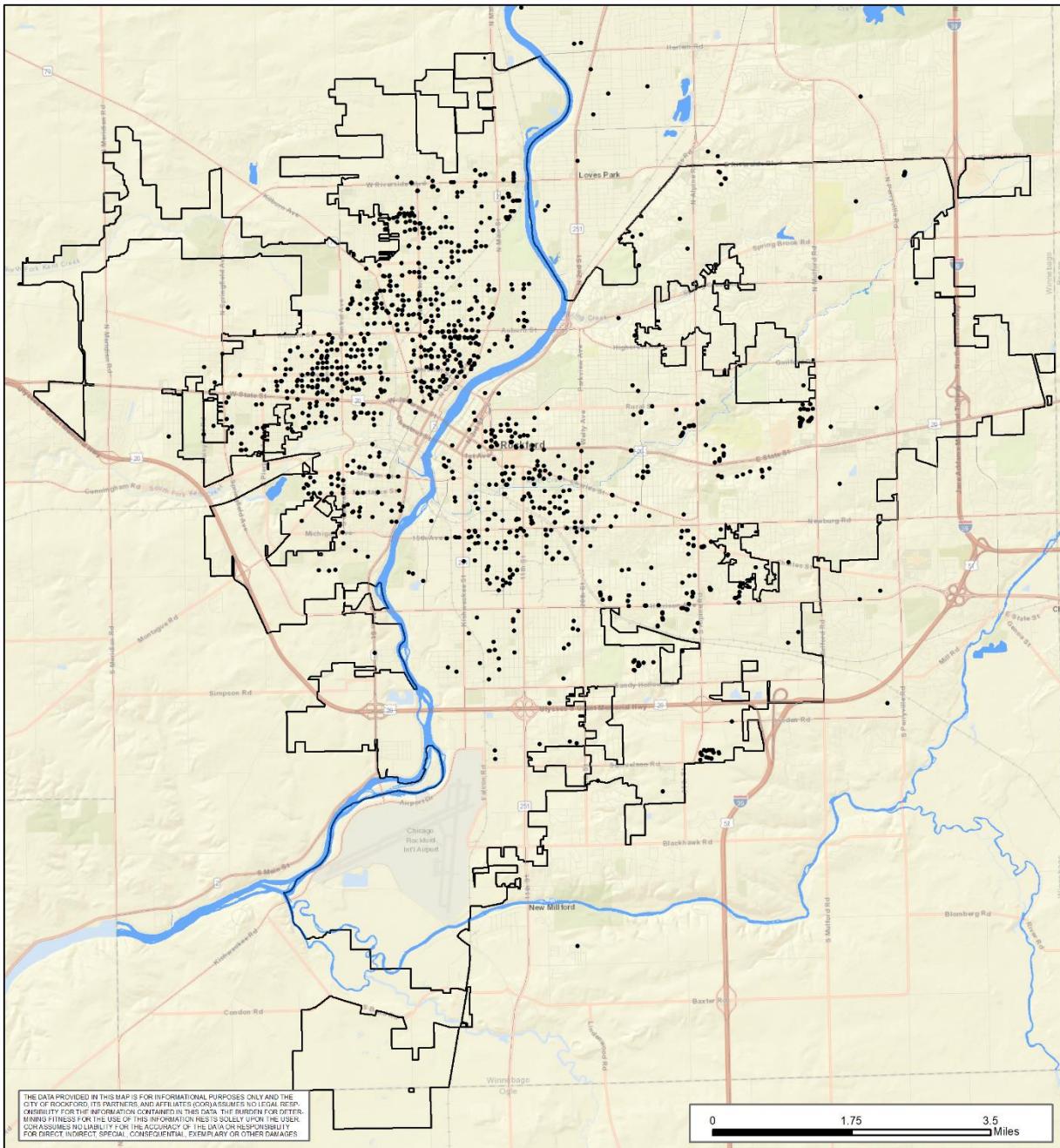


Percent Low-to-Moderate Income
50.1% - 100%

Percent Minority Population
51% - 84%



Map Produced: September 2024

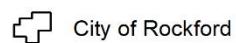


Section 8 Housing Site Locations

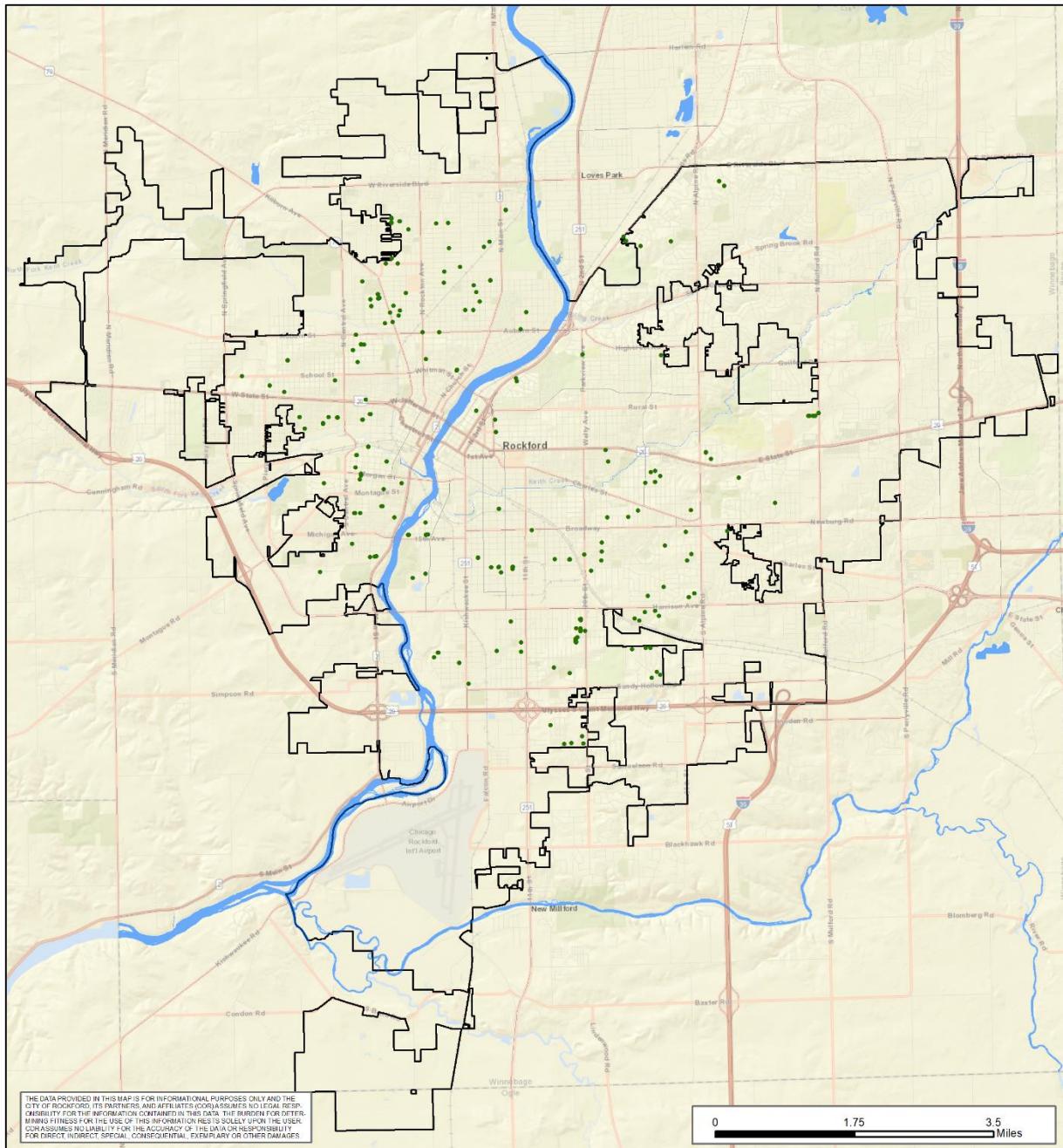
Rockford Housing Authority (RHA)



- Section 8 Site Locations



Map Produced: November 2024
Data Provided by Rockford Housing Authority (RHA)

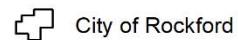


Scattered Public Housing Site Locations

Rockford Housing Authority (RHA)

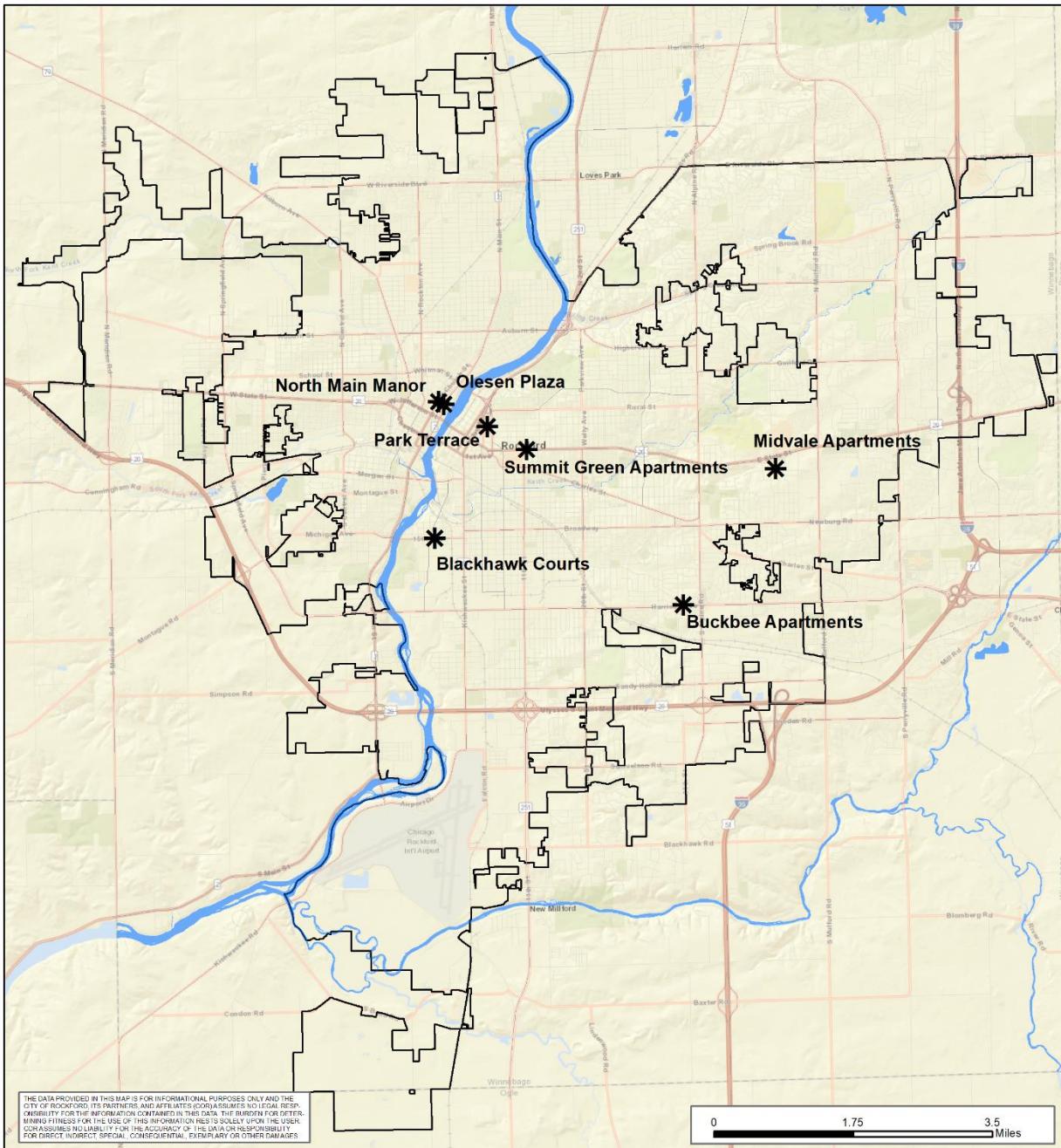


- Scattered Site Locations



Map Produced: November 2024
Data Provided by Rockford Housing Authority (RHA)





Major Public Housing Site Locations

Rockford Housing Authority (RHA)

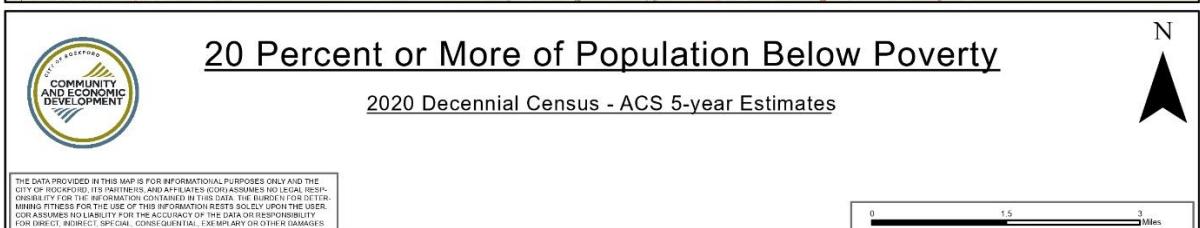
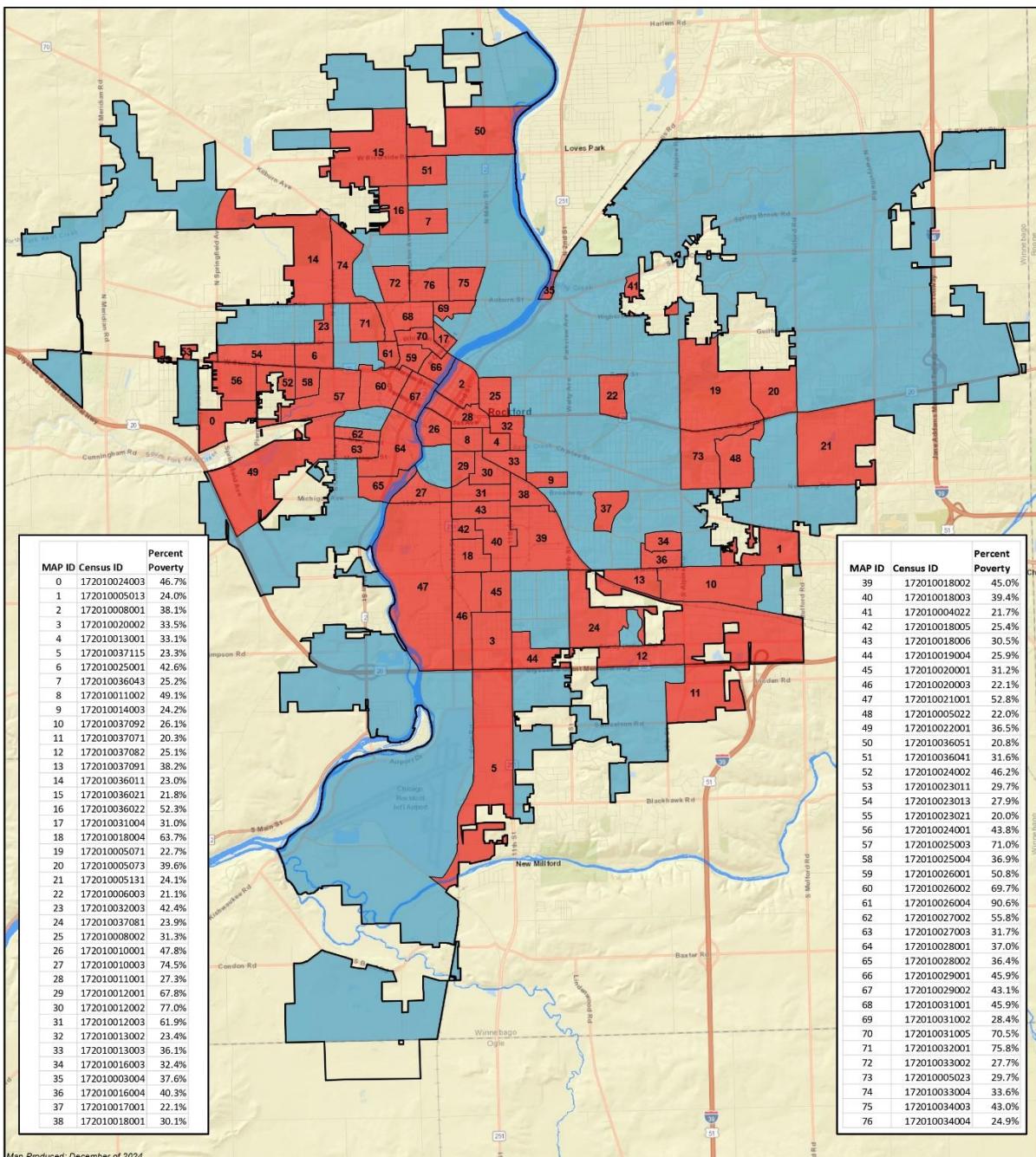


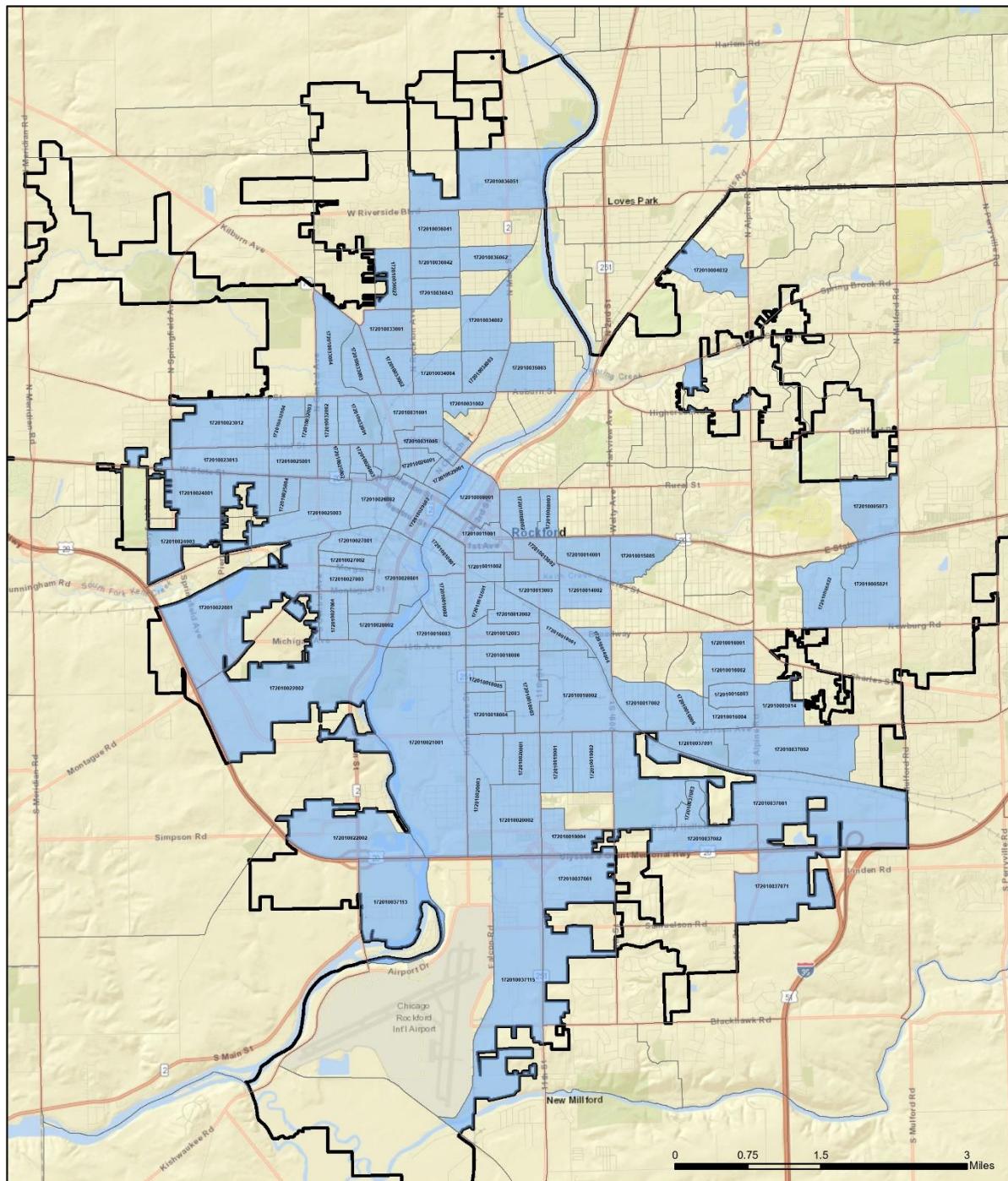
* Major Site Locations

 City of Rockford

Map Produced: November 2024

Data Provided by Rockford Housing Authority (RHA)





2024 CDBG Low-to-Moderate Income (LMI)
2016 - 2020 ACS Block Group Data



Low-to-Moderate Income
Rockford Municipal Boundary

Map Produced on 6/21/2024



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

Housing Strategy (High Priority)

Priority Need: There is a need to increase the amount of decent, safe, and sanitary housing that is affordable for homebuyers, homeowners, and renters. The City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032 identified an estimated demand for housing over the next ten years to be between 3,200 and 9,100 units.

Objective: Improve, preserve, and expand the supply of housing for low- and moderate-income households that is decent, safe, and sanitary. This includes, but is not limited to, creating Planned Unit Developments that encompass all housing levels, the construction of new single-family housing and duplexes within existing unbuilt subdivisions, and the rehabilitation of existing properties that not only extends the useful life of units, but makes them accessible for persons with disabilities, more energy efficient, and creates wealth through homeownership.

1. Housing New Construction – Increase the number of housing units in the City for owners and renters through new construction. This includes, but is not limited to, costs associated with acquisition, disposition, clearance, demolition, infrastructure, and new construction of residential housing.

2. Preservation of Housing – Preserve existing housing units in the City for owners and renters. This includes, but is not limited to, costs associated with acquisition, disposition, clearance, demolition, infrastructure, and the rehabilitation of residential housing.

3. Community Housing Development Organization (CHDO) Support & Development: Support CHDO's with operating dollars and development funds. This meets the HOME program 15% minimum set aside requirement for affordable housing. Funds would be used for the development of decent, safe, and sanitary housing for owners and renters. This includes, but is not limited to, costs associated with acquisition, new construction, reconstruction, and the rehabilitation of residential housing. In addition, eligible homebuyers purchasing any of the newly developed units may receive homebuyer assistance such as down payment, etc.

4. Homeownership – Create wealth through homeownership. Assistance includes, but is not limited to direct subsidies for down payment, closing costs, housing counseling fees, interest subsidies, etc.

5. Fair Housing – Promote fair housing choice through education, testing, training, and outreach in the City of Rockford.

6. Project Delivery – Support housing through project delivery, the comprehensive process of carrying out and completing housing units.

Homeless Strategy (High Priority)

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

Objective: Improve the living conditions and support services available for homeless persons, families, and those who are at risk of becoming homeless. The City will continue to work directly with fire and police to stay in touch with, monitor, and aid those who lack housing, or the means to obtain housing within the City. This includes, but is not limited to, rapid re-housing, homeless prevention, and condemnation relocation.

Goal:

1. To Reach Functional Zero for Families, Youth, and Single Adults: Supplement the Continuum of Care's efforts by identifying and engaging people at risk of and experiencing homelessness, intervening to prevent the loss of housing and divert people from entering the homelessness services system, and providing immediate access to shelter and crisis services. This includes, but is not limited to, efforts related to street outreach, emergency shelter, homeless prevention, rapid re-housing, operating, supporting the Homeless Management Information System (HMIS), and administration.

Community Development Strategy (High Priority)

Priority Need: There is a need to improve public facilities, such as parks, playgrounds, recreational areas, and trails. Improvements are needed on infrastructure such as bike trails, shared-use paths, roads, various transportation facilities and sidewalks, including ADA curb cuts. Flood mitigation is needed on roadways and neighborhoods. In addition, there is a need for improved access to public transit.

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

Goals:

1. Non-Housing Community Development Needs – Improve public facilities, infrastructure, and public safety. This includes, but is not limited to, rehabilitation, reconstruction, and new construction of community spaces and infrastructure such as streets, sidewalks, bridges, curbs, storm water & sanitary sewer, accessibility improvements, the removal of architectural barriers, community policing and ability to respond to emergencies in the City, etc.

2. Public Services – Supplement public services (including labor, supplies, and materials) for low to moderate-income persons, including persons with other special needs. This includes, but is not limited to adding new services or making a quantifiable increase in the level of existing services for services such as employment, crime prevention, childcare, health, drug abuse, education, fair housing counseling, energy conservation, welfare, or recreational needs.

- 3. Clearance/Demolition** – Remove and eliminate slum and blighting conditions through demolition of vacant, abandoned, and dilapidated structures.

Economic Development Strategy (High Priority)

Priority Need: There is a need to have efficient business development, expansion, diversification, job growth, and innovation. In addition, there is a need to support sustainable and equitable economic development.

Objective: Improve and expand economic opportunities in the City for low- and moderate-income persons through investing in businesses and properties (commercial and industrial) throughout Rockford.

Goals:

- 1. Business Support** – Provide financial support to start and/or grow businesses.
- 2. Property Development** – Develop new and existing commercial and industrial properties through means such as acquisition, disposition, clearance, demolition, remediation, preservation, renovation, etc.

Administration, Planning, and Management Strategy (High Priority)

Priority Need: There is a need for planning, administration, management, and oversight of Federally funded programming.

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

Goals:

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

3. Evaluation of past performance

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

The Department of Housing and Urban Development (HUD) is charged with making a comprehensive performance review of the City's overall progress annually and each year HUD states that the City continues to have the capacity to administer funding and, therefore, is successful in its administration of CDBG, HOME, and ESG grant funds. The abbreviated 2023 accomplishments table below, provides a snap shot of the City's progression toward its 2020-2024 Consolidated Plan goals as of the last reporting period.

Please note while reviewing the table below:

- 2023 is the 4th year of the 2020-2024 Consolidated Plan.
- The CDBG, HOME, and ESG award occurred in June 2023.
- The City's fiscal year is January 1 – December 31.
- Although funding is awarded annually, funds are expended over multiple years.
- Some accomplishments are counted immediately when the unit of measurement is met (CDBG & ESG funded activities), while others are counted when the project/activity is complete (HOME funded activities).
- Year End 2023, HS-1 goal: one rental development was underway, expecting eleven (11) units to be completed after a delay, in early 2024. In addition, another rental development was being prepped for City Council review and approval in early 2024.
- Year End 2023, HS-3 goal: five (5) homes were underway, anticipating purchases to take place early 2024.
- 2020, the year of COVID-19, was the first year of the 2020-2024 Consolidated Plan. Therefore, there were delays in providing assistance due to closures, adjusting to new protocols, and shifting funding to emergent needs.
- From January 2024 to the end of October 2024 there were 38 residential new construction permits totaling \$10 million in valuation and permit fees combined.
- From January 2024 to the end of October 2024 there were 525 commercial construction permits totaling \$170 million in valuation and permit fees combined.

Goal	Category	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete
CDS-2 Infrastructure	Non-Housing Community Development	Other	Other	3	2	67%
CDS-6 Clearance/Demolition	Non-Housing Community Development	Buildings Demolished	Buildings	175	121	69%
EDS-1, 2 & 3 Economic Development	Economic Development	Businesses assisted	Businesses Assisted	88	87	99%
HMS-1 Housing	Homeless	Other	Other	5	5	100%

HMS-2 Operation / Support	Homeless	Other	Other	10	18	180%
HMS-3 Prevention and Re-Housing	Homeless	Other	Other	5	5	100%
HS-1 Housing Development	Affordable Housing	Rental units rehabilitated	Household Housing Unit	32	0	0%
		Homeowner Housing Added	Household Housing Unit	3	0	0%
		Other	Other	3	0	0%
HS-2 Housing Rehabilitation	Affordable Housing	Homeowner Housing Rehabilitated	Household Housing Unit	125	94	75%
HS-3 Homeownership	Affordable Housing	Direct Financial Assistance to Homebuyers	Households Assisted	40	7	17.5%
HS-4 Fair Housing	Affordable Housing	Other	Other	5	0	0%

Considering past performance, the research needed to complete the 2040 Comprehensive Plan (October 2023) and COR, IL Housing Needs Assessment and Market Study 2023-2032, and the consultations for this Five-Year Consolidated Plan, it is in the City's best interest to continue with a broad Consolidated Plan. Community needs are similar and, as in the past, the City needs to work with cross sector partners to make any kind of impact on those needs. Broad Plans, which include all the needs, allow the City to support partners with Certificates of Consistency to the City's Consolidated Plan when applying for grants. In addition, flexibility is essential; as the community continues to evolve, so does the City.

4. Summary of citizen participation process and consultation process

Following the City's Citizen Participation Plan, the City held four (4) public hearings, two (2) during September 2024 and two (2) during December. The City exceeded the required thirty (30) day comment period by having all of the drafts available for review and comment from Wednesday, November 27, 2024 through Monday, December 30, 2024.

September Meetings: After a brief explanation of the Federal funding and recent City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032, community members were given an

opportunity to provide their opinion of local housing, homeless, economic development, and community needs.

City staff encouraged all to complete survey questions. These questions were not only answered one on one with staff members at the September public hearings, but surveys were distributed through email distribution lists and were available on the City's website as well. In addition, survey questions were presented at meetings held with a wide range of providers, citizens, advocacy groups, public and private agencies, and community leaders. For a full list of parties that the City consulted with, see PR-10 Consultation.

December Meetings: City staff communicated details and requested comments on this proposed Five-Year Consolidated Plan, 2025 Annual Action Plan, and 2025-2029 Analysis of Impediments to Fair Housing Choice.

See PR-15 Citizen Participation for additional details, including information regarding the required public notices.

5. Summary of public comments

A summary of comments received as the City was developing the Five-Year Consolidated Plan, 2025 Annual Action Plan, and 2025-2029 Analysis of Impediments to Fair Housing Choice include, but are not limited to the following::

- Provide for decent housing inventory (including accessible housing) and choice for low and moderate-income households of all ages and stages of life.
- Create supportive services for youth, young adults, victims, and veterans experiencing trauma and mental illness.
- Develop crisis and transitional housing with supportive services for a number of populations, including but not limited to victims, LGBTQ+, veterans, and homeless youth.
- Tenant, landlord and homebuyer education is essential.
- Provide for mentorship and guidance so businesses may thrive. And, market the resources that are already available.
- Remove language (including Arabic and Spanish), financial, and education barriers.
- Embrace diversification, including emerging technologies.
- Create a stable workforce. Workforce development is crucial.
- Redevelop vacant sites, improve curb appeal and the perception of Rockford, including downtown.
- Create diversified job force of well paying, union, or skilled labor.
- Need to continue consulting, training, coaching. Incentivize higher education (trades, apprenticeships, associates degrees, or 4-year college degrees).
- Address crime and poverty
- Start a loan fund for green energy projects.
- Review nuisance ordinance to ensure that it does not displace victims of domestic violence

- Work with the County to understand why homeowners are losing their homes in tax sales and how the County could work with those homeowners

See PR-15 for additional details, including a full summary of comments received.

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

All comments received to date have been reviewed and considered when developing this Five-Year Consolidated Plan, 2025 Annual Action Plan, and the 2025-2029 Analysis of Impediments to Fair Housing Choice.

7. Summary

The City is presenting this FY 2025-2029 Five Year Consolidated Plan (CP), FY 2025 Annual Action Plan (AAP), and 2025-2029 Analysis of Impediments to Fair Housing Choice (AI) to demonstrate how the City plans to collaborate with cross sector partners to meet the housing, homeless, other special needs, community development, and economic development needs within Rockford.

The estimated funding levels to meet the needs are as follows:

- Community Development Block Grant: \$2,219,358 (2025), \$11,096,790 (2025-2029)
- HOME Investment Partnerships Program: \$928,634.40 (2025), \$4,643,172 (2025-2029)
- Emergency Solutions Grant: \$192,497 (2025), \$962,485 (2025-2029)

2025 funding levels are based on 2024 funding levels and are contingent on the final approval of the Federal FY 2025 budget. The 2025-2059 budget assumes that City allocations will remain the same over the next five (5) years.

The City followed its Citizens Participation Plan and all of the consultation requirements to gather comments from a wide range of providers, citizens, advocacy groups, public and private agencies, and community leaders. All comments are taken into consideration as the CP, AAP, and AI are solidified by City of Rockford City Council and ultimately submitted to the Department of Housing and Urban Development once 2025 allocations have been announced.

The Process

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

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

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

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

Table 1 – Responsible Agencies

Narrative

The City's Department of Community and Economic Development (CED) facilitates the development of the Five-Year Consolidated Plan, the corresponding Annual Action Plans, and the Consolidated Annual Performance and Evaluation Reports (CAPERs). CED administers the Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME), while the Department of Health and Human Services (HHS) administers the Emergency Solutions Grant (ESG). Administration includes, but is not limited to, environmental reviews, program development and implementation, procurement, systems reporting, monitoring, and general day-to-day oversight.

The City staff that were involved with the development of the City's 2040 Comprehensive plan (adopted by City Council late 2023), is the same seasoned staff that was involved with the development of the City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032, and this Five-Year Consolidated Plan. In addition, staff directly involved with the development of the public housing authority plans were involved with the development of this Five-Year Consolidated Plan. This brings continuity between all of the Plans.

Consolidated Plan Public Contact Information

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PR-10 Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

While preparing the FY 2025-2029 Five Year Consolidated Plan and FY 2025 Annual Action Plan, City staff not only met internally on a regular basis throughout the planning process, but also consulted regularly with the local public housing authorities responding directly to the public housing needs in the community using the data from their five-year plans.

To assist with gathering community input, City staff encouraged everyone they consulted with to complete survey questions. These questions were not only answered one on one with staff members at the September public hearings, but surveys were distributed through email distribution lists and were available on the City's website. In addition, survey questions were presented at all planning focus group meetings and listening sessions held by City staff with a wide range of providers, citizens, advocacy groups, public and private agencies, and community leaders. For a full list parties that the City consulted with, see the Consultation Table below.

The data, information, and maps were all developed by utilizing local data and the City's Comprehensive Planning & Design Coordinator's knowledge gained from developing the City's 2040 Comprehensive Plan (City Council adopted October 2023), the City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032 (Published April 2024), and ongoing planning efforts through the Thriving Communities Working Group, Built for Zero, and the City of Rockford Community Relations Commission.

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)).

To ensure a coordinated approach, City staff continues to build connections with agencies engaged in meeting the needs of the community, and therefore, always having open communication regarding the City's Consolidated and Annual Action Plans. For example, see below for a list of connections already in place with the Rockford Housing Authority (RHA) and the Winnebago County Housing Authority (WCHA)

- Both agencies administer housing voucher programs, provide a number of social services, and are housing developers.

- City is the Responsible Entity for RHA Environmental Reviews
- City Mayor appoints commissioners to the RHA Board of Commissioners and meets with the RHA Chief Executive Officer on a regular basis
- Both housing authorities were panelists for the public meetings held by the Community Relations Commission, which acts as an advisory board to the Mayor and City Council.

- Both are currently participating in the Thriving Communities Working Group, which is creating a shared vision for an actionable housing plan as the City deploys transportation investments. The Group meets quarterly in perpetuity to coordinate plans, land use, and development.
- Both have provided project-based vouchers to Low Income Housing Tax Credit rental developments, while the City has provided gap financing.

Besides the public housing authorities, other cross sector partners participate in the Thriving Communities Working Group, and some were panelists for the Community Relations Commission public meeting mentioned above, as well. Table 2 below indicates, which organizations continue to participate in Thriving Communities Working Group, and which where were panelists for the public meeting for the Commissioners.

Another effort that keeps the City connected with cross sector partners is the Community based Organizations Group. This group of organizations is newly established and will remain an ad hoc advisory committee as the City launches its Housing Strategies in 2025.

The City's 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 programming. In 2025, this staff member will be working with Public Works, Police, and Fire to coordinate neighborhood efforts, and with local residents to host block parties.

In addition to the above, the next two (2) sections below describe how the City connects with the Continuum of Care, an all of its members.

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 Northern Illinois Homeless Coalition (Coalition) serves as the Department of Housing and Urban Development (HUD) recognized Continuum of Care (CoC), the decision-making body for homeless program coordination serving Winnebago, Boone, and DeKalb Counties. The City's Health and Human Services Department, specifically the Community Services Division, provides support and technical assistance to the Northern Illinois Homeless Coalition. In addition, Community Services is responsible for coordinating the application process for, and the administration of both, the HUD CoC competitive grant and the Emergency Solutions Grant (ESG); therefore, working very closely with the agencies providing services to homeless persons, particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth.

The Coalition includes a broad representation of agencies and interested individuals that are responsible for the following:

- Community wide planning and strategic use of resources to address homelessness.

- Improving coordination and integration with mainstream resources and other programs targeted toward people experiencing homelessness.
- Promoting the quick re-housing of homeless individuals and families, and
- Improving data collection and performance measurements to ensure program success.

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

City staff works closely with and participates in the development of the CoC, working with area service providers to include City resources, to the extent possible, and in the provision of services to homeless individuals and families in Rockford. Therefore, the City and CoC, together, have developed performance standards, policies, and procedures for all funding, including ESG funds. This includes, but is not limited to, programmatic policies such as Rapid Rehousing Assistance, and policies regarding non-separation of families, domestic violence survivor relocation, and the use of Homeless Management Information System (HMIS).

City staff actively participates in the monthly CoC membership meetings, as there is a standing agenda item for City staff to discuss all matters at hand. The City's Homeless Program Manager (HPM) is on the Board of the CoC. Therefore, the HPM participates in all of the Board meetings. In addition, City staff participates on a number of sub committees such as Membership, Public Relations, and the Mental Health & Homelessness Committee.

In addition, the City and many members of the CoC participate in Built for Zero Community Solutions nationwide initiative. Table 2 below indicates which organizations participate in Built for Zero.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Accelerating Creatives & Entrepreneurs (ACE)
	Agency/Group/Organization Type	Regional organization Planning organization Business Leaders
	What section of the Plan was addressed by Consultation?	Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Leaders participated in the one of the Economic Development listening sessions held by the City.
2	Agency/Group/Organization	Birth to Five Illinois
	Agency/Group/Organization Type	Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency participated in the Education and Disability planning focus group meetings that the City held.
3	Agency/Group/Organization	Brightpoint
	Agency/Group/Organization Type	Services-Children Services-Education Child Welfare Agency
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in the Continuum of Care.
4	Agency/Group/Organization	Brooke Rd United Methodist Church/Community Center
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Education Services - Victims Civic Leaders Religious Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Community Center participated in the Diverse Resident Supports planning focus group meeting held by the City.
5	Agency/Group/Organization	Carpenter's Place
	Agency/Group/Organization Type	Housing Services – Housing Services-Persons with Disabilities Services-Survivors of Domestic Violence Services-homeless Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs – Chronically homeless Homeless Needs – Families with children Homelessness Needs – Veterans Homelessness Needs – Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in Built for Zero, the Case Conferencing and Coordinated Entry committees, and the Continuum of Care.
6	Agency/Group/Organization	Catholic Charities
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency participated in the Diverse Resident Supports planning focus group meeting held by the City.

7	Agency/Group/Organization	City of Rockford Community & Economic Development Department
	Agency/Group/Organization Type	Housing Services-homeless Services - Victims Agency - Management of Public Land or Water Resources Planning organization Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Department staff participated in the Internal planning focus group meeting.
	Agency/Group/Organization	City of Rockford Fire Department
8	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Services - Victims Agency - Managing Flood Prone Areas Agency - Emergency Management Other government - Local Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Department staff participated in the Internal planning focus group meeting.

9	Agency/Group/Organization	City of Rockford Health & Human Services Department - Community Action Agency
	Agency/Group/Organization Type	Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Education Services-Employment Services - Victims Agency - Emergency Management Other government - Local Regional organization Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Agency participated in the Consolidated Plan Housing Needs Analysis planning focus group meetings, and department staff participated in the Internal planning focus group meeting.
10	Agency/Group/Organization	City of Rockford Mayor's Office
	Agency/Group/Organization Type	Services-Health Agency - Emergency Management Other government - Local Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Staff participated in the Health, Mental Health, and Internal planning focus group meetings that the City held.

11	Agency/Group/Organization	City of Rockford Police Department
	Agency/Group/Organization Type	Services - Housing Services-homeless Services - Victims Agency - Emergency Management Other government - Local Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Department staff participated in the Internal planning focus group and participates with the Homeless Outreach.
12	Agency/Group/Organization	Coalition of Latino Leaders/Rkfd Regional Hispanic Chamber of Commerce
	Agency/Group/Organization Type	Regional organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Coalition leaders participated in the Diverse Resident Supports planning focus group meeting and one of the Economic Development listening sessions held by the City.
13	Agency/Group/Organization	Coextro
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	Digital Divide
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation was through email with a Coextro executive.
14	Agency/Group/Organization	Crusader Community Health
	Agency/Group/Organization Type	Services-Health Health Agency Publicly Funded Institution/System of Care

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in the Continuum of Care, and the Mental Health and Homelessness and Medical Respite committees.
15	Agency/Group/Organization	Department of Veteran Affairs (VA)
	Agency/Group/Organization Type	Housing Services-Persons with Disabilities Services-homeless Services-Health Services-Education Service-Fair Housing Health Agency Publicly Funded Institution/System of Care Other government - Federal
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in Built for Zero, the Case Conferencing and Coordinated Entry committees, the Continuum of Care, and Get You Housed. This agency participated in the Veteran and Senior Services planning focus group meetings that the City held.
16	Agency/Group/Organization	Edgewater Neighborhood
	Agency/Group/Organization Type	community members Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Residents participated in the Neighborhood planning focus group meetings held by the City.

17	Agency/Group/Organization	Family Violence Coordinating Council-Winnebago County 17th Judicial Circuit Court
	Agency/Group/Organization Type	Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Service-Fair Housing Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A council member participated in the Social Services planning focus group held by the City.
18	Agency/Group/Organization	Goodwill Industries of Northern Illinois
	Agency/Group/Organization Type	Services-Persons with Disabilities Services-Education Services-Employment Service-Fair Housing Regional organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency participated in the Social Services planning focus group meeting that the City held.
19	Agency/Group/Organization	Gorman & Company
	Agency/Group/Organization Type	Housing Services - Housing Regional organization Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Gorman & Company representatives participated in the Consolidated Plan Housing Needs Analysis planning focus group meeting that the City held.
20	Agency/Group/Organization	Greater Rockford Chamber of Commerce
	Agency/Group/Organization Type	Regional organization Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Market Analysis Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Chamber representatives participated in the Consolidated Plan Housing Needs Analysis planning focus group meeting that the City held.
21	Agency/Group/Organization	Harmony Realty Group LLC
	Agency/Group/Organization Type	Services – Housing Business Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in the Thriving Communities Working Group.
22	Agency/Group/Organization	House of God Church
	Agency/Group/Organization Type	Services - Housing Services-Education Civic Leaders Religious Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Church participated in the Diverse Resident Supports planning focus group meeting held by the City.

23	Agency/Group/Organization	I Bike Rockford
	Agency/Group/Organization Type	Regional organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development Other: Infrastructure
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in the Thriving Communities Working Group.
24	Agency/Group/Organization	i3 Broadband
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	Digital Divide
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation was through email with a i3 Broadband executive.
25	Agency/Group/Organization	Illinois Department of Children & Family Services (DCFS)
	Agency/Group/Organization Type	Services - Housing Services-Children Services - Victims Child Welfare Agency Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency participated in the Social Services planning focus group meeting that the City held.
26	Agency/Group/Organization	Illinois Housing Development Authority
	Agency/Group/Organization Type	Housing Services - Housing Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in the Thriving Communities Working Group. City staff interviewed an IHDA executive.
27	Agency/Group/Organization	J Jeffers & Company
	Agency/Group/Organization Type	Housing Business Leaders Major Employer
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Company representatives participated in the Consolidated Plan Housing Needs Analysis planning focus group meeting that the City held.
28	Agency/Group/Organization	Lewis Lemon Neighborhood
	Agency/Group/Organization Type	community members Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Residents participated in the Neighborhood planning focus group meetings held by the City.
29	Agency/Group/Organization	Liam Foundation
	Agency/Group/Organization Type	Services - Housing Services-Persons with Disabilities Services-Survivors of Domestic Violence Services-homeless Services-Health Service-Fair Housing Civic Leaders Foundation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Foundation participated in the Diverse Resident Supports planning focus group meeting held by the City.
30	Agency/Group/Organization	Lincolnwood Estates
	Agency/Group/Organization Type	community members Neighborhood Organization

	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Residents participated in the Neighborhood planning focus group meetings held by the City.
31	Agency/Group/Organization	Meet My Shoes
	Agency/Group/Organization Type	Services-homeless Veterans
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homelessness Needs - Veterans
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in the Continuum of Care.
32	Agency/Group/Organization	Mercy Health
	Agency/Group/Organization Type	Health Agency Publicly Funded Institution/System of Care Business Leaders Major Employer
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency representatives participated in the Consolidated Plan Housing Needs Analysis planning focus group meeting that the City held.
33	Agency/Group/Organization	Midland States Bank
	Agency/Group/Organization Type	Civic Leaders Private Sector Banking / Financing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in the Thriving Communities Working Group. In addition, agency representatives participated in the Consolidated Plan Housing Needs Analysis planning focus group meeting that the City held.
34	Agency/Group/Organization	Mile Square Health Center - LP Johnson Rockford
	Agency/Group/Organization Type	Services-Health Health Agency Regional organization

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency participated in the Social Services planning focus group meeting that the City held.
35	Agency/Group/Organization	Miss Carly's
	Agency/Group/Organization Type	Services-homeless Services-Education
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in the Continuum of Care.
36	Agency/Group/Organization	Mobile Integrated Health
	Agency/Group/Organization Type	Services-Health Services-Education Agency - Emergency Management Other government - Local
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in Built for Zero, the case conferencing and mental health and homelessness committees, and the Continuum of Care. In addition, City Fire is the Lead agency of this collaboration.
37	Agency/Group/Organization	National Alliance on Mental Illness (NAMI) Northern Illinois
	Agency/Group/Organization Type	Services-Persons with Disabilities Services-Health Services-Education Regional organization

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency participated in the Health and Mental Health planning focus group meetings that the City held.
38	Agency/Group/Organization	National Youth Advocate Program
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless Services-Education Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Needs - Unaccompanied youth Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency participated in the Education and Disability planning focus group meetings that the City held.
39	Agency/Group/Organization	Northern Illinois Food Bank
	Agency/Group/Organization Type	Regional organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency participated in the Social Services planning focus group held by the City.

40	Agency/Group/Organization	Northern Illinois Homeless Coalition
	Agency/Group/Organization Type	Services – Victims Services-homeless Regional organization Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Homeless Needs – Chronically homeless Homeless Needs – Families with children Homelessness Needs – Veterans Homelessness Needs – Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was formerly known as the Rockford River Homeless Coalition. This agency is also known as the local Continuum of Care of which City staff actively participates in the monthly CoC membership and Board meetings. In addition, City staff participates on a number of sub committees such as Membership, Public Relations, and the Mental Health & Homelessness Committee.
41	Agency/Group/Organization	Illinois Realtors Government Affairs, representing NW Illinois Alliance of Realtors
	Agency/Group/Organization Type	Housing Services – Housing Services-Education Services-Fair Housing Regional organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	NW Illinois Alliance of Realtors was formerly known as the Rockford Area Association of Realtors. The City has continued communication with this agency, as the agency participates in the Thriving Communities Working Group. The Association is a Community Relations Commission Panelist. City staff interviewed Association representatives and attended their government affairs meeting. In addition, Association representatives participated in the Consolidated Plan Housing Needs Analysis planning focus group meeting that the City held.
42	Agency/Group/Organization	Prairie State Legal Services
	Agency/Group/Organization Type	Service-Fair Housing Regional organization Planning organization Civic Leaders

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in the Continuum of Care (interviewing). This agency participated in the Consolidated Plan Housing Needs Analysis planning focus group meeting that the City held.
43	Agency/Group/Organization	RAMP Center for Independent Living
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Education Services-Employment Service-Fair Housing Regional organization Planning organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in the Continuum of Care. In addition, the Agency participates in the Thriving Communities Working Group, and participated in the Education and Disability planning focus group meetings that the City held.
44	Agency/Group/Organization	Region 1 Planning Council/Northern Illinois Land Bank
	Agency/Group/Organization Type	Housing Services - Housing Other government - Federal Regional organization Planning organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in the Thriving Communities Working Group. The Council is a Community Relations Commission Panelist. City staff interviewed Council representatives, and representatives participated in the Consolidated Plan Housing Needs Analysis planning focus group meeting that the City held.
45	Agency/Group/Organization	Remedies Renewing Lives
	Agency/Group/Organization Type	Housing Services - Housing Services-Victims of Domestic Violence Services-homeless Services-Health Services - Victims Agency - Emergency Management
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in Built for Zero, the Case Conferencing and Coordinated Entry committees, the Continuum of Care, and Get You Housed. This agency participated in the Social services planning focus group meeting that the City held.
46	Agency/Group/Organization	Rock Valley College
	Agency/Group/Organization Type	Services-Education Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Rock Valley College representatives participated in the Education and Disability planning focus group.
47	Agency/Group/Organization	Rockford Apartment Association
	Agency/Group/Organization Type	Housing Services - Housing Regional organization Business Leaders

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in the Thriving Communities Working Group. The Association is a Community Relations Commission Panelist. Association representatives participated in the Consolidated Plan Housing Needs Analysis planning focus group meetings and City staff attended one of the Association's membership meetings.
48	Agency/Group/Organization	Rockford Area Habitat for Humanity
	Agency/Group/Organization Type	Housing Services – Housing Services-Education Services-Fair Housing Regional organization Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis Anti-poverty Strategy Other – Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in the Thriving Communities Working Group. Habitat is a Community Relations Commission Panelist. In addition, Habitat representatives participated in the Consolidated Plan Housing Needs Analysis planning focus group meeting that the City held.
49	Agency/Group/Organization	Rockford Branch of the NAACP
	Agency/Group/Organization Type	Services-Education Service-Fair Housing Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Staff interviewed NAACP executive. NAACP representatives participate in West Gateway Meetings. In addition, NAACP representatives participated in one of the Economic Development listening sessions held by the City.

50	Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation? How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Rockford Community Investment Fund Services – Housing Community Development Financial Institution Housing Need Assessment Market Analysis Economic Development The City has continued communication with this agency, as the agency participates in the Thriving Communities Working Group. In addition, Rockford Community Investment Fund representatives participated in the Consolidated Plan Housing Needs Analysis planning focus group meeting that the City held.
51	Agency/Group/Organization Agency/Group/Organization Type What section of the Plan was addressed by Consultation? How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Rockford Family Peace Center Services - Housing Services-Children Services-Persons with Disabilities Services-Victims of Domestic Violence Services-Education Services-Employment Services - Victims Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Market Analysis The City has continued communication with this agency, as the agency participates in the Continuum of Care. In addition, the Center was established through the City's Mayor's Office and therefore, participated in the City's Internal planning focus group meeting.
52	Agency/Group/Organization Agency/Group/Organization Type	Rockford Housing Authority Housing PHA Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Education Services-Employment Service-Fair Housing Other government - Local Planning organization

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in the Case Conferencing committee, and Get You Housed. In addition, the agency participates in the Thriving Communities Public Sector Working Group, and is a Community Relations Commission Panelist.
53	Agency/Group/Organization	Rockford Local Development Corporation
	Agency/Group/Organization Type	Services-Employment Business Leaders Community Development Financial Institution
	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Corporation executives participated in one of the City's Economic Development listening sessions.
54	Agency/Group/Organization	Rockford Public School District 205
	Agency/Group/Organization Type	Services-Children Services-homeless Services-Education Other government - Local Major Employer
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency participated in the Education, Disability, and Consolidated Plan Housing Needs Analysis planning focus group meetings that the City held.

55	Agency/Group/Organization	Rockford Regional Health Council
	Agency/Group/Organization Type	Services-Health Services-Education Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency participated in the Health and Mental Health planning focus group meetings that the City held.
56	Agency/Group/Organization	Rockford Rescue Mission
	Agency/Group/Organization Type	Services-homeless Services-Health Services-Education Services-Employment Planning organization
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in Built for Zero, the Case Conferencing, Coordinated Entry, and Mental Health and Homelessness committees, and the Continuum of Care.
57	Agency/Group/Organization	Rockford Township
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-homeless Other government - Local
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in Built for Zero, the Case Conferencing, Coordinated Entry, and Mental Health and Homelessness committees, and the Continuum of Care (ranking and scoring for awards).

58	Agency/Group/Organization	Rosecrance Ware Center
	Agency/Group/Organization Type	Housing Services-Persons with Disabilities Services-homeless Services-Health Health Agency Child Welfare Agency Regional organization Business Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in Built for Zero, the Case Conferencing, Coordinated Entry, Mental Health and Homelessness committees, the Continuum of Care, and Get You Housed. This agency participated in the Health & Mental Health planning focus group meeting that the City held.
59	Agency/Group/Organization	Schmeling Building Supply
	Agency/Group/Organization Type	Business Leader
	What section of the Plan was addressed by Consultation?	Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	City staff consulted directly with the business owner through email.
60	Agency/Group/Organization	Shelter Care Ministries
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in Built for Zero, the Case Conferencing, Coordinated Entry, Mental Health and Homelessness committees, the Continuum of Care, and Get You Housed.
61	Agency/Group/Organization	Small Business Development Center
	Agency/Group/Organization Type	Services-Education Services-Employment Regional organization Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Development Center executives spoke in person with Economic Development staff.
62	Agency/Group/Organization	St Vincent DePaul
	Agency/Group/Organization Type	Services - Housing Services-homeless Emergency Hotels
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in the Continuum of Care and on the Winter Weather committee.
63	Agency/Group/Organization	Staseline Real Estate LLC
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency participated in the Diverse Resident Supports planning focus group meetings that the City held.
64	Agency/Group/Organization	Stepping Stones of Rockford
	Agency/Group/Organization Type	Housing Services-Persons with Disabilities Health Agency

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency participated in the Health and Mental Health planning focus group meetings that the City held.
65	Agency/Group/Organization	Studio GWA
	Agency/Group/Organization Type	Business Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in the Thriving Communities Working Group. Studio GWA is a Community Relations Commission Panelist.
66	Agency/Group/Organization	SWIFTT
	Agency/Group/Organization Type	Business Leaders
	What section of the Plan was addressed by Consultation?	Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	SWIFTT representatives participated in one of the City's Economic Development listening sessions.
67	Agency/Group/Organization	The Salvation Army of Rockford & Winnebago County
	Agency/Group/Organization Type	Services - Housing Services-homeless Agency - Emergency Management
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in the Continuum of Care.
68	Agency/Group/Organization	The Workforce Connection
	Agency/Group/Organization Type	Services-Education Services-Employment Regional organization Planning organization Business and Civic Leaders

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency representatives participated in the Consolidated Plan Housing Needs Analysis planning focus group meeting that the City held.
69	Agency/Group/Organization	Tommy Corral Memorial Foundation
	Agency/Group/Organization Type	Services-Persons with Disabilities Services-homeless Services-Health Services-Education Services - Victims Regional organization Foundation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency participated in the Health and Mental Health planning focus group meetings that the City held.
70	Agency/Group/Organization	University of Illinois College of Medicine Rockford
	Agency/Group/Organization Type	Services-Health Services-Education Health Agency
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in the Continuum of Care (Membership and Public Relations).

71	Agency/Group/Organization	UW Health Swedish American Hospital
	Agency/Group/Organization Type	Services - Housing Services - Victims Health Agency Agency - Emergency Management Publicly Funded Institution/System of Care Regional organization Major Employer
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homelessness Needs - Veterans Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency participated in the Veteran and Senior Services planning focus group meetings that the City held.
72	Agency/Group/Organization	Veterans Drop-in Center
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Health Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homelessness Needs - Veterans Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency participated in the Veteran and Senior Services planning focus group meetings held by the City.
73	Agency/Group/Organization	Veterans Path to Hope
	Agency/Group/Organization Type	Services - Housing Services-homeless Services-Employment
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homelessness Needs - Veterans
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in the Continuum of Care (ranking & scoring), and on the Case Conferencing and Coordinated Entry committees.

74	Agency/Group/Organization Agency/Group/Organization Type	West Gateway Coalition community members Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Residents participated in the Neighborhood planning focus group meetings held by the City.
75	Agency/Group/Organization Agency/Group/Organization Type	Winnebago County Health Department Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Health Agency Child Welfare Agency Publicly Funded Institution/System of Care Other government - County Regional organization Planning organization Civic Leaders Major Employer
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs HOPWA Strategy Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in Built for Zero, the Winter Weather committee, and the Continuum of Care.

76	Agency/Group/Organization	Winnebago County Housing Authority
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Persons with Disabilities Services-Education Services-Employment Other government - County Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Market Analysis Anti-poverty Strategy Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in Built for Zero, the Case Conferencing committee, and the Continuum of Care (ranking and scoring for awards). In addition, the agency participates in the Thriving Communities Working Group, is a Community Relations Commission Panelist, and participated in the Consolidated Plan Housing Needs Analysis planning focus group meeting that the City held.
77	Agency/Group/Organization	Xfinity
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Regional organization Business Leaders
	What section of the Plan was addressed by Consultation?	Economic Development Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation was through email with a Xfinity aka Comcast executive.

78	Agency/Group/Organization	Youth Services Network
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-homeless Services-Education Child Welfare Agency
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in Built for Zero, the Case Conferencing and Coordinated Entry committees, and the Continuum of Care.
79	Agency/Group/Organization	YWCA of Northwest Illinois
	Agency/Group/Organization Type	Services-Housing Services-Children Services-Victims of Domestic Violence Services-homeless Services-Education Services-Employment Service-Fair Housing Services-Victims Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development Anti-poverty Strategy Other: Infrastructure
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in the Thriving Communities Working Group.
80	Agency/Group/Organization	Zion Development Corporation
	Agency/Group/Organization Type	Housing Services – Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless Service-Fair Housing Regional organization 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 Non-Homeless Special Needs Market Analysis Economic Development Other – Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has continued communication with this agency, as the agency participates in the Continuum of Care, the Thriving Communities Working Group, and is a Community Relations Commission Panelist.

Table 2 – Agencies, groups, organizations who participated

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

All required agency types were consulted and therefore, given an opportunity to participate in the planning process.

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 Plan goals were incorporated into this Consolidated Plan and Annual Action Plan.
2040 Comprehensive Plan	City of Rockford	Principles within the Plan were incorporated into this Consolidated Plan and Annual Action Plan.
City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032	City of Rockford	Principles within the Study were incorporated into this consolidated plan and annual action plan.
National Resource Network Plan	City of Rockford	Plan goals were incorporated into this consolidated plan and annual action plan.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2020-2024 and the 2025-2029 Analysis of Impediments to Fair Housing Choice	City of Rockford	The Plan goals were incorporated into this consolidated plan and annual action plan.
Resiliency Plan	City of Rockford	The Plan goals were incorporated into this consolidated plan and annual action plan.
City of Rockford Zoning Ordinance	City of Rockford	Principles within the ordinances were incorporated into this consolidated plan and annual action plan.
The Rockford Historic Preservation Plan	Rockford Historic Preservation Commission	Principles within the Plan were incorporated into this consolidated plan and annual action plan.
Rockford Housing Authority Five Year Strategic Plan	Rockford Housing Authority	The Plan goals were incorporated into this consolidated plan and annual action plan.
RHA MTW Supplement Plan	Rockford Housing Authority	The Plan goals were incorporated into this consolidated plan and annual action plan.
Winnebago County Housing Authority 5-Yr Agency Plan	Winnebago County Housing Authority	The Plan goals were incorporated into this consolidated plan and annual action plan.
Moving to Work (MTW) Plan	Winnebago County Housing Authority	The Plan goals were incorporated into this consolidated plan and annual action plan.
Broadband Expansion-Rebuild Illinois	Illinois Department of Commerce	The Plan goals were incorporated into this consolidated plan and annual action plan.

Table 3 – Other local / regional / federal planning efforts

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

See Consultation Table above for all the public entities consulted in preparation for this consolidated plan and annual action plan. Generally, City staff was able to consult with a number of representatives on each of the following topics:

- Anti-poverty,
- Broadband/Digital Divide,

- Community Development,
- Disaster Mitigation,
- Economic Development,
- Homeless,
- Housing, and
- Special needs.

All parties were given the opportunity to review and comment on this Consolidated Plan and Annual Action Plan prior to submitting the plans to HUD.

Narrative (optional):

Not Applicable

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

Citizen participation, outreach and engagement was an important component of developing the 2025-2029 Consolidated Plan. Therefore, following the City's Citizen Participation Plan (included as an attachment), the City held four (4) public hearings, two (2) during September 2024 and two (2) during December. Copies of the published notices are attached. The City exceeded the required thirty (30) day comment period by having all of the drafts available for review and comment from Wednesday, November 27, 2024 through Monday, December 30, 2024.

September Public Hearings were held on Wednesday, September 18, 2024 and Tuesday, September 24, 2024, both at 4 pm, at Crusader Community Health. Crusader is located at 1200 W State St, Rockford IL 61102 and is accessible to persons with disabilities. After a brief explanation of the Federal funding and recent City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032, community members were given an opportunity to provide their opinions of local housing, homeless, economic development, and community needs. Handouts included an agenda, survey questions, the eligible uses of CDBG, HOME, and ESG, and contact information for written and/or oral comments. In addition, Sarah Leys, Deputy Director, who facilitated the Public Hearings explained how to submit comments, and asked participants to reach out and invite her to participate in meetings, one on one conversations, etc. to discuss the needs within the community.

December Public Hearings were held on Thursday, December 5, 2024, one at 12pm and one at 5:30 pm. Both were held at Crusader Community Health. City staff communicated details and requested comments on the proposed Five-Year Consolidated Plan, 2025 Annual Action Plan, and 2025-2029 Analysis of Impediments to Fair Housing Choice.

City staff encouraged all to complete survey questions. These questions were not only answered one on one with staff members at the September public hearings, but surveys were distributed through email distribution lists and were available on the City's website. In addition, survey questions were presented at planning focus group meetings and listening sessions held with a wide range of providers, citizens, advocacy groups, public and private agencies, and community leaders.

Public Hearing Survey Results:

Question	Options/Results
If an organization accepts federal funding, they have to work with all protected classes in the services they provide. If an organization is privately funded, they can limit their services to certain populations and do not have to serve all	Source of Income- 18% Race – 17% Age – 16% Familial Status – 11% Disability – 9%

<p>protected classes. Knowing that Rockford has a mix of privately and federally funded programs, which of the protected classes (listed below) do you believe needs more resources and services made available to it, in order to adequately address current needs? CHOOSE THREE (3)</p>	<p>Color – 7% National origin/Home Country- 6% Sex – 4% Protective Order Status – 4% Ancestry – 3% Military – 2% Military Discharge Status – 2% Religion – 1% Sexual Orientation – 0%</p>
<p>When thinking about what our residents understand about their rights and responsibilities, what free education would you like to see available to our Rockford residents? CHOOSE THREE (3)</p>	<p>Homeowner maintenance – 18% The home buying process – 16% Debt reduction – 14% Credit repair – 13% Financial Literacy – 12% Renters' Rights – 10% Homeowner investment protection – 8% Eviction Protection – 5% Estate planning for families – 4%</p>
<p>The Northern Illinois Homeless Coalition has been working as a Built for Zero community, and works with populations to achieve “functional zero” for differing homeless populations. Having already met their benchmarks for veterans and chronically homeless folks, they are now setting goals for youth, singles and families. Knowing this priority, which of these three populations would you want them to prioritize in developing new housing options? CHOOSE ONE (1)</p>	<p>Families – 54% Singles – 25% Youth – 21%</p>
<p>Are there other services you would like to see for the population you choose above? Please write your answer on a sticky note.</p>	<ul style="list-style-type: none"> •Foster Care, youth aging out •Echo the aging out of foster care •Mental health, substance abuse treatment •Financial literacy •Hand on job skills training •Programs for migrants •Childcare, healthy food options, parental monitoring

	<ul style="list-style-type: none"> •Community involvement initiatives, pride and cultural consistency •Supportive housing with 24 hour supervision •Case management for new arrivals •Time and connection together and with your neighbors
When building new housing, what audience would you prioritize? CHOOSE TWO (2)	First-time homebuyers – 25% Families – 22% People with low credit scores – 15% Seniors – 14% People with disabilities – 10% Supportive Housing for Homeless – 9% People using Section 8 Housing Choice Vouchers – 5%
Which of the following community services do you think should be prioritized for our community? CHOOSE TWO (2)	Mental Health Services – 26% Children/Youth Services – 17% Senior Services – 11% Healthcare Services – 9% Financial Crisis Services – 9% Services for People with Disabilities – 8% Services for People with Justice System Experience- 7% Services for victims of domestic violence – 5% Substance Abuse Services – 3% Shelters – 2% Services for Immigrants, Refugees and Non-English Speakers – 2%
Which of the business and job opportunity issues below do you think needs to be prioritized? CHOOSE ONE (1)	Support for Businesses that Serve Community Needs – 37% Increase Access to Small Business Grants or Loans – 24% Job Readiness and Retention – 19% Coaching and Technical Advice for Small Businesses – 10% Commercial Building Rehabilitation – 10%
Of these potential funding categories, which would you say are the top priorities? CHOOSE THREE (3)	Housing Rehabilitation – 23% Housing Development – 20% Community Improvements – streets – 18% Economic Development – 15%

	Supportive funding for non-profits – 12% Community Improvements – blight removal – 8% ADA improvements to Public Buildings – 4%
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Planning Focus Group meetings and listening sessions were as follows:

- 9/12/2024 - Education and Disability Planning Focus Group Meeting
- 9/13/2024 - Health and Mental Health Planning Focus Group Meeting
- 9/18/2024 - Internal Planning Focus Group Meeting
- 9/19/2024 - Social Services Planning Focus Group Meeting
- 9/20/2024 - Internal Planning Focus Group Meeting
- 9/21/2024 - Neighborhood Planning Focus Group Meeting
- 9/24/2024 - Veteran and Senior Services Planning Focus Group Meeting
- 9/26/2024 - Economic Development Listening Session
- 9/27/2024 - Diverse Resident Supports Planning Focus Group Meeting and an Economic Development Listening Session

The organizations that participated and their comments are as follows:

EDUCATION AND DISABILITY FOCUS GROUP

Rock Valley College

Significant lack of accessible, affordable housing; requirements for receiving support prevent access to programs; lack of understanding/education for those seeking accommodations. Barriers “pile on.”

RAMP Center for Independent Living

Majority of clients served do not have physical disability but instead have emotional and intellectual disabilities, creating more barriers to access and a lot of transience. Wait lists for supportive services are years long, so children without services are missing school. Parents lose jobs as a result of children’s needs, putting housing at risk. Repeated trauma increases issues.

Birth to Five Illinois

Regional needs assessment found transportation is a top need; without it, parents cannot hold down a job while also getting children to school when they are a distance from each other. Divergent needs between parents and children create a “multi-level mess.”

Rockford Public School District 205 (RPS205) Family and Community Engagement

Estimates 20% of students do not live with parents resulting in significant instability. Much housing for RPS students is unlivable or families are evicted, while some students are running their households, creating more instability in education. Reliance on community to provide support to families, but competition for funding causes division and those supports are not there like they used to be.

RPS205 Bilingual Spanish Family Support

Housing instability impacts extended family and creates vicarious trauma. Families are unable to take in unhoused family members or else risk bringing stress and trauma into their homes.

National Youth Advocate Program

Support programs (skill building) for youth are insufficient; parents need similar support. Trauma and stress create untenable situations where parents cannot handle the youth and actually want them to return to Juvenile Justice to give parents a break. Children acting as heads of households prevents them from accessing supportive programming and/or attending school. Blight is rampant; housing unavailable for those who need it.

HEALTH AND MENTAL HEALTH FOCUS GROUP**Tommy Corral Memorial Foundation**

Young adults struggling with mental health issues get kicked out of their homes. Rockford's only local shelter is not inclusive for LGBTQ+ folks and feels traumatic to others. Psychologically supportive services are needed for folks to create the mindset necessary to get and stay housed. We need true collaboration between providers across the community.

Stepping Stones

Trying to provide more housing for folks who need a second chance, but zoning regulations create barriers and reduce financial feasibility of building. Resident bias against low income folks inhibits development of affordable housing.

Crisis Co-Response Team/Mobile Integrated Health

Efforts to house homeless folks have not been able to fill the housing insecurity gap, much of which is related to a lack of mental health services available and issues within the system – a failure to address root causes. There is need for an additional shelter in Rockford that is publicly funded and thus subject to regulations which prohibit discrimination.

Rockford Regional Health Council

The psychology of being homeless varies significantly from the psychology of home ownership. Unhoused folks need psychological support.

Rosecrance

Great need for emergency housing for larger families with 6-8 children. Even when hotel vouchers are available, it is merely a band-aid. Local Continuum of Care is collaborating more effectively lately, though it is still a challenge to work with folks who choose to be unhoused.

National Alliance on Mental Illness (NAMI) Northern Illinois

Systemic issues create a vicious cycle that prevents getting people housed; personal challenges exacerbate the issues. Supervised, supportive housing works!

INTERNAL PLANNING FOCUS GROUP MEETING

Mayor's Office of Domestic and Community Violence

One of the major reasons victims stay with their abusers is a lack of crisis housing. Federal requirements to qualify for supportive funds prevent obtaining. Survivor trauma prohibits placement in a regular shelter. Need safe, affordable housing with supportive, holistic services, similar to Mary Parish Center in Nashville.

Health and Human Services Community Services Division

Local housing authorities have razed buildings; now people who must be relocated compete with others in need to find affordable housing. This is a significant segment of our population. Due to such competition for housing, landlords have raised rent and other requirements significantly, creating greater barriers. Need to incentivize students going into mental health fields.

Community and Economic Development Neighborhood Standards/Blight Reduction

Buildings become unsafe and must be condemned, but there is nowhere for those residents to go and some will remain in the unsafe home in awful living conditions. People being released from incarceration are sent here by Department of Corrections, competing for housing and services. Hoarding creates additional challenges. If mental health issues are not addressed, creates a vicious cycle.

Community and Economic Development Neighborhood Division

Local Housing Authority offers 125% of fair market rent in order to get landlords to accept their vouchers, driving up rent in general. Challenge of creating effective systems when City does not have capacity; need an external organization to step up and develop/own certain programming. Even if we were to have a large infusion of cash, it would be needed to fund more supportive services rather than a facility.

Fire Department Mobile Integrated Health

People who need support but do not have a case manager struggle to maintain placement in housing without help until they are able to stand on their own two feet. Also need more mental health follow through. Developmental disability can disqualify people. We also have people being sent to Rockford from Elgin and McHenry mental health facilities but with the shelter full, they end up with nowhere to go. Individual autonomy means many people refuse medication and other mental health support. Even if there were funding for a facility, staff shortage in mental health prevents successful implementation.

Community and Economic Development Zoning

City council can stand in the way of needed developments, so staff needs to work with council members to create understanding.

SOCIAL SERVICES FOCUS GROUP

Northern Illinois Food Bank

Language barriers prevent residents from reaching out for help. Services are not located in the areas in which people most need them.

Winnebago County 17th Judicial Circuit Court Family Violence Coordinating Council

Survivors afraid to leave domestic violence situations because they have nowhere to go. Difficult to access housing with a criminal record, and even survivors often have a criminal history. Situations are always highly complex. People don't trust in systems, but that is how our supports are set up. Some private support, such as from churches, can be conditional or just disappear. The development of life skills is crucial as well as healing from trauma. Money for housing is not enough; need education as well. Supports are needed beyond the traditional 8 to 5.

Remedies Renewing Lives

Survivors staying in shelter much longer than once did (months at a time) due to lack of housing. Language barriers and high numbers of children in families can create barriers even when Remedies finds prospective housing. Evictions are a big issue as well since following legal process to break lease is not timely. Fully supportive transitional housing program does not have near enough capacity. There is reluctance and fear among landlords regarding renting to survivors. Transportation is a significant issue. Trying to get a better job through education can be difficult when it overlaps with current work hours.

Goodwill Industries of Northern Illinois Pathway Home program

So many issues add up to create insurmountable barriers: backgrounds, waitlists, application fees and processes, credit score, evictions, literacy, insufficient documentation, substance/alcohol abuse, mental illness. Returning to same home after incarceration puts people right back in the fray, but they have no other housing options. All of the issues are complex and nuanced. Transportation is especially an issue for nontraditional work hours.

Mile Square LP Johnson Center

Issues with taking medication prevents mental stability; patients unable to remain on path to achieve their goals. Too often run out of options and hit dead ends in pursuit of offering assistance to folks.

Illinois Department of Children and Family Services (DCFS) Resource and Recruitment Services

Spanish speakers often unaware that they have rights as renters. There is inadequate food access, including proximity to grocery stores as well as food prices. There are always waitlists when referring people for service. People lose their benefits due to background checks and abusive partners. Need shelters that can house larger families, especially since the trend is for

families to stay much longer. Even when support programs are offered, people refuse them. It can be scary and dangerous for personnel to go into these homes.

INTERNAL PLANNING FOCUS GROUP 9/20/2024

Family Peace Center

Health and Human Services is overwhelmed with the need for housing placement. Affordable housing is extremely difficult to find. Even when receive financial assistance from the City, finding a place to rent is a challenge, especially with an eviction on their record. People do not know their rights and are taken advantage of. Prairie State Legal is not able to help as much as is needed. Need more transitional housing. Shelters are full; survivors need independent space with direct case management. Relationship and trust building is key. Successful folks are those who have had long-term support – sometimes years. Homelessness prevention is also needed.

Rockford Police Department

Significant need for managed housing units, including for crisis housing and for unhoused individuals who don't want to be housed. Especially important to address the mental health crisis and to connect people to resources. Pets are an important issue! Need housing that accepts them. Mental health facilities can be helpful, but in the past those who have gotten out of one could become even more violent since they were so heavily medicated while in treatment.

LEWIS LEMON NEIGHBORHOOD RESIDENT FOCUS GROUP

Barriers to fair housing often related to criminal record, employment, credit scores. It becomes a vicious cycle. Landlords use intimidation to avoid following processes and do not seem to be held accountable, but people believe they have no choice but to accept poor living conditions. Many live out of state and are not invested in our community. Rules that do not align with people's lifestyles can lead to eviction. Young mothers are at risk, needing housing as well as trusted adult to help raise their children while supporting their continued growth as well. Gun violence/deaths are a constant issue.

LINCOLNWOOD ESTATES NEIGHBORHOOD PLANNING FOCUS GROUP

Childcare is needed in proximity to home or jobs; need availability for all shifts. Strong neighborhood associations should receive funds to connect residents to services through relationship building, including a need for greater re-entry support and fatherhood programs. This would help with the current lack of awareness/communication that prevents residents from connecting to services. More first-time homebuyer and housing rehab programs needed; programs currently offered are too limited, including lack of psychological/emotional accessibility.

VETERAN AND SENIOR SERVICES FOCUS GROUP

Veterans Drop-In Center

Veterans are older than the general population. Vietnam Vets are the ones needing most services right now. Rockford does not have a lot of in-home services for vets, which could help prevent them from going to a facility. There is eviction prevention assistance, but it is only available for those that meet certain criteria. Substance abuse impacts maintaining housing when money goes to addiction instead of rent. People on the street have no options with the shelter full, plus service dogs are not allowed in.

Department of Veteran Affairs (VA)

VA has been able to incentivize landlords to take a chance on vets who are often difficult to house – relationship between VA and landlords helps with communication and finding support before eviction process is begun. More patience and flexibility is needed to house such vets. Hard to find housing with voucher limits on rent. Extremely helpful when vets are offered on-site services and support. Difficult for them to navigate turnover in support positions; they need a trusting relationship in order to access services. Traditionally we dislike “slumlords” but they are ones who will put up with rough behavior and damage caused, so VA relies on them to provide housing for vets who are otherwise unable to be housed. Mental health and behaviors cause many vets to burn bridges with family. Not enough services exist to support such tough cases. Bedbug infestations are also an issue but often unreported due to fear of impact on housing. Money exists to help pay certain deposits, but not pet deposits.

University of Wisconsin Health (UW Health) Home Health Care in Northern Illinois

Significant issue with older housing in Rockford not being ADA accessible, which causes many seniors to be stuck in their homes. Concerns about money prevent people from getting supportive in-home services or moving into a supportive housing environment.

ECONOMIC DEVELOPMENT LISTENING SESSIONS

Accelerating Creatives & Entrepreneurs (ACE)

Need to market support agencies so aspiring entrepreneurs know that agencies exist. 3 D printers are a concern to businesses. Funding needs to be made simple. For the livelihood of Rockford businesses, community members need to have disposable income to spend.

Rock Valley College Small Business Development Center

Provide supports in multiple languages such as Arab, Spanish, English and Swahili and forms such as recordings and videos. Provide funding for long-term programming, lenders speaking multiple languages, and collaborative projects. Access to funding is impactful to the livelihood of Rockford businesses.

Rockford Local Development Corporation

The City promoting the development, redevelopment, and revitalization of vacant & underutilized sites is imperative to succeeding at job creation, retention, and job training goals. Redeveloping can help bring in manufacturers looking to expand with government capital programs. The City needs to coordinate with local partners, state officials and representatives in

Congress to create this network/feed-back loop of enticing redevelopment in vacant sites, improving the curb appeals and perception of Rockford, which will bring in developers, ultimately leading to well paying, union or skilled labor, and more money being spent in local businesses. Currently there are language, education, and financial barriers. Continue consulting, training, and coaching. Continue investing in the children to improve education outcomes and incentivize higher education (whether through trades, apprenticeships, associates degrees, or 4-year college degrees). Invest in more infrastructure projects on the West side of the river to improve the perception of neighborhoods, improve property values, hopefully breaking stigma that keeps restaurants and highest-earners reserved to businesses east of Alpine. Increase capital investment on revolving loan funds, including funds for green energy projects.

Rockford Regional Hispanic Chamber of Commerce

One of the biggest barriers is limited access to mentorship and business guidance, especially for underserved groups like the Latino community, which has steady growth but lacks sufficient resources. Need to provide targeted technical assistance, with a focus on emerging markets. Shift the regional mindset from solely bringing manufacturing to embracing diversification, including the integration of AI and emerging technologies. There is a lack of stable workforce, increase of overhead expenses and lack of funding opportunities for small businesses.

SWIFTT Community

Need workforce development and resources that are easily accessible. Use videos/tutorials of guidelines for services. Funding is a barrier to businesses. Need long-term consistent programming, for all stages of a business.

DIVERSE RESIDENT SUPPORTS FOCUS GROUP

Brooke Road United Methodist Church

Need for mental health care. Barriers to utilizing the shelter, including being banned. Sees lots of multi-generational housing, with challenges that prevent kids from being in school. Tenants need to be educated on their rights.

Rockford Regional Hispanic Chamber of Commerce

Crime and business challenges have a great impact. Latino residents are uncertain of where to turn for help, so they need Latino leaders to act as go-between. And the Latino community does not complain until something has already happened.

Retired Teacher / Community Advocate

Insecure housing and student mobility negatively impact academic success. The City does not seem to be addressing the housing problems, and the community is not calling it out. Underlying issues are not being addressed. Outside investors are a problem. Should talk about cooperative housing and providing support through historic tax credits and such. Why doesn't the City of Rockford want to own housing?

Liam Foundation

Members of the LGBTQ+ community have had to travel elsewhere to get services. They are discriminated against at the local shelter, so getting housing can be humiliating, plus it requires wraparound services. We need crisis and transitional housing, with a shelter that is fully inclusive of folks with disabilities, men with children, families.

Stateline Real Estate LLC

Families can be evicted due to situations they can't control, such as behavior disorders in children for which they have no support. Leases are overwhelming and tenants don't understand everything. Insurance has increased for property owners, so rent has gone up. Low paying jobs don't cover high rents. People do not know that they need to report issues, which can result in damage to building and trigger evictions. Migrants cannot be housed because they cannot be background checked. Mental health issues impact renter stability, but emotional support animals are not easy to take in since animals can cause so much damage. When people have not experienced living better, they do not understand upkeep and can be negligent, but folks on Section 8 cannot be inspected more than every 6 months, so issues can get out of control before they are recognized. Legal constraints prevent meeting the needs of some people; great challenge to balance the needs of the landlord with the needs of the tenants.

House of God Church

Cultural differences can create a gap in understanding, leading to behaviors that are problematic. Education is needed. Residents need additional housing options, and churches can help fill that gap. So many have issues such as break ins for those who live in affordable housing.

Catholic Charities Refugee Resettlement Program

Need landlords who are willing to ready an apartment and hold it without a lease pre-signed, but tenants must sign their own, and often refugees' date of arrival is unpredictable. Some organizations can take on the liability of signing the lease, but Catholic Charities cannot. Refugees may not know how to use things in the home. Others are in shock at having to live on the limited resources they are provided when they lived a better life in their home country. Communication is problematic and prevents them from getting the support they need. Landlords take advantage by charging high rents. Transportation is a significant issue, which impacts employment, which is extremely difficult to obtain as it is. Waiting list for ESL classes at Rock Valley College, and language barriers create more issues.

For a full list of parties that the City consulted with and how the City consulted with them see PR-10 Consultation Table.

Two comment letters were received. The Northwest Illinois Alliance of Realtors and the Government Affairs Director from the Illinois Realtors submitted a letter offering support for various fair housing programs listed in the plan. They also recommended that the City consider increasing housing variety

and accessibility, emphasizing economic development and transportation, reviewing nuisance ordinances to make sure they did not violate fair housing laws, reporting metrics to the community, and collaborating with stakeholders. The second letter came from the Habitat for Humanity Housing Advocacy Group, and they asked that the City work with the County to understand how to prevent homeowners from losing their home in tax lien sales and that fair housing testing be directly funded by CDBG.

All comments received, were considered when developing the Five-Year Consolidated Plan, Annual Action Plan, and Analysis of Impediments to Fair Housing Choice.

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	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Four Public Hearings 9/18/24 (8 attendees), 9/24/24 (16 attendees), 12/5/24 @ noon (3 attendees), and 12/5/24 @ 5:30 pm (14 attendees)	See narrative above.	All comments were accepted and considered.	N/A

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Of the 24 September Public Hearing attendees, 4 (17%) read about the public hearings in the Newspaper.	None	None	N/A

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Social Media and email distribution lists	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Emails were sent to City distribution lists for cross sector partners and persons interested in Economic Development encouraging participation in the Public Hearings and/or completing survey questions. Besides being a News Flash on the City's website, content was available through Instagram and Facebook.	See narrative above.	All comments were accepted and considered.	https://rockfordil.gov/

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Focus Groups and Listening Sessions	Cross Sector Partners	9/12/2024 – 7 attendees 9/13/2024 – 6 attendees 9/18/2024 – 12 attendees 9/19/2024 – 10 attendees 9/20/2024 – 10 attendees (5 adults and 5 youth) 9/21/2024 – 9 attendees 9/24/2024 – 3 attendees 9/27/2024 -5 attendees and 7 attendees	See narrative above.	All comments were accepted and considered.	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

The City of Rockford used the provided HUD Comprehensive Housing Affordability Strategy (CHAS) data to provide statistical data on housing needs, in order to prepare its estimates and projects. The tables in this section have been prepopulated with HUD data sets based on the American Community Survey (ACS) five-year estimates, and the 2020 Census. This data is the most current information available to assess housing needs, homeless needs, special needs, social service needs, economic development needs, etc. In some instances, the City chose to use more accurate or timely data than what had been provided. Additionally, some of the data was slightly incorrect. This being said all tables that have new sourced datasets have the data source and table information provided for them.

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

The City of Rockford defines a property as “standard condition” when the condition of a housing unit meets the City of Rockford’s building code standards necessities: “Local Amendments to 2021 ICC [IPMC] International Property Maintenance Code.” The City defines “substandard condition suitable for rehabilitation” as the condition of a housing unit that fails to meet the City’s building code standards, but the cost to rehabilitate the housing unit up to code standards is less than the fair market value of the housing unit after the rehabilitation work is completed. In addition, the City of Rockford uses the 2021 IPMC to determine what constitutes a code violation. The number of code violations is used to identify deteriorating and deteriorated properties. The prevalence of poorly maintained housing, as well as retail and commercial properties with multiple code violations, define an area as deteriorating or deteriorated. Additional factors that contribute to this definition of “deteriorating” include: multiple vacant and boarded properties, properties with poorly maintained yards and garbage, the presence of rodents and insects due to poor building maintenance and unsanitary conditions, and dilapidated garages and outbuildings. In recent years the City has increased its efforts to address poorly maintained homes and those in substandard condition (at the tipping point) through proactive code enforcement and programs aimed at removing blight and helping low income families deal with deteriorating living conditions. Additionally, the City has spent considerable funds to demolish those homes that could not be saved and thus removing the eyesore as well as the dangerous conditions from the neighborhood. This may allow for infill redevelopment by way of new residential construction in the future.

It should be noted that the City of Rockford is part of the Boone, Dekalb, and Winnebago County Continuum of Care region/program. Data and information for the creation of the homeless needs section was obtained from the Continuum of Care.

Finally, additional needs and more detailed aspirations for the City of Rockford were obtained from input from surveys, interviews, open house events and various social service agencies, housing providers city staff and other sources.

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

Summary of Housing Needs

Demographics	Base Year: 2019	Most Recent Year: 2022	% Change
Population	147,070	148,173	.75%
Households	59,551	61,242	2.8%
Median Income (Household)	\$44,252	\$50,744	14.7%

Table 1 - Housing Needs Assessment Demographics

Data Source:

ACS DP05 Demographic & Housing Estimates, 2019 & 2022, 5-Year estimates (Population)

ACS DP02 Selected Housing Characteristics, 2019 & 2022, 5-year estimates (Households)

ACS S1901 Income in Past 12Mo., 2019 & 2022, 5-year estimate (Median Income)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	11,650	9,310	12,755	6,210	22,095
Small Family Households	3,900	3,175	4,390	2,340	9,570
Large Family Households	1,065	640	1,220	625	1,365
Household contains at least one person 62-74 years of age	1,880	1,685	3,070	1,095	6,190
Household contains at least one-person age 75 or older	1,030	1,845	1,960	760	2,565
Households with one or more children 6 years old or younger	2,745	1,640	1,890	1,130	1,645

Table 2 - Total Households Table

**Data
Source:**

2016-2020 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	175	205	180	115	675	130	30	4	0	164
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	170	25	60	0	255	4	0	35	30	69
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	294	190	170	50	704	100	64	120	145	429
Housing cost burden greater than 50% of income (and none of the above problems)	5,135	895	115	15	6,160	1,350	505	200	55	2,110

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	885	2,740	1,405	65	5,095	630	1,255	1,295	270	3,450
Zero/negative Income (and none of the above problems)	750	0	0	0	750	235	0	0	0	235

Table 3 – Housing Problems Table

Data 2016-2020 CHAS
Source:

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	5,775	1,310	520	180	7,785	1,575	595	355	235	2,760
Having none of four housing problems	2,970	4,285	6,105	2,535	15,895	1,325	3,115	5,765	3,260	13,465
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

Table 4 – Housing Problems 2

Data 2016-2020 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	2,650	1,870	439	4,959	330	400	324	1,054
Large Related	705	175	25	905	175	44	19	238
Elderly	1,150	839	580	2,569	813	990	955	2,758
Other	2,065	990	585	3,640	890	340	205	1,435
Total need by income	6,570	3,874	1,629	12,073	2,208	1,774	1,503	5,485

Table 5 – Cost Burden > 30%

Data 2016-2020 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	0	0	345	345	205	145	0	350
Large Related	0	0	25	25	175	20	0	195
Elderly	830	364	130	1,324	574	240	160	974
Other	0	1,840	335	2,175	495	0	0	495
Total need by income	830	2,204	835	3,869	1,449	405	160	2,014

Table 6 – Cost Burden > 50%

Data 2016-2020 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	415	184	194	35	828	104	34	90	165	393
Multiple, unrelated family households	8	10	25	10	53	0	30	60	10	100

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Other, non-family households	30	25	25	0	80	0	0	0	0	0
Total need by income	453	219	244	45	961	104	64	150	175	493

Table 7– Crowding Information

Data 2016-2020 CHAS
Source:

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

According to the 2022 American Community Survey (ACS) 5-year estimate (S1101) of households and families, there were a total of 61,242 households in 2022 in the City of Rockford. Based on this number of households, 21,312 (34.8%) of all households were single person households living alone. Single person households aged 65 and over comprised 8,880 households or (14.5%) of all households. Based on the 2022 American Community Survey (ACS) 5-year estimate, 30.7% of all households have one or more person 65 years or older, and if it is presumed that as they age in place, additional accommodations and supportive services will be necessary for this portion of the City's population. The City will need to assist in obtaining funding and collaborate with housing service and elderly support agencies to provide programs, activities, and accommodations for its elderly population. Recently the city has been working with developers who in part could construct new age in place type facilities.

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

- **Disabled Population** – A total of 46,081 (32% of the population) individuals have a disability. Of those individuals who have a disability: 12% have a hearing difficulty; 9% have a vision difficulty; 22% have a cognitive difficulty; 28% have an ambulatory difficulty; 10% have a self-care difficulty; and 20% have an independent living difficulty. (Source: 2022 ACS 5-year estimate, S1810)
- **Domestic Violence, dating violence, sexual assault, and stalking** – The following data and information was provided by the Rockford Family Peace Center based on information gathered from the individuals they see and in coordination with their partner organizations and members:
 - 58% make between \$0-\$20,000 annually. 64% of the individuals in that income range either have children or are pregnant with their 1st child
 - 26% of survivors indicated they are unemployed
 - 136 survivors were homeless at the time of intake

- Health and Human Services referrals for housing assistance has been in the top 3 referrals made since the Peace Center opened.
- 34% of survivors disclose experiencing stalking
- 34% of survivors disclose experiencing sexual assault
- Based on previous grant reports, it is estimated that around 75% of survivors indicate multiple forms of victimization
- 53% of survivors screen as high risk of domestic violence related homicide
- To date the Peace Center has served over 2100 adult survivors and their children

Barriers to housing survivors experience (not a comprehensive list):

- Lack of necessary documentation
- Credit history, or lack thereof
- Isolation created by abuser
- Safety and security (building lacks needed security, abuser had located them and they now have to move)
- Previous evictions or foreclosures
- Utility debt
- Criminal background
- Financial abuse
- No available shelter beds
- Family size
- Family composition (for example, having older male children who are unable to stay with them in a homeless shelter)
- Not enough affordable housing
- Moving costs

All of these issues can then be exacerbated if the systems survivors interact with do not take their trauma into consideration when working with them. Separation is the most dangerous time for survivors. When they make the courageous decision to leave they are at the highest risk of serious injury or homicide. Not having options for people to stay forces them to return to or stay in dangerous situations.

What are the most common housing problems?

Currently, the largest housing issue facing the City of Rockford is availability of all types or styles of housing. This has also driven the cost of housing up due to the major increase in demand. By 2032, the city's population is estimated to grow to 152,500-162,700 or 62,000-65,300 households in Rockford. Much of this growth is based on the naturally occurring historical growth trends as well as recent announcements by large employers in the region. Of the 44,024 residential parcels with residential structures built in known years, nearly 13,100 (30%) were built between 1940 and 1959. Conversely, since 2000, only 2,300 structures have been built. There are approximately 496 lots in existing subdivisions and infrastructure in place that could be developed immediately. Also, there are about

1,500 tax-delinquent properties in Rockford. The City of Rockford's combined owner-occupied and renter-occupied vacancy rate is estimated to be 9.9%.

There are several opportunities to improve the housing situation in Rockford. Demand for new housing over the next ten years is analyzed to be between 3,200 and 9,100 new units. Factors contributing to this wide-ranging demand include population growth, job growth, making up for years of underdevelopment of housing stock, and more than 1,000 units demolished over the last 10 years.

Additional barriers may include:

- Lack of affordable housing and continued rental cost rise, often over fair-market rent value
- Although rents are on the rise, the condition of the apartments are not following suit.
- Landlords are hesitant to take on renters with vouchers and landlords are needing more support from collaborative case management team.
- Landlords making criteria more difficult for people to get into units, increasing income amounts needed, more in depth look at credit, etc. They have also increased the amount of "fees" (application, processing, move-in), doubled deposits, (first/last months' rent).
- Additionally, there remains a long wait list to receive vouchers

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

Yes, the elderly, the disabled and low-income individuals/families are affected more so than others population groups within the City. This is due to the lack of available, quality housing, increased housing costs, and aging infrastructure. Generally speaking, the elderly and disabled populations are on fixed and/or limited incomes, making the increasing cost of living expenses a real issue. The lack of housing in general, and the lack of affordable housing that is decent, safe, and sound forces these populations into housing that they cannot afford, or even worse, into housing that is below standard conditions and may not meet the code requirements for occupancy.

Additional populations and households affected

- Single Parent Households
- Individuals and families on fixed income
- Low-to-Moderate income households
- People with no or poor credit or no rental history
- Those with criminal histories or past eviction

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

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

The CoC utilizes short term Homeless Prevention or Shelter Diversion funding to prevent an individual or family from becoming homeless. The CoC is currently working on a CoC-wide policy and procedure for its members to have a coordinated approach for homeless diversion that would be spearheaded through Coordinated Entry. Strategies for homeless diversion would include short term rental assistance for eviction prevention, security deposit funding, and case management for extended assistance and services.

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

Individuals and families of low and extremely low-income struggle to prevent themselves from becoming homeless but are not eligible for many of the services provided by the CoC because they do not fall under their definition of “homeless”. Individuals and families face a dilemma of struggling to prevent their own homelessness or become homeless to receive the benefits of social services. This group of people would likely be eligible for the homeless diversion programs that are being put in place or may benefit from case management to help them apply for subsidized housing, despite there being a waitlist.

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

According to the CoC, it takes approximately 91 days, on average, for a person who has become homeless to be permanently housed again. The Goal for the CoC is 45 days.

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

Not Applicable

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

According to the data shown above by the 2016-2020 CHAS, when looking at cost burdens greater than 30%, with 0- 30% AMI, 54% of renters experience a cost burden, while 40% of home owners experience a cost burden. Additionally, when looking at the housing problems, severe housing problems and instances of crowding in both rental and owned homes, it becomes clear that new and affordable housing stock is desperately needed. The City has made every effort to demolish unsafe structures that do not have a chance at rehabilitation while simultaneously investing, marketing and selling residential properties in need of rehabilitation through various enhancement and investment programs aimed at stabilizing neighborhoods through housing initiatives. The current housing market is the strongest that it has possibly been, and as such, many homes that were once not economically viable to renovate and sell or rent have now become profitable. However, there is also a large increase in the cost to buy a new home and even rental prices are far higher than they were 5 years ago. Due to increased housing costs it has also become an issue with the upkeep and general maintenance of properties as the costs become prohibitive for low-to-moderate income families trying to make ends meet. These tenants are usually living paycheck to paycheck and one large unforeseeable expense could result in someone not being able to afford their current living situation any longer. These tenants are at a high risk of becoming homeless because they are unable to find safe, decent, and sanitary housing, and are ineligible for most homeless social services until they are “officially” homeless. The decision to be homeless may be seen as a risk worth taking in order to get into safe, decent, sanitary, and affordable housing. Low income homeowners are often unable to afford basic repairs to their home which eventually turn into larger structural problems and are then forced to leave their home due to building and health code violations.

The City has focused on removing unsafe housing structures in wards with the oldest housing stock. The number of demolitions, however, has been steadily decreasing because there are less unsafe structures now. At the end of 2023, the city had approximately 496 lots in existing subdivisions that could be built upon immediately. The infrastructure (water, sewer, storm sewer, curb, and gutter) is in place and the lots are shovel-ready for construction. Most of these lots also have gas, electric, and communication facilities readily available. The City is focusing on new residential development within existing subdivisions and vacant lots on the west side.

Other specific housing characteristics that have been linked with instability and an increased risk of homelessness are as follows:

- Landlords increasing the rent without ample notice and sometimes requiring a new deposit.

- Landlords selling the buildings resulting in changes for the tenant, possibly requiring tenants to move out for renovations but allowing them to reapply for significantly higher rent amounts afterwards.
- Increase in mental health issues with fewer services available. Also, as the population ages, an increase in dementia issues that mental health providers will not address.
- Lack of understanding of basic tenant-landlord issues.
- Disasters such as floods or fires; most low-income people do not have insurance and the property owners do not have plans for re-housing the tenants.

Discussion

Not Applicable

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

Introduction

During the planning process for the preparation of the City of Rockford's Five-Year Consolidated Plan, an evaluation and comparison was made to determine if any racial or ethnic group is disproportionately affected by housing problems in the City. For this purpose, a disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in the category as a whole. According to the 2020 Decennial Census of Demographics and Housing Characteristics the total number of white households in the City of Rockford is 36,801 households or 61%; the number of Black or African American households is 12,887 or 21%; the number of American Indian and Alaska Native is 369 or 1%; the number of Asian households is 1,643 or 3%; the number of Native Hawaiian and Other Pacific Islander is 11 or .02%; the number of Some other Race is 4,223 or 7%; and the total of Two or More Races is 4,256 or 7%.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Percent of Total	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,610		1,319	1,025
White	3,455	45%	704	405
Black / African American	3,000	39%	425	420
Asian	105	1%	40	50
American Indian, Alaska Native	4	-	0	0
Pacific Islander	0	0	0	0
Hispanic	899	12%	90	135

Table 8 - Disproportionately Greater Need 0 - 30% AMI

Data Source: 2016-2020 CHAS

*The four housing problems are:

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

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Percent of Total	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,890		2,350	0
White	3,055	52%	1,455	0
Black / African American	1,495	25%	424	0
Asian	165	3%	40	0
American Indian, Alaska Native		-		
	25		0	0
Pacific Islander	0	0	0	0
Hispanic	1,030	17%	380	0

Table 9 - Disproportionally Greater Need 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

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

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Percent of Total	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,590		6,325	0
White	2,695	59%	3,535	0
Black / African American	1,099	24%	1,395	0
Asian	89	2%	150	0
American Indian, Alaska Native		0		
	0		45	0
Pacific Islander	4	-	0	0
Hispanic	685	15%	1,049	0

Table 10 - Disproportionally Greater Need 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

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

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,495	5,420	0
White	1,020	3,440	0
Black / African American	245	800	0
Asian	25	190	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	175	870	0

Table 11 - Disproportionally Greater Need 80 - 100% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

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

Discussion

In review, the total number of white households in the City of Rockford is 36,801 households or 61%; the number of Black or African American households is 12,887 or 21%; the number of American Indian and Alaska Native is 369 or 1%; the number of Asian households is 1,643 or 3%; the number of Native Hawaiian and Other Pacific Islander is 11 or .02%; the number of Some other Race is 4,223 or 7%; and the total of Two or More Races is 4,256 or 7%.

The information above identifies a racial/ethnic group that is disproportionately affected by at least one or more of the four (4) housing problems such as lacks complete kitchen facilities, lacks complete plumbing facilities, more than one person per room, and a measured Cost Burden greater than 30%. Black or African American households at 0-30% of the area median income attribute to 39% of the group. With the total number of Black or African American households in the City representing 21% that is over the 10% threshold to be identified as disproportionately affected by a housing problem listed above.

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

Introduction

During the planning process for the preparation of the City of Rockford's Five-Year Consolidated Plan, an evaluation and comparison was made to determine if any racial or ethnic group is disproportionately affected by severe housing problems in the City. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in category as a whole. The following tables illustrate the disproportionate needs of the City of Rockford if there are any using the latest CHAS data as provided by HUD.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Percent of Total	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,500		2,434	1,025
White	2,940	45%	1,220	405
Black / African American	2,615	40%	810	420
Asian	75	1%	70	50
American Indian, Alaska Native	4	-	0	0
Pacific Islander	0	0	0	0
Hispanic	765	18%	224	135

Table 12 – Severe Housing Problems 0 - 30% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

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

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Percent of Total	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,575		5,665	0
White	1,420	55%	3,090	0
Black / African American	565	22%	1,354	0

Severe Housing Problems*	Has one or more of four housing problems	Percent of Total	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Asian	70	3%	135	0
American Indian, Alaska Native	0	0	25	0
Pacific Islander	0	0	0	0
Hispanic	489	19%	930	0

Table 13 – Severe Housing Problems 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

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

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Percent of Total	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,195		9,720	0
White	669	56%	5,565	0
Black / African American	330	28%	2,159	0
Asian	19	2%	220	0
American Indian, Alaska Native	0	0	45	0
Pacific Islander	0	0	4	0
Hispanic	170	14%	1,560	0

Table 14 – Severe Housing Problems 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

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

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Percent of Total	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	565		6,350	0
White	355	63%	4,100	0
Black / African American	125	22%	920	0
Asian	10	2%	205	0
American Indian, Alaska Native		0		
Pacific Islander	0	0	0	0
Hispanic	70	12%	975	0

Table 15 – Severe Housing Problems 80 - 100% AMI

Data Source: 2016-2020 CHAS

*The four severe housing problems are:

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

Discussion

In review, the total number of occupied housing units according to the 2020 Census of Demographic and Housing Characteristics is 61,190. In detail the total number of white households in the City of Rockford is 36,801 households or 61%; the number of Black or African American households is 12,887 or 21%; the number of American Indian and Alaska Native is 369 or 1%; the number of Asian households is 1,643 or 3%; the number of Native Hawaiian and Other Pacific Islander is 11 or .02%; the number of Some other Race is 4,223 or 7%; and the total of Two or More Races is 4,256 or 7%.

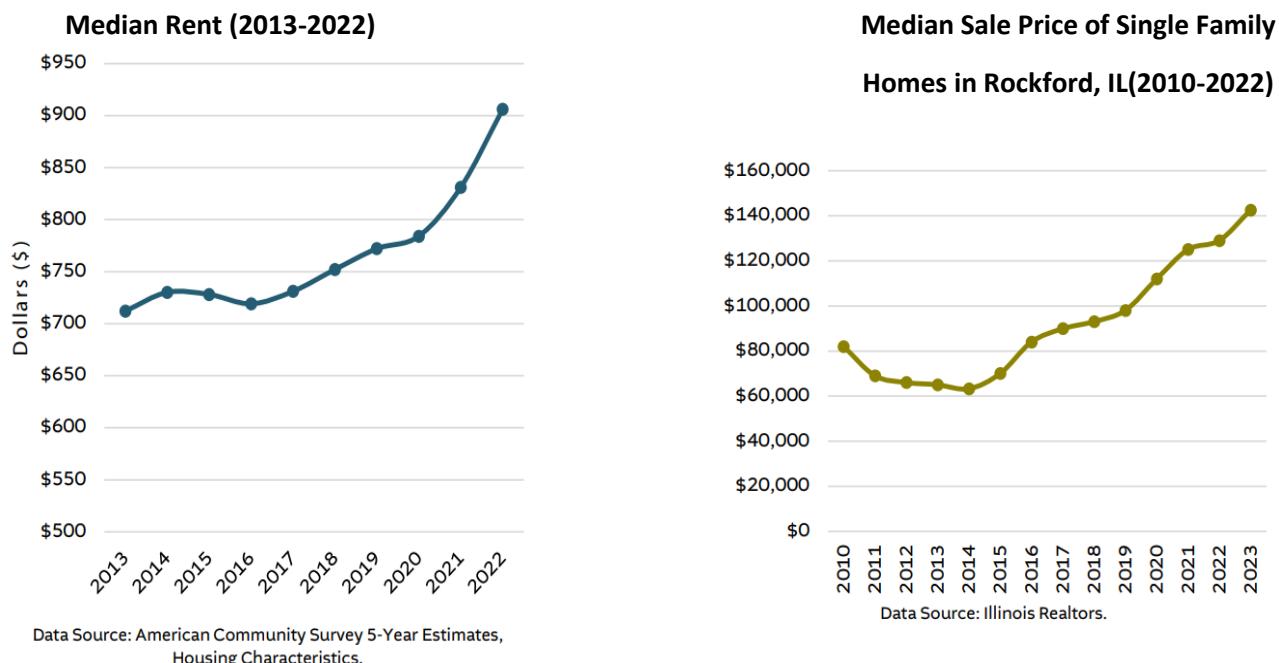
The information above identifies a racial/ethnic group that is disproportionately affected by at least one or more of the four (4) housing problems such as lacks complete kitchen facilities, lacks complete plumbing facilities, more than one person per room, and a measured Cost Burden greater than 30%. Black or African American households at 0-30% of the area median income attribute to 40% of those with a housing problem. With the total number of Black or African American households in the City representing 21% that is over the 10% threshold to be identified as disproportionately affected by a housing problem listed above.

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

Introduction:

During the planning process for the preparation of the City of Rockford's Five-Year Consolidated Plan, an evaluation and comparison was made to determine if any racial or ethnic group is disproportionately affected by housing problems in the City. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in category as a whole.

As of more recently the most pressing housing issue facing the Rockford region is that of quantity. The recent Housing Needs Assessment and Market Study prepared for the City in 2023 and published in 2024 projected that by 2032, the city's population is estimated to grow to 152,500-162,700 or 62,000-65,300 households in Rockford. Much of this growth is based on the naturally occurring historical growth trends as well as recent announcements by large employers in the region. At the time of this study it was determined that the estimated demand for housing in Rockford over the next ten years is between 3,200 and 9,100 additional units.



Housing Cost Burden

Housing Cost Burden	<=30%	% Cost Burden	30-50%	% Cost Burden	>50%	% Cost Burden	No / negative income (not computed)
Jurisdiction as a whole	42,404		9,354		9,223		1,010

Housing Cost Burden	<=30%	% Cost Burden	30-50%	% Cost Burden	>50%	% Cost Burden	No / negative income (not computed)
White	27,950	66%	5,335	57%	4,425	58%	430
Black / African American	7,080	17%	1,975	21%	3,370	37%	345
Asian	1,140	3%	190	2%	295	3%	70
American Indian, Alaska Native	4		10		0		0
Pacific Islander	0		4		4		0
Hispanic	5,490	13%	1,600	17%	870	9%	95
Other (including multiple races, non-Hispanic)	740	2%	240	3%	259	3%	70

Table 16 – Greater Need: Housing Cost Burdens AMI

Data Source: 2016-2020 CHAS Table 9 - Tenure (2) by Race (7) by Housing Cost Burden (4)

Discussion:

While the chart above shows that a good portion of our Cities population is cost overburdened none of the ethnic/racial groups are considered disproportionately in greater need as defined as a group having at least 10 percentage points higher than the percentage of persons as a whole. The percentage of persons as a whole are as follows: the total number of occupied housing units according to the 2020 Census of Demographic and Housing Characteristics is 61,190. In detail the total number of white households in the City of Rockford is 36,801 households or 61%; the number of Black or African American households is 12,887 or 21%; the number of American Indian and Alaska Native is 369 or 1%; the number of Asian households is 1,643 or 3%; the number of Native Hawaiian and Other Pacific Islander is 11 or .02%; the number of Some other Race is 4,223 or 7%; and the total of Two or More Races is 4,256 or 7%.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Yes, as shown on the map the areas colored orange are Census Block Groups where 50% or more of the population is considered to be low-to-moderate income with an overlay that shows the areas that are 51% or greater minority populations combined.

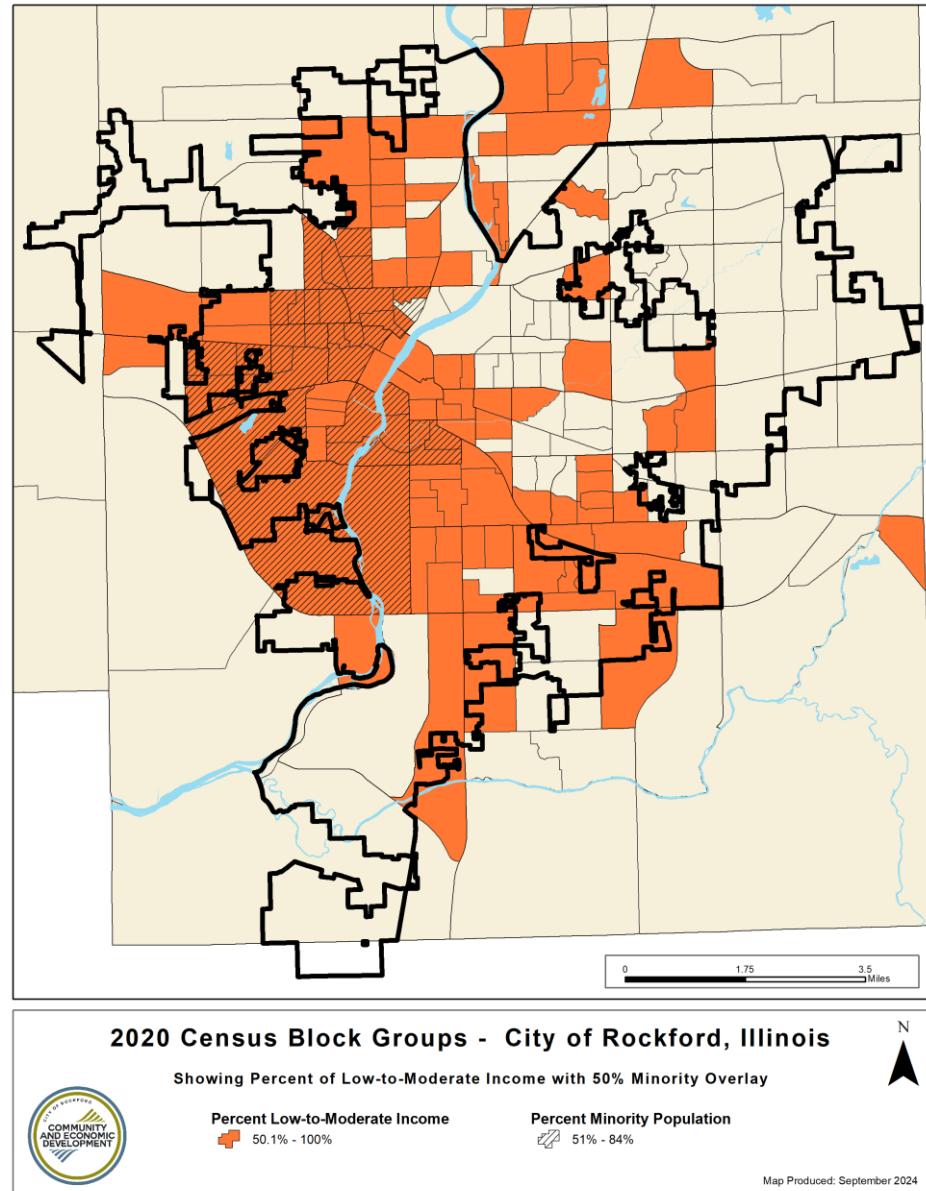
If they have needs not identified above, what are those needs?

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

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

Yes, for the most part, the minority population

increases in composition as you move to the west and/or south of the center of the City of Rockford.



NA-35 Public Housing – 91.205(b)

Introduction

The Rockford Housing Authority is the public housing agency that serves the City of Rockford. The Housing Authority owns and manages 2,527 units of public housing based on the information that was provided at the time.

The Rockford Housing Authority administers 1,508 Section 8 Housing Choice Vouchers and 286 Special Purpose Section 8 Vouchers that are scattered site location.

Totals in Use

	Certificate	Mod-Rehab	Public Housing	Program Type						
				Vouchers	Total	Project-based	Tenant-based	Special Purpose Voucher		
								Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of unit's vouchers in use	0	18	1,308	1,644	169	1,644	92	28	0	

Table 17 - Public Housing by Program Type

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

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Certificate	Mod-Rehab	Public Housing	Program Type						
				Vouchers	Total	Project-based	Tenant-based	Special Purpose Voucher		
								Veterans Affairs Supportive Housing	Family Unification Program	
# Homeless at admission	0	0	388	218	32	132	39			15

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	
# of Elderly Program Participants (>62)	0	1	3345	124	12	112	0	0	0
# of Disabled Families	0	0	609	663	109	430	0	0	0
# of Families requesting accessibility features	0	0	106	1644	51	1,834	0	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0	0
# of DV survivors	0	0	0	0	0	0	0	0	0

Table 18 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	9	432	517	81	360	57	19	0
Black/African American	0	8	1,453	1351	108	1199	35	9	0
Asian	0	0	5	10	5	5	0	0	0
American Indian/Alaska Native	0		1	6	3	3	0	0	0

Race	Certificate	Mod-Rehab	Public Housing	Program Type								
				Vouchers			Total	Project-based	Tenant-based	Special Purpose Voucher		
				Veterans Affairs Supportive Housing	Family Unification Program	Disabled *						
Pacific Islander	0	0	1	3	0	0	0	0	0	0	0	
Other	0	0	0	0	0	0	0	0	0	0	0	

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

Table 19 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type								
				Vouchers			Total	Project-based	Tenant-based	Special Purpose Voucher		
				Veterans Affairs Supportive Housing	Family Unification Program	Disabled *						
Hispanic	0	1	131	73	5	67	1	1	1	0	0	
Not Hispanic	0	17	1,792	1,723	164	1,559	91	27	27	0	0	

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

Table 20 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

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

Public housing tenants and applicants on the waiting list for accessible units face critical challenges that highlight the importance of compliance with Section 504 of the Rehabilitation Act. These individuals, often including seniors and persons with disabilities, require housing that accommodates mobility limitations, sensory impairments, and other physical disabilities. The most pressing needs include units equipped with features such as wheelchair ramps, wider doorways, accessible bathrooms, and lower kitchen counters. Additionally, there is a demand for ground-floor units or buildings with elevators to ensure ease of access. The shortage of accessible units creates significant barriers for these individuals, who are often forced to remain in inadequate or unsafe living conditions while awaiting suitable housing. Ensuring an adequate supply of accessible units is essential to meet the diverse needs of these vulnerable populations and to promote their independence and quality of life.

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

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

The Rockford Housing Authority currently has a significant number of families on its waiting lists for public housing and Section 8 tenant-based rental assistance, reflecting high demand for affordable housing in the area. These families are primarily low-income, including single-parent households, elderly residents, and individuals with disabilities. The most immediate needs of public housing residents and Housing Choice Voucher holders include access to safe and stable housing, assistance with rising utility costs, and support services such as job training and childcare to help them achieve greater self-sufficiency. Additionally, many families are in urgent need of units that are accessible and accommodate larger household sizes.

The specific number and types of families on the wait list was not available at the time of this draft.

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

The population at large generally sees the same problems with rental and owner housing within community. An abundance of properties are in disrepair and landlords are reluctant to make repairs to bring the building up to code; whereas homeowners are unable to afford general repairs which then turn into larger problems in the long run.

Discussion

Not Applicable

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The Northern Illinois Homeless Coalition Continuum of Care (CoC) is the regional organization from the three counties that was formed to address the needs of the homeless in Boone, DeKalb, and Winnebago counties. The CoC consists of 27 agency members. Members of the CoC include representatives from the Rockford Housing Authority, Winnebago County Housing Authority, legal assistance providers, and various adult and youth social services agencies. Case managers work directly with the client to identify the specific needs and challenges facing the homeless. Case managers refer them to the necessary support and housing services. All homeless data is collected and housed in the HMIS case management system. Point in Time (PIT) count total numbers are for the entire CoC. Avg length of time homeless are strictly for the jurisdiction.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	55	0	0	0	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	66	229	0	0	0	110.36
Chronically Homeless Individuals	15	31	0	0	0	0
Chronically Homeless Families	0	2	0	0	0	53.71
Veterans	2	11	0	0	0	72

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Unaccompanied Child	1	22	0	0	0	29.5
Persons with HIV	0	0	1,387	1,008	1,199	87

Table 21 - Homeless Needs Assessment

Data Source Unaccompanied Youth above are ages 18-24, not minors. Persons with HIV data is from 2023 System Performance
Comments: Measures and the # of days above is actually 87.8 nights.

Indicate if the homeless population is: Has No Rural Homeless

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

Additional information or data unavailable at the time of this draft

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	162	37
Black or African American	198	28
Asian	0	1
American Indian or Alaska Native		
Pacific Islander	15	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	45	3
Not Hispanic	334	63

Data Source Totals above are based on 2023 Point In Time Count.
Comments:

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

Based on our current By-Name List of homeless, we currently have thirty-nine (39) families with minor children who are in need of housing assistance. Eleven (11) are unsheltered sleeping in vehicles. Twenty (20) families with children are living in shelters and the remaining eight were placed in hotels by an agency.

In meetings, individuals and those who serve homeless populations expressed a need for services for those who are on the brink of becoming homeless and the need for affordable. In order for individuals and families to receive services from the CoC, they must be verified as literally homeless. There are many families and individuals living in unsafe or “precariously housed” do not meet HUD’s definition of homelessness so agencies try to divert them to other homeless prevention or shelter diversion programs when available.

There are an estimated 2,400 children that are considered homeless within the Rockford School District (RPS205). However, children are usually staying with other family members or with friends and are “couch surfing” – they are still sheltered but not at their parents’ address. RPS205 defines homelessness in its student population as someone who is at imminent risk of being homeless as well. This is because it affects what school they attend or if they attend school at all. And if they are staying at various places it is hard to keep track of that student and what school they should be attending.

Based on current By-Name List data, there are currently twenty-four (24) homeless youth in our community. These are youth ages 16-24 who are not with parents. Some are singles (or part of a couple) while others have children of their own. Of these youth, four are currently unsheltered, thirteen (13) are in emergency shelter, and seven (7) currently have lost contact and we are looking for them. Eighteen of these youth are single while the remaining six have children.

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

A total of 486 persons experienced homelessness according to the Point in Time Counts for 2024. Of those households, 325 were in emergency shelter, 152 were in transitional shelter, and 9 were unsheltered. These numbers are for the entire CoC and cover all of Winnebago, Boone, and DeKalb counties.

On our current By-Name List for Winnebago County, there are currently 252 persons experiencing homelessness, this is inclusive of youth 16-24, single adults (or adult only households), families w/minor children, chronically homeless and Veterans.

Of the 252 persons, 95 are in emergency shelters, 89 are unsheltered, 4 are unsafe/fleeing from Domestic Violence, and 15 are in hotels paid by agency. Forty-nine households are currently in “other” status which means they are just left the shelter or hotel situation or have not been seen on outreach

for over 30 days so staff is working to determine their locations and if they are still homeless or may have move to "at-risk" or housed statuses.

Of the 252 persons, chronic homeless make up 1.6%, veterans are 3.9%, youth are 9.5%, families are 15.5%, and single adults make up 69.5% of the homeless population.

Of the 252 persons experiencing homelessness, 46.4% are White, 48.8% are Black/African American, 1.2% are Asian, 2.05% are Multiple Races, and 1.6% were unknown/not reported. 10.7% reported being Hispanic.

Of the 252 persons experiencing homelessness, 50.8% identified as female, 48.8% identified as male, and 0.4% identified as non-binary.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

In the 2024 Point in Time count, the City identified a total of 486 people in CoC. Of those 486, those in emergency shelter accounted for 325, transitional housing residents were 152, and only 9 were unsheltered. The number for unsheltered seemed very low this year, however, the majority of the individuals who are usually counted as unsheltered were inside at an emergency warming center on the night of the PIT. In general, for the past several years, the unsheltered number has generally averaged about 55 people at a given time but the City has seen it begin to increase during the mid to latter months of 2024, approaching 90 unsheltered individuals amongst those homeless.

For those experiencing unsheltered homelessness, the City sees it as a mix of persons who have addiction or mental health issues which makes it difficult to access the shelter services, convictions for sex offenses or arson which excludes them from going to the shelter, they belong to the LGBTQ+ community and do not feel comfortable at shelters or they are part of a couple, or have a pet that they do not want to separate from. Additionally, in 2024, staffing has been an issue for shelters. Reduced staff has meant reduced capacity, meaning most shelters have been at or close to capacity for a majority of the year, causing the unsheltered number to go up. Of the people on the current By-Name List of the homeless, 29% are over the age of 50 (sheltered & unsheltered).

In addition to the aging homeless populations there has been an uptick in the transient homeless population and consists mostly of individuals who were released from the Department of Corrections or a variety of mental health institutions.

Discussion:

The City of Rockford has reached functional zero for Veteran and Chronic Homelessness. Challenges remain in addressing the gap in services for individuals, families, and youth who do not meet the definition of homeless but are on the verge of becoming homeless. The CoC has set aggressive goals to meet the needs of these populations, and those goals are outlined in the Homelessness Strategy (SP-60).

NA-45 Non-Homeless Special Needs Assessment - 91.205 (bid)

Introduction:

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

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

Describe the characteristics of special needs populations in your community:

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

The special needs population in the City of Rockford have a broad range of needs based on their characteristics. This is no different than the City's population at large. The main concern that the Health and Human Services Department has for the special need's population is the increased risk of becoming homeless and the implications and health/social risks this has. This is due to many factors, which include reliance on others for their care, fixed or sometimes no income, alcohol and drug abuse, domestic violence, age, negative health and well-being factors, etc.

The elderly population as defined by the Census is any individual aged 65 or older. According to the Census 2020 5-year estimate there were 25,639 elderly residents within the City which accounts for 17.3% of the total population. Of this population 70% are in owner occupied housing with 30% are renters.

“Frail Elderly” are those persons who are elderly and have a form of disability, ranging from a hearing loss, vision difficulty, cognitive difficulty, ambulatory problems, and lack of self-help skills. A total of 46,081 (32% of the population) individuals have a disability. Of those individuals who have a disability: 12% have a hearing difficulty; 9% have a vision difficulty; 22% have a cognitive difficulty; 28% have an ambulatory difficulty; 10% have a self-care difficulty; and 20% have an independent living difficulty.

Persons with mental, physical and developmental disabilities make up a decent portion of the total population in the City of Rockford. In total there are 44,589 persons that are classified as having a disability of some type for all age groups or a total of 31%. It is important to note that individuals might be counted more than once if they have more than one disability. Persons with mental, physical and developmental disabilities sometimes lack the capacity to care for themselves and rely on a caretaker to assist them on a daily basis. More often than not, the caretaker is a parent. If the child outlives the parent who has provided their care all their lives, other arrangements must be made to see to their continued care. This group can include all ages, races, and ethnicities.

Disability by Type (all Ages)	Total	Percent of Population
With a hearing difficulty	5,722	4.0%
With a vision difficulty	4,268	2.9%
With a cognitive difficulty	9,466	7.0%
With an ambulatory difficulty	12,412	9.2%
With a self-care difficulty	4,395	3.3%
With an independent living difficulty	8,326	3.3%

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

There is no data available at the metropolitan or city level. However, Rockford is fully within Winnebago County. According to the Illinois Department of Public Health in Winnebago County there are 163 cumulative cases diagnosed since 2016, and 8 cases diagnosed as of 2/28/2023. This equates to a diagnosis rate of 7.79 from 2016-2023. 2016-2023 HIV Diagnosis Rate = Diagnosed cases (January 1, 2016- February 28, 2023)/Population*100,000 (Census July 1, 2020 population estimates were used); rates were annualized.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

Rental assistance is funded with resources other than HOME. Should the City decide to use HOME funds to fund TBRA and want to establish a preference for persons with a specific category of disabilities, City staff will complete a substantial amendment ensuring that the 24 CFR Part 92.209(c)(s)(ii) requirements are met.

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

Describe the jurisdiction's need for Public Facilities:

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

- Public facilities, such as parks, playgrounds, recreational areas, and trails need to be improved and upgraded to promote alternative forms of transportation and healthy lifestyles.
- Flood mitigation on roadways and neighborhoods that see high water and damage from creeks overflowing;
- Infrastructure improvements to bike trails, shared-use paths, roads, and various transportation facilities throughout the City;
- Improvements and reconstruction of sidewalks, including ADA curb cuts;
- Improved access to public transit; and
- Access to affordable grocery stores and healthy food options,

How were these needs determined?

The needs for public facilities were determined through various sources, such as: housing needs survey; agency needs surveys; interviews with City staff, City of Rockford Department of Community and Economic Development, Rockford Housing Authority, and other City agencies; and public hearing comments on needs. Additionally, the 2040 City of Rockford Comprehensive Plan and the City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032.

Describe the jurisdiction's need for Public Improvements:

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

- The City should work to improve and upgrade its storm water management system and flood mitigation infrastructure.
- The City should work towards reconstructing and improving the local roads, curbs, and sidewalks that are in the most need of repair, or part of a larger development or construction project.
- The City should provide additional handicap accessibility at intersections, public buildings, as well as community and public facilities; and enforce the ADA requirements through the Strategic Review Team and the code of ordinances.
- The City needs to improve its parks and playground equipment to meet the demand of neighborhoods and city center.

- The City needs to continue its public improvements activities through the administration of the Capital Improvement Program (CIP).
- The City needs to continue to develop its bike and walking trails.

How were these needs determined?

The needs for the City of Rockford's public improvements were determined through various means. The following sources were used: housing needs survey; agency needs surveys; interviews with City staff, City of Rockford Department of Community and Economic Development, Public Works and Engineering, Rockford Housing Authority, and other City agencies; and public hearing comments on needs. Additionally, the 2040 City of Rockford Comprehensive Plan and the City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032. Additionally, the elected Aldermen have a direct say in how public infrastructure funding is allocated, as well as, how it is used in the Ward they represent.

Describe the jurisdiction's need for Public Services:

The City of Rockford provides public safety and other public services to its residents. The following are the City's needs for public services (not fully inclusive):

- The City needs to continue to provide fire protection to its residents.
- The City needs to provide fair housing education to its citizens as it relates to landlord responsibilities.
- The City needs to continue to provide its high level of public safety to its residents, especially survivors of domestic violence.
- The City needs to continue to provide training to individuals on the use of Narcan during drug overdoses and support the establishment and efforts of drug and alcohol treatment centers.
- The City needs to provide neighborhood policing in areas with high levels of crime.
- The City needs to continue to conduct lethality assessments to protect those who are survivors of domestic abuse and violence.
- The City needs to continue to support programs that assist survivors of domestic violence and abuse.
- The City needs to continue its code enforcement efforts to ensure the health and safety of its residents.
- The City needs to continue to provide emergency medical services to its residents in a fair and equitable manner.
- The City needs to support, encourage, and affirmatively further fair housing throughout its neighborhoods to prohibit discrimination in housing based on certain criteria.

- The City needs to continue to support housing counseling services for low- and moderate-income households in the City
- The City needs to continue to support programs that serve the elderly and frail elderly residents of the City of Rockford.
- The City needs to continue to support programs that assist the homeless population in the City.
- The City needs to continue to support programs that assist youth through afterschool, education, and recreational programs.
- The City needs to continue to support programs that assist youth who are homeless through afterschool, education, and recreational programs.
- The City needs to continue to support food programs for low- and moderate-income individuals and families in the City.
- The City needs to continue to support microenterprise programs through technical assistance, advice, and business support services.
- The City needs to continue to administer the Business First program to assist business development and for new and first-time business owners.
- The City needs to continue to support its job training programs for youth, unemployed, and underemployed.
- The City needs to create programming or drop in services for the elderly population.
- The City needs to continue its homelessness housing programs as part of the Continuum of Care, CoC.

How were these needs determined?

The needs for the City of Rockford public facilities were determined through various means. The following sources were used: housing needs survey; agency needs surveys; interviews with City staff, City of Rockford Department of Community and Economic Development, Public Works and Engineering, Rockford Housing Authority, and other City agencies; and public hearing comments on needs. Additionally, the 2040 City of Rockford Comprehensive Plan and the City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032 were used to determine these needs based off the goals, objectives and implementation strategies of both. Additionally, our elected Alderman have a direct say in how some public infrastructure funding is allocated as well as how it's used in the ward in which they represent.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

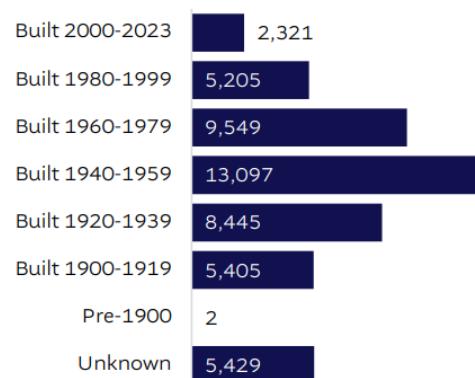
By 2032, the city's population is estimated to grow to 152,500-162,700 or 62,000-65,300 households in Rockford. Much of this growth is based on the naturally occurring historical growth trends as well as recent announcements by large employers in the region. Of the 44,024 residential parcels with residential structures built in known years, nearly 13,100 (30%) were built between 1940 and 1959. Conversely, since 2000, only 2,300 structures have been built. There are approximately 496 vacant lots in existing subdivisions and infrastructure that could be developed immediately. Also, there are approximately 1,500 tax-delinquent properties in Rockford. The City of Rockford's combined owner-occupied and renter-occupied vacancy rate is estimated to be 9.9%. Redevelopment Resources (Housing Study Consultant) recommends an owner-occupancy vacancy rate of 1.5-2% and a rental vacancy rate of 3.5-6% for a combined vacancy rate of 5-8% based on best practices and household growth projections.

Figure 3. Residential Properties by Use Type

Vacant Residential Land	3,217
Condominium (Residential)	2,437
Comm Res (6+units)-Imp	577
Six Family Residence	81
Five Family Residence	40
Four Family Residence	748
Three Family Residence	193
Two Family Residence	3,300
Single Family Residence	38,860

Source: City of Rockford.

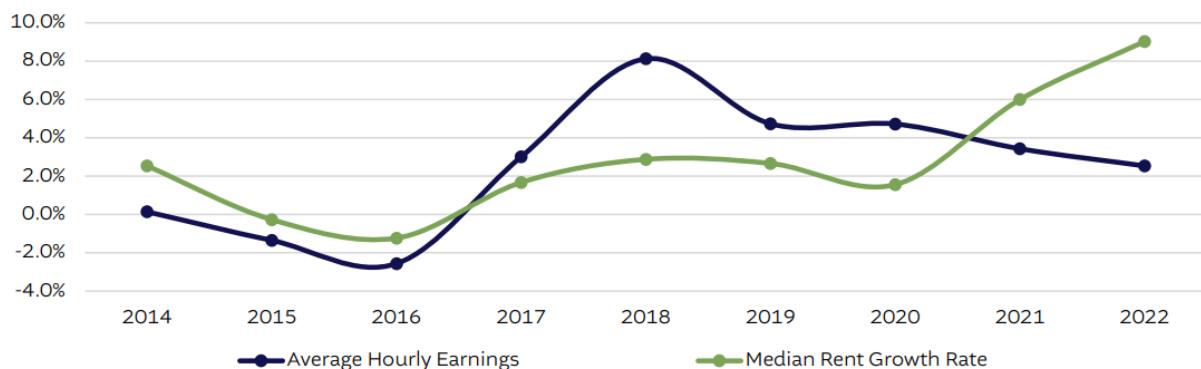
Figure 4. Age of Housing Stock by Year Built



Data Note: The chart is in 20-year increments with the exception of the top bar, which is 24. Source: City of Rockford.

The median price in 2023 (\$142,500) has more than doubled the median sales price from 2014 (\$65,000). Since 2013, the median rent in Rockford has risen 27.2% while average hourly wages of private sector employees have only risen 24.7%. Based on the data scraped from Apartments.com, of the 3,636 units in properties listed on the website, only 2.3% are available.

Figure 5. Growth Rate Comparison of Median Rent and Average Hourly Earnings (2014-2022)



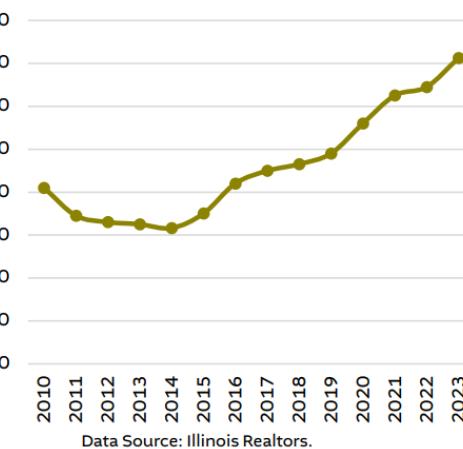
Data Source: U.S. Bureau of Labor Statistics, State and Area Employment, Hours, and Earnings, Not Seasonally Adjusted, Total Private; American Community Survey 5-Year Estimates, Housing Characteristics; Redevelopment Resources.

There are several opportunities to improve the housing situation in Rockford. Demand for new housing over the next ten years is analyzed to be between 3,200 and 9,100 new units. Factors contributing to this wide-ranging demand include population growth, job growth, making up for years of underdevelopment of housing stock, and more than 1,000 units demolished over the last 10 years. At the end of 2023, the city had approximately 496 lots in existing subdivisions that could be built upon immediately. The infrastructure (water, sewer, storm sewer, curb, and gutter) is in place and the lots are shovel-ready for construction. Most of these lots also have gas, electric, and communication facilities readily available.

The median number of single-family home sales per year since 2010 is 1,946. Home sales skyrocketed to 2,275 in 2021 but have since slowed down to levels not seen since 2012. The median sales prices declined during the Great Recession to their lowest point in 2014 (\$63,250). The median price in 2023 (\$142,500) has more than doubled the median sales price in 2014 (\$65,000).

The current housing market in the City of Rockford, and surrounding region, is a sellers' market. This is very evident based on the low available stock for sale and rent, as well as the fact that home prices have increased so substantially in such a short amount of time. In fact, in April 2024 the Wall Street Journal named Rockford the hottest housing market in the Country.

Figure 37. Median Sale Price of Single Family Homes in Rockford, IL (2010-2022)



Data Source: Illinois Realtors.

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

Introduction

According to 2022 American Community Survey data there were a total of just under 68,000 housing units within the City of Rockford. However, this does not mean that all units where occupied. This could be to various reasons such as it is currently being sold, or marketed to renters, it is currently being rehabbed, or the unit is uninhabitable due to various conditions. Of these properties approximately 3,200 are considered to be a vacant lot with no structure currently. Of the 67,890 identified housing units in the City 61,242 are occupied while 6,648 are vacant. This means that the percent of occupied housing units is just over 90% of the total available units that are livable. The majority of owner-occupied units are 3 or more bedrooms which is a total of 74% of all the units combined. However, the majority of renter-occupied housing units are only 2 bedrooms totaling 41% of all total renter-occupied housing units. This is a big difference when comparing the two. This could be partially attributed to family size and that married couples with children need more space and bedrooms to raise a family. The data for renters is also more evenly distributed between the number of bedrooms per unit.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	40,797	60.1%
1-unit, attached structure	3,057	4.6%
2-4 units	11,947	17.6%
5-19 units	6,382	9.4%
20 or more units	5,357	7.9%
Mobile Home, boat, RV, van, etc.	341	.5%
Total	67,890	100%

Table 1 – Residential Properties by Unit Number

Data Source: ACS DP04, 2022 – 5Year Estimate

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	67	0%	1,492	5.3%
1 bedroom	690	3%	6,874	24.5%
2 bedrooms	8,013	23%	11,621	41.4%
3 or more bedrooms	24,371	74%	8,114	28.9%
Total	33,141	100%	28,101	100%

Table 2 – Unit Size by Tenure

Data Source: ACS B25042, 2022 – 5-year estimate

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

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

Public Housing

Park Terrace 98
North Main Manor 97
Olesen Plaza 96
Jane Addams Parks Apartments 94
Jane Addams Villa 92
Blackhawk Courts 84
Summit Green 96
Orton Keyes Courts 7

Section 8 Housing – 1,508

Special Purpose Section 8 Vouchers (Scattered Sites) - 286

Data on income levels and the types of families was not available at the time of this draft.

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

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

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

No. There is an insufficient supply of housing units across all structure types within the City of Rockford and the region as a whole. Of the 44,024 residential parcels with residential structures built in known years, nearly 13,100 (30%) were built between 1940 and 1959. Conversely, since 2000, only 2,300 structures have been built. There are approximately 496 vacant lots in existing subdivisions with infrastructure in place that could be developed immediately.

According to surveys and public participation opportunities the public's opinion calls for existing houses to be restored and any new houses to be built as "infill" or around existing houses, or within existing subdivisions that have infrastructure but construction was paused.

According to the City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032 the current estimated demand for housing in Rockford over the next ten years is 3,200 – 9,100 units by the year 2033.

Describe the need for specific types of housing:

A large portion of the City of Rockford, especially to the west and south, are classified as being low-to-moderate income Census Block Groups according to the most recent data provided by HUD for years 2016-2020 ACS. Additionally, as outlined in the City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032 there is a great need for additional housing units. Household size (number of people living per household) has also grown at a faster rate than the construction of housing units to accommodate this. Also, the region is expected to add an additional 3,400 new jobs in the next few years as businesses expand and relocate. While the City wouldn't expect all new employees to live in Rockford, as the economic hub of the region, it is expected that a large share of them will. The housing demand is estimated to be even higher to allow adequate supply to meet the needs of the new employees to the region.

Therefore, all things considered, the estimated demand for housing in Rockford over the next ten years is 3,200 – 9,100 units by 2033.

The low inventory of available homes to buy and rent has subsequently increased the home sale price and rent price to an extent that we've never seen here before. This is especially burdensome to those who

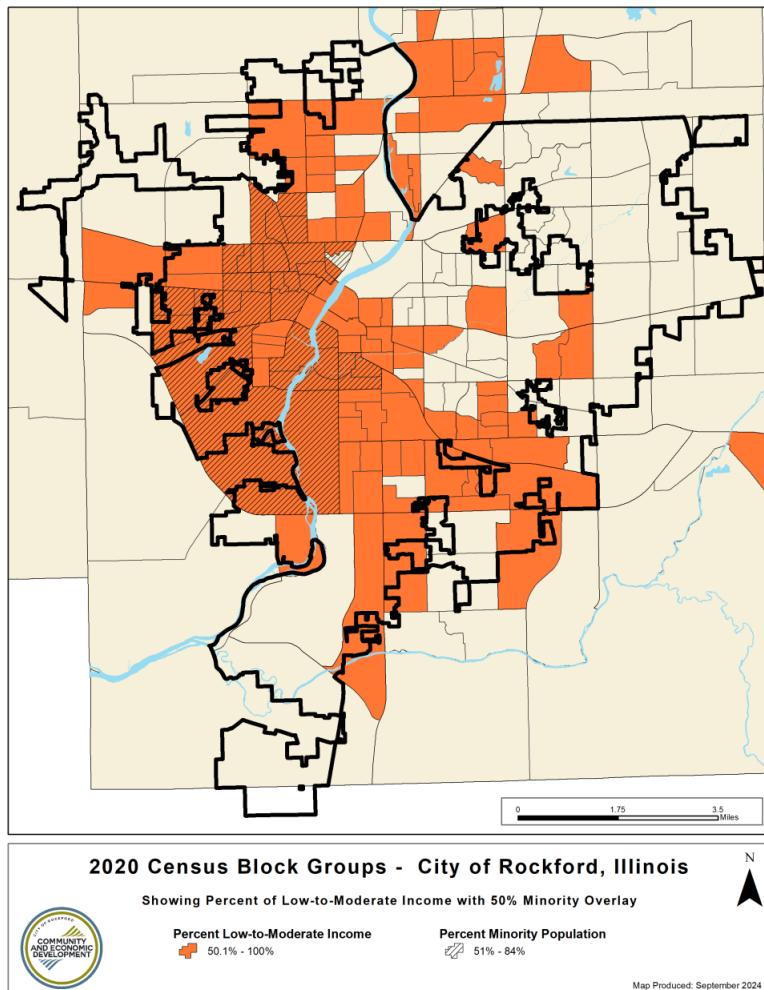


Figure 4. Age of Housing Stock by Year Built



Data Note: The chart is in 20-year increments with the exception of the top bar, which is 24. Source: City of Rockford.

are low-to-moderate income, disabled, elderly, physically disabled, single parent households, and other disadvantage sectors of the population.

Based on the current age of the housing stock new residential development is need of all types and sizes.

According to a recent article by Rockford WTVR news (October 31, 2024), Inventory in the Rockford market rose 23.5% in September 2024 over the prior year, the largest year-over-year increase in 16 years. This recent data points to good news for home buyers and renters alike.

Discussion

Not Applicable

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

Introduction

Housing affordability is a relative term that refers to the cost of housing in relation to a household's income. The U.S. Department of Housing and Urban Development (HUD) defines affordable housing as a dwelling where the occupant pays no more than 30% of their gross income for housing costs, including utilities. This 30% threshold is intended to ensure that households have enough money left over to pay for other costs.

However, the definition of housing affordability can be complex and vary by location. For example, some more sophisticated measures of housing affordability consider are:

- How much non-housing expenditures are limited by how much is left after paying for housing
- Whether to distinguish between "purchase affordability" and "repayment affordability"

Factors that can affect housing affordability include: Employment rates, Real household incomes, Interest rates, Availability of mortgages, and Levels of confidence in the economy and housing market.

This affects both homeowners and renters alike. For renters if a landlord does not pay his mortgage this could result in a foreclosure and subsequently an eviction to the renter who is not at fault but adversely affected.

Cost of Housing

	Base Year: 2019	Year 2022	Year 2023	% Change from 2019 - 2023
Median Home Value	\$91,600	\$114,100	\$139,200	52%
Median Contract Rent	\$618	\$720	\$774	25.2%

Table 3 – Cost of Housing

Data Source: B25077: Median Value (Dollars), 2022 1 -year estimate= \$133,000 – 5 year= \$114,100

Median Home Value B25077: Median Value (Dollars), 2019 1 -year estimate= \$98,900 – 5 year= \$91,600

Median Contract Rent B25058: Median Contract Rent (Dollars), 2022 1 -year estimate= \$728 – 5 year= \$720

B25058: Median Contract Rent (Dollars), 2019 1 -year estimate= \$662 – 5 year= \$618

Rent Paid – Year 2022	Number of Units	%
Less than \$500	4,669	17.3%
\$500-999	16,676	63%
\$1,000-1,499	4,306	16%
\$1,500-1,999	547	2%
\$2,000 or more	480	1.7%
Total	26,978	100.0%

Table 5 - Rent Paid

Data Source: B25056 Contract Rent, 2022 - 5Year Estimate

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$699	\$785	\$1,031	\$1,380	\$1,423
High HOME Rent	\$699	\$785	\$1031	\$1380	\$1423
Low HOME Rent	\$699	\$785	\$1001	\$1157	\$1291

Table 5 – Monthly Rent

Data Source: Fair Market Rent FY2024 Fair Market Rent Documentation System (MSA) 2024
High & Low HOME Rent – HUD Exchange HOME Rent Limits _2024

Is there sufficient housing for households at all income levels?

No. There is an insufficient supply of housing units across all structure types within the City of Rockford and the region as a whole. Of the 44,024 residential parcels with residential structures built in known years, nearly 13,100 (30%) were built between 1940 and 1959. Conversely, since 2000, only 2,300 structures have been built. There are approximately 496 vacant lots in existing subdivisions with infrastructure in place that could be developed immediately.

According to surveys and public participation opportunities the public's opinion calls for existing houses to be restored and any new houses to be built as "infill" or around existing houses, or within existing subdivisions that have infrastructure, but construction was paused.

According to the City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032 the current estimated demand for housing in Rockford over the next ten years is 3,200 – 9,100 units by the year 2033.

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

All signs and data point to continued rising home values and rents. As new homes are constructed it may begin to level out the rising costs that affect all income levels.

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

HOME rents (Low and High), as compared to the Fair Market Rent values for an efficiency unit, 1-bedroom, 2-bedroom, 3-bedroom, and 4-bedroom, are in align with one another. At no time does the High HOME rent value supersede that of the Fair Market Rent value for each category. The data shows that Rent on the high end is at pace to exceed that of the Fair Market Rent Value. This may be averted if additional housing units are constructed at an increased rate over the next couple years.

Discussion

Although according to HUD data the cost for housing is considered fair for the Rockford region. The rapid increase in rent as created a situation where many low-moderate income level households are now overburdened and extremely overburdened by the rising costs of living. Over just a few shorts years, the costs of rent as increased by over 50%. The City, through code enforcement and rehabilitation programs, has made great strides in improving the overall supply of sufficient, safe, and decent housing for the area. However, much work still needs to happen.

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

Introduction

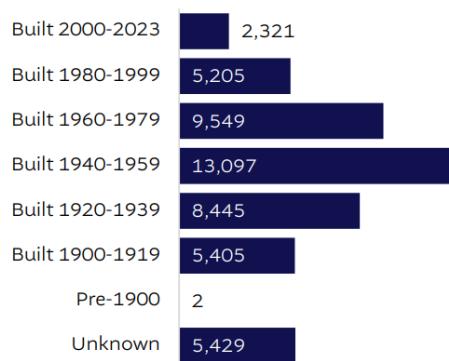
The City of Rockford is currently restricted to the powers enabled by the state legislation. If residents desired greater flexibility and local control to ensure decent, safe, and sanitary living conditions, the best way to achieve this would be to become a home-rule community. Home-rule communities have greater flexibility to abate nuisances and civil disturbances. Other benefits include options to implement revenue policies that lessen reliance on property taxes.

As indicated by the chart to the right, much of the City of Rockford's housing stock is severely ageing. Of the data available 61% of all homes were built before 1960, 83% were built before 1980, and 95% were built after the year 2000. From 2000-2023 a total of 2,321 new residential structures where built.

It is important to note that homes built prior to 1980 have a high potential to obtain lead-based paint hazards unless it has already been mitigated professionally. In the 2021 Annual Illinois Lead Program Report for the Rockford Region (Jo Daviess, Stephenson, Winnebago, Boone, Carroll, Ogle, Dekalb, Whiteside, and Lee County) a total of 9,863 children tested were tested, and of the tested there were confirmed $BLL \geq 5 \mu\text{g}/\text{dL}$: 242 $BLL \geq 3.5 \mu\text{g}/\text{dL}$: 371.

The City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032 also surveyed 350 Rockford residents and 144 of them provided additional feedback regarding why they chose "no" to the acceptability of current housing options. These residents expressed frustration over high costs, limited options, and deteriorating living conditions. Many households struggle to find homes they can afford to rent or purchase, citing soaring prices, excessive taxes, and stringent income qualifications for assistance programs as barriers to entry into the market. Accessibility is another issue, particularly for individuals with disabilities, as few units accommodate their needs. Moreover, aging homes in need of repair or replacement, coupled with neglect from landlords, exacerbate the problem. The perceived lack of affordable housing options contributes to substandard living conditions and neighborhood decline. Despite efforts to address these challenges, such as advocating for more accessible housing and preserving historic homes, many residents continue to face barriers to safe, affordable housing, including limited inventory, high rental standards, and inadequate enforcement of property maintenance. Frustration with the housing market is evident among some, who cite challenges in finding suitable housing within budget constraints or encountering discriminatory rental practices. Despite these challenges, some individuals mention their intention to stay in their current homes, citing reasons such as ownership, affordability, or a lack of desirable alternatives in the market. Overall, the responses underscore the complexity of housing issues in Rockford, reflecting a range of concerns and priorities among its residents.

Figure 4. Age of Housing Stock by Year Built



Data Note: The chart is in 20-year increments with the exception of the top bar, which is 24. Source: City of Rockford.

Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

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

- **Standard Condition** – when the condition of a housing unit meets the City of Rockford's building code standards necessities: "Local Amendments to 2021 ICC [IPMC] International Property Maintenance Code."
- **"Substandard Condition"** - Does not meet code standards, or contains one of the selected housing conditions.
- **"Substandard Condition Suitable for Rehabilitation"** - The amount of work required to bring the unit up to minimum code standard, and the existing debt on the property, together are less than the fair market value of the property.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	6,261	18.9%	13,047	46.4%
With two selected Conditions	155	.5%	684	2.4%
With three selected Conditions	79	.2%	4	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	26,646	80.4%	14,370	51.1%
Total	33,141	100%	28,101	100%

Table 6 - Condition of Units

Data Source: ACS B25123 Tenure by Selected Physical & Financial Conditions 2022 5 year

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	2,323	7%	1,939	6.9%
1980-1999	5,365	16.2%	5,972	21.3%
1960-1979	8,728	26.3%	8,576	30.5%
Before 1960	16,725	50.5%	11,614	41.3%
Total	33,141	100%	28,101	100%

Table 7 – Year Unit Built

Data Source: ACS S2504 (Occupied Housing Units by Year Built) 2020

Risk of Lead-Based Paint Hazard

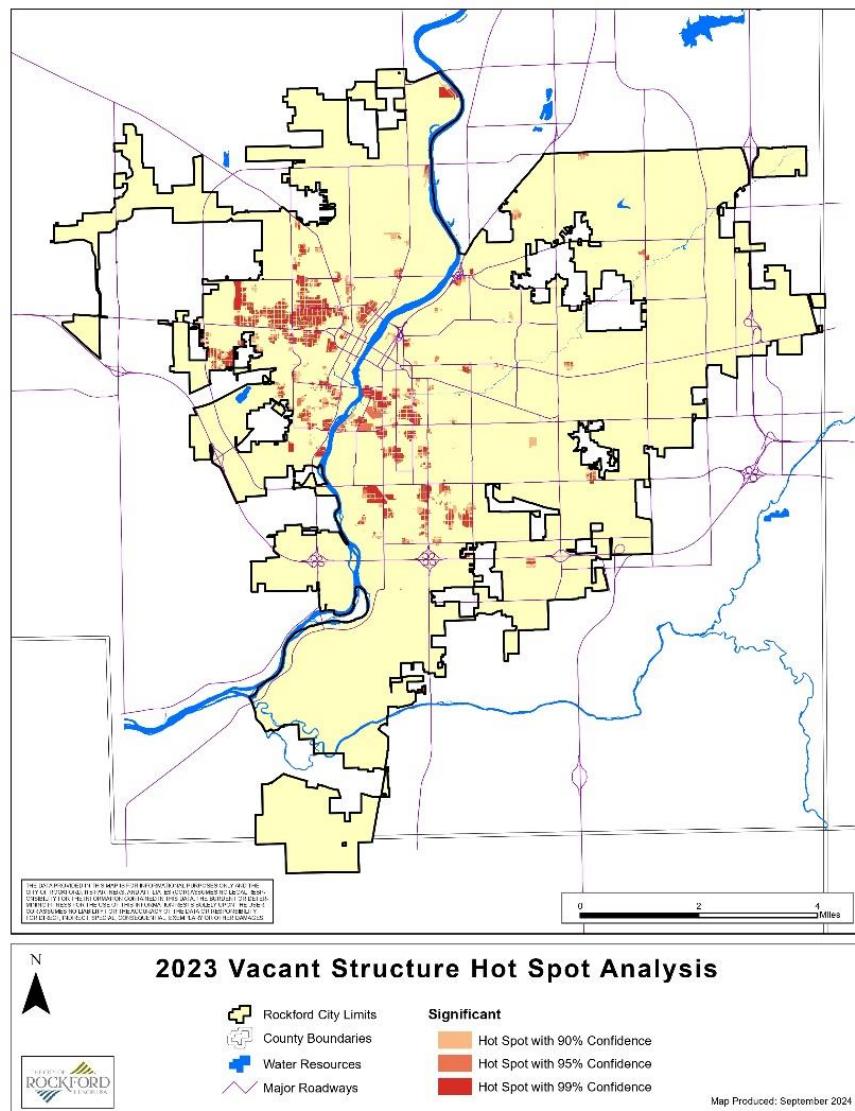
Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	25,515	77%	20,870	74%
Housing Units built before 1980 with children present	745	2%	1,535	5.5%

Table 8 – Risk of Lead-Based Paint

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

Vacant Units

There are approximately 68,000 housing units within the City of Rockford. Of these properties approximately 3,200 are considered to be a vacant lot with no structure currently. Of the 67,890 identified housing units in the City 61,242 are occupied while 6,648 are vacant. This means that the percent of occupied housing units is just over 90% of the total available units that are livable. Compared to 2018, in 2023, the average neighborhood had 17% fewer vacant residential buildings.



Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 9 - Vacant Units

Additional information or data unavailable at the time of this draft

Describe the need for owner and rental rehabilitation based on the condition of the jurisdiction's housing.

The majority of homes in Rockford were built in and prior to 1979 and these homes are likely to have one or more housing problems. The City had three open applications for various rehab programs in 2023 and 2024, and 400 low-to-moderate income (LMI) households applied for exterior rehabilitation, 175 LMI households applied for accessibility and rehabilitation, and 422 LMI and middle-income households applied for full home rehabilitation funding. Rehabilitation has been unaffordable and out of reach for these homeowners because of uneven equity recovery and lack of private loan options with suitable loan-to-value requirements.

The same is true of rental housing stock, since the City's new construction production has been minimal until now. Local landlords and landlords with small to medium portfolios have trouble accessing affordable financing options, and many are still recovering from the loss of cash flow during the pandemic due to the eviction moratorium imposed by the state.

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

There are approximately 25,515 owner-occupied and 20,870 renter-occupied housing units built prior to 1980.

The City supports Winnebago County Health Department's (WCHD's) application to the Healthy Homes Production Grant from the U.S. Department of Housing and Urban Development, and the WCHD has been successful in receiving funds with each application. Since 2007, WCHD has received the grant 6 times and over 560 housing units have received full lead mitigation, including both homeowner and rental units. In 2024, WCHD applied for their seventh grant, and expects to complete another 50 units and train 8 people in radon mitigation.

Discussion

The City has several initiatives that are aggressively working to address the condition of our housing stock and improve neighborhood equity. These efforts were in part the result of a Neighborhood Revitalization Strategy produced by Enterprise Partners for the City in 2019. That Strategy Document categorized neighborhoods as Emerging, Middle and Strong, and used physical structure data points to assign those definitions. Those data points included code violations, vacant structures and land, foreclosures, median property value, change in home price appreciation rate, homeownership rate, and residential permitting activity. The report then identified potential programs that could improve these data points in neighborhoods. The initiatives included:

- Region 1 Planning Council becoming the Winnebago County Trustee, and moving tax delinquent properties back into housing production
- Establishing the Northern Illinois Land Bank and clearing vacant land and structures from liens so that it could be sold successfully to developers.
- Moving the City's demolition focus from residential to commercial, since the previous two strategies decreased the number of residential homes that became blight.
- Funding Habitat for Humanity's Critical Home Repair Program to provide increased rehab services in key neighborhoods
- Securing new funding sources from the state for homeowner rehab programs.
- Establishing a rental registry and working with landlords and tenants to resolve code violations
- Establishing a vacant and foreclosed properties registry

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

Introduction

Totals Number of Units

	Certificate	Mod-Rehab	Public Housing	Program Type				Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based							
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *				
# of units vouchers available	0	340	1281	2,322	51	2,271	261	112	0				
# of accessible units	N/A	N/A	147	N/A	N/A	N/A	N/A	N/A	N/A				

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

Table 10 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

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

The following units are located at each public housing development:

- Park Terrace 98
- North Main Manor 97
- Olesen Plaza 96
- Jane Addams Parks Apartments 94
- Jane Addams Villa 92
- Blackhawk Courts 84
- Summit Green 96
- Orton Keyes Courts 76

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 11 - Public Housing Condition

Additional information or data unavailable at the time of this draft.

This information will be included in the final draft. Anyone wishing to find out more information on RHA's plans for their properties can review the RHA 5 Year Plan on their website:

<https://rockfordha.org/rha-5-year-strategic-plan/>

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

This information will be included in the final draft. Anyone wishing to find out more information on RHA's plans for their properties can review the RHA 5 Year Plan on their website:

<https://rockfordha.org/rha-5-year-strategic-plan/>

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

The Rockford Housing Authority employs a comprehensive strategy to improve the living environment of low- and moderate-income families residing in public housing. This strategy focuses on enhancing the quality, safety, and sustainability of housing, while also providing supportive services to promote self-sufficiency and community engagement.

Modernization and Maintenance: RHA prioritizes the ongoing maintenance and modernization of its housing units to ensure they meet current safety standards and provide a comfortable living environment. This includes upgrading aging infrastructure, improving energy efficiency, and ensuring compliance with accessibility standards.

Safety and Security Enhancements: To create a safer living environment, RHA has implemented security measures such as improved lighting, surveillance systems, and partnerships with local law enforcement. These efforts aim to reduce crime and enhance the sense of safety within housing developments.

Resident Services and Programs: RHA offers a variety of programs designed to support residents' personal and economic development. These include job training, educational opportunities, financial literacy workshops, and health and wellness initiatives. By providing these services, RHA helps families build the skills and resources needed to achieve greater independence.

Community Building and Engagement: RHA fosters a sense of community among residents through organized activities, resident councils, and initiatives that encourage participation in the management

and improvement of their living environments. These efforts help strengthen community ties and give residents a voice in decision-making processes.

Partnerships with Local Organizations: RHA collaborates with local nonprofits, businesses, and government agencies to bring additional resources and services to residents. These partnerships enhance access to healthcare, childcare, transportation, and other essential services that contribute to a better quality of life.

The Rockford Housing Authority will continue its work to deconcentrate R/ECAP areas while also working to improve and preserve existing affordable assets within low income census tracts. The Rockford Housing Authority will work with the City of Rockford Community & Economic Development department to best align strategies in order to meet the goals of the Five-Year Consolidated Plan. This includes the needs of senior/assisted/memory care, disabled supportive, special needs populations, aging out of foster care, veteran and re-entry housing. Additionally, in agreement and collaboration with the City of Rockford, RHA will work on issues of deconcentrating, de-densification, relocation, redevelopment, and reinvestment of public housing.

Discussion:

Not Applicable

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

Introduction

The City of Rockford has reached “functional zero” for Veteran and Chronic Homelessness. The City of Rockford’s strategy is to support the coordination and cooperation among agencies providing services to all homeless populations through the Northern Illinois Homeless Coalition Continuum of Care and the Built for Zero initiatives. The City and these agencies meet regularly and have numerous sub-committees to address the needs of the homeless and to support the new development of homeless facilities to house families and individuals as well as provide supportive services to address their needs.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year-Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	112	0	91	145	0
Households with Only Adults	226	0	54	306	0
Chronically Homeless Households	0	0	0	31	0
Veterans	9	0	13	107	0
Unaccompanied Youth	23	0	14	0	0

Table 12 - Facilities and Housing Targeted to Homeless Households

Data Source
Comments:

Data is based on 2023 Housing Inventory Count.

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

The City of Rockford partners with several healthcare organizations. Rosecrance, a mental health and substance abuse provider, Crusader Community Health (Healthcare for the Homeless), Mile Square Health Center-LP Johnson Rockford Clinic, and Rockford Regional Health Council are all members of the CoC. Additionally, the City works closely with UW-Health System who sees the majority of the homeless population. Locally the Rockford Fire Department has a Mobile Integrated Healthcare (MIH) program that partners a paramedic with a nurse from UW Health System to provide medical and behavior health/addictions case management within the community. The Crisis Co-Responder Team (CCRT), a partnership between the local Police Department and Rosecrance, provides services in the community to people suffering from a mental health/addiction crisis. Both MIH and CCRT are programs that work with the homeless population and partner frequently with the CoC agencies. City of Rockford HHS also

have a program to provide Mental Health Navigation services to those seriously mentally ill, unsheltered persons, to try linking them to needed services while working toward housing. All CoC agencies receive annual training on other public benefits such as IL State Supplemental Nutrition Assistance Program (SNAP), IL State Temporary Assistance for Needy Families (TANF), and Medicaid. The CoC and City Staff works closely with Workforce Connection, the local Workforce Innovation and Opportunity Act (WIOA) provider, to assist people in getting connected with employment or training programs. Many of the CoC agencies have staff trained in the Supplemental Security Income (SSI)/Social Security Disability Insurance (SSDI) Outreach, Access, and Recovery (SOAR) model to assist homeless clients in applying for SSI/SSDI.

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

Providers who are funded with ESG funds include the following:

- Remedies offers 24-hour emergency shelter support and has sixty-two (62) beds for those residing in the shelter.
- Youth Services Network has two youth shelters: The Bridge Emergency Shelter for males and Youth Services Network MELD shelter for females. Each shelter has eight (8) beds available and can expand up to ten (10) as necessary. Transitional housing is also available for young women with twenty-two (22) transitional apartments are available and six (6) permanent housing units.
- Shelter Care Ministries offers five (5) units of emergency shelter for families with minor children. This is not a congregate setting but individual apartments. They also offer seven (7) units of transitional housing for families with minor children. Shelter Care Ministries also runs the Jubilee Center which is a day time drop in center for homeless (and at-risk) individuals who suffer from mental health issues. They provide a meal, showers, laundry, and case management services.
- Carpenter's Place offers transitional housing programs to single (often chronically homeless) individuals including one veteran program. They also have a day time drop in center for homeless/at-risk adults where they provide meals, showers, laundry, mail pick up, job coaches, and other case management services.
- Veteran's Drop in Center is a daily place for veterans to get a meal, case management services, and linkages to other veteran services.

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

Introduction

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

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

The following needs and objectives below have been identified during the update to the Five-Year Consolidated Plan for our special need's population:

Elderly, Including Frail Elderly

- As people age, they develop physical limitations that prevent them from getting in and out of older housing that is not physically accessible (apartment buildings without elevators, doors not wide enough for wheelchair) which makes them shut-ins or forced to find alternative housing.
- Need accessible housing, in-home care that is emotionally and intellectually supportive/makes them feel respected and empowered, not demeaned or lessened as a human in order to remain in their homes;
- Need assistance with difficult family or other visitors;
- More affordable options or free services; too much fear about running out of money;

Persons with Disabilities (mental, physical, developmental)

- Need supportive, wraparound services / case management / pretty much full-time support to navigate not only the systems, but day-to-day living;
- Will accept illegal action against them (eviction without following procedure) to avoid further mental strain. They need opportunities for remedying situations with guidance and support.
- Frequently taken advantage of due to trauma responses and/or intellectual disability without anyone advocating on their behalf;
- Need to have housing that supports persons with complex post-traumatic stress disorder (C-PTSD) and violent tendencies which may lead to damage property. In addition, support for addressing cleanliness that may lead to hoarding.
- Need strong relationship between landlords and service providers in order to have assistance addressing issues with a tenant before it leads to eviction; and

- Need a “homeless growth” program – to encourage folks in shelters and other unstable housing environments to believe they *can* be more than they are.

Alcohol and Other Drug Addictions

- Need understanding of addictions, not judgment or unreasonable requirements;
- Rent money often goes to addictions instead;
- Need spaces created for smoking when it is forbidden within the building;
- Addressing that addicts are willing to do side jobs for drugs as payment.

Public Housing Residents

- Housing home buyer assistance, job training and job opportunities, housing counseling for home ownership, and assistance in finding affordable housing;
- Need support to address tenant’s children’s behavior when adult tenants are facing eviction for things beyond their control;

Survivors of Domestic Violence

- Need to continue to support local shelters and survivors’ services.

Other Supportive Housing Needs

- Need to address persons in poverty finding “treasures” in dumpsters, which brings in bedbugs, etc. – eliminate fear of reporting infestations.
- People with pets are most difficult to house; need housing that allows them to bring their pets, whether or not they are official service animals.
- Families need support when in impossible positions with children or other situations that threaten their housing stability (example of teen who insisted on camping in apartment basement and parents could not control him).
- Need additional, fully inclusive emergency shelter;
- Need transitional housing with supportive/wraparound services;
- Need second chance housing for felons, sex offenders;
- Large families in need of adequate housing; and
- Single moms, especially with multiple children, need extra support systems.

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

As with many large metropolitan areas there is an increased need for mental and physical health intervention and appropriate supportive housing needs.

Rosecrance provides inpatient and outpatient substance abuse and mental health treatment to teens, families, and adults. Rosecrance incorporates discharge planning in the treatment plans for all clients in order to ensure a client is exiting treatment with the appropriate tools and resources and into a suitable community and living condition. Through permanent supportive housing programs funded through CoC, Community Integrated Living Arrangement (CILA) units, and Harbor Housing (supportive housing) permanent housing is provided to those mentally ill individuals who are homeless.

Satori Pathway helps individuals, families, organizations and municipalities understand and manage the complex aging process people all face every day. Satori is an independent agency and not part of a “large healthcare system” and can quickly react to meet people’s needs. The Satori programs address many of the difficult issues facing older adults related to aging and end of life transitions. Seniors who are homeless have the most difficult time finding housing.

RAMP is a non-profit, non-residential Center for Independent Living (CIL) that emulates the Independent Living Philosophy with a mission to build an inclusive community that encourages individuals with disabilities to reach their full potential. RAMP services enrich individual’s lives. Oftentimes they meet with individuals who have experienced a traumatic or life-changing event (i.e. child recently diagnosed with a disability, accident resulting in permanent disability, etc.). These life-changing events can leave an individual reeling, as well as their family, and not knowing where to turn or what to do. It is this grassroots effort and philosophy to “meet someone where they are at” that drives this organization. RAMP is the only Center for Independent Living that serves Boone, DeKalb, Stephenson, and Winnebago Counties as well as the only agency providing advocacy and independent living services for persons with disabilities which supports them in remaining independent in their own homes in the community.

Stepping Stones is a private, nonprofit 501c3 community mental health provider in Winnebago County. By offering a variety of mental health treatment interventions and access to 24-hour services, Stepping Stones provide residents the opportunity to live in the most independent community setting. Locations are scattered, with a main office located in the downtown area of Rockford. Stepping Stones is a trauma-informed, person-centered mental health treatment provider, dedicated to those with serious mental illness. Stepping Stones recognize the person, not the illness. The organization works to bust stigma, to make positive contribution in the community and to provide safe, affordable and decent housing. Persons with serious mental illness have the right to a quality of life afforded by the least restrictive living environment.

The list above is not exhaustive. There are other service providers that work towards ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.

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

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

Housing - Increase the supply of affordable, accessible, decent, safe, and sanitary housing for the elderly, persons with disabilities, persons with HIV/AIDS, survivors of domestic violence, persons with alcohol/drug dependency, and persons with other special needs through rehabilitation of existing buildings and new construction.

Social Services - Support social service programs and facilities for the elderly, persons with disabilities, persons with HIV/AIDS, survivors of domestic violence, persons with alcohol/drug dependency, and persons with other special needs.

Accessibility - Promote and assist in making accessibility improvements for homeowners, making reasonable accommodations, and bring public facilities and infrastructure into compliance with Federal and State Laws.

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

- City needs to make processes "easier" – for example zoning barriers which have prevented expansion of supportive housing for lengthy amounts of time (Stepping Stones)
- An organization is needed to take ownership over development and management of crisis housing and transitional housing
- Refugee resettlement program: Catholic Charities cannot sign the lease for the refugees, but specific arrival dates can vary, which means landlords sometimes have to hold apartments without rent, but few are willing to do so.
- Programming needed to support immigrants/refugees who are at risk of losing housing once they are no longer receiving direct support from the program because finding jobs and transportation to jobs that support non-English speaking employees is extremely challenging.

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

Describe any negative Effects of Public Policies on Affordable Housing and Residential Investment

There are no known public policies in the City of Rockford that are a barrier to affordable housing.

The City's Department of Community and Economic Development monitors the following:

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

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

- **Impediment 1: Fair Housing Education and Outreach.** There is a need to educate persons about their rights under the Fair Housing Act and to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities and the disabled population who fear retaliation if they lodge a complaint.
- **Impediment 2: Need for Decent, Safe, and Affordable Rental Housing.** The City of Rockford does not have a sufficient supply of rental housing that is decent, safe, and sound. In many cases, landlords often don't maintain their property to code standard which results in unsafe living conditions for tenants. However, the monthly cost of rent for apartments has steadily increased due to the limited supply of rental housing, despite the condition of the rental unit.
- **Impediment 3: Lack of Affordable Homeownership Opportunities.** The population of Rockford has decreased since the 2010 U.S. Census and the percentage of share of renters has increased from 39%-46%. In some areas, the share of renters is as high as 70% or more. Home values and access to traditional mortgage financing have decreased since the recession, partly due to significantly higher credit standards and the age of Rockford's housing stock. Homes within an affordable price range require rehabilitation, which limits the availability of mortgage financing programs for lower income households.
- **Impediment 4: Need for Accessible Housing Units That Are For-Sale or Rent.** There is a lack of accessible housing units in the City of Rockford. Most of the existing housing units do not have accessible features. The City's disabled population has grown to 15.5% of the total population.
- **Impediment 5: Economic Issues that affect Fair Housing Choice.** There is a lack of economic opportunities in the City which prevent low-income households from improving their income and ability to live outside areas with concentrations of low-income households, which makes this a fair housing concern.

The City of Rockford's FY 2025-2029 Analysis of Impediments to Fair Housing Choice has identified the following impediments:

- **Impediment 1: Fair Housing Education and Outreach.** There is a need to educate persons about their rights under the Fair Housing Act and to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities and the disabled population who fear retaliation if they lodge a complaint.
- **Impediment 2: Need for Decent, Safe, and Affordable Rental Housing.** The City of Rockford does not have a sufficient supply of rental housing that is decent, safe, and sound. In many cases, landlords often do not maintain their property to code standards which results in unsafe living conditions for tenants. However, the monthly cost of rent for apartments has steadily increased due to the limited supply of rental housing, despite the condition of the rental unit.
- **Impediment 3: Lack of Affordable Homeownership Opportunities.** Referencing Census data, the population of Rockford has remained relatively stable between 2010 and 2020 decreasing by about 4,200 people or -3%. However, the population is projected to increase due to regional growth factors mainly related to current and planned job growth. Therefore, it is expected that the number of new dwelling units needed to handle this growth is between 3,200 and 9,100 units by the year 2032. Renter occupied units have increased from 39.5 percent in 2010 to 45.8 percent in 2019. In contrast, owner occupied units have decreased from 60.5 percent in 2010 to 54.2 percent in 2019.

Today the biggest issue facing affordable home ownership opportunities are availability and cost. In 10 years, the average price of a home in the Rockford area has more than doubled. An average home in Rockford would cost you just over \$88,000 in 2014 while in June of 2023 the same home on average would cost just over \$198,000. As of June 2024, the median price of a home in Rockford was \$155,377, a 17.9% increase from the previous year.

- **Impediment 4: Need for Accessible Housing Units That Are For-Sale or Rent.** There is a lack of accessible housing units in the City of Rockford. Most of the existing housing units do not have accessible features. The City's disabled population has grown to 32% of the total population.
- **Impediment 5: Economic Issues that affect Fair Housing Choice.** There is a lack of economic opportunities in the City which prevent low-income households from improving their income and ability to live outside areas with concentrations of low-income households, which makes this a fair housing concern.

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

Introduction

The Economic Development Division of Community Development is responsible for administering a variety of economic development programs and tools and collaborating with new and existing businesses and companies. The goal of the City of Rockford's economic development policy is to foster economic growth in the community, improve the local economy, and promote job opportunities especially for minority and women owned businesses.

Rockford, Illinois is located in the burgeoning I-90 growth corridor and is part of the 3rd largest economic corridor in the U.S. Close enough to Chicago to feel the breeze off lake Michigan, the Rockford Region offers distinct business advantages that simply cannot be had in the “big” city including a low cost of doing business and high quality of life. Rockford has high performing world class industry clusters in aerospace, automotive, logistics healthcare, and advanced manufacturing while offering land and building options to invest your business.

Economic Development Market Analysis

Business Activity

Industry Classification (NAICS)	Estimate	Percent
Civilian employed population 16 years and over	63,217	
Agriculture, forestry, fishing and hunting, and mining	235	0.4%
Construction	2,991	4.7%
Manufacturing	12,156	19.2%
Wholesale trade	1,519	2.4%
Retail trade	7,756	12.3%
Transportation and warehousing, and utilities	4,670	7.4%
Information	721	1.1%
Finance and insurance, and real estate and rental and leasing	2,467	3.9%
Professional, scientific, and management, and administrative and waste management services	6,202	9.8%
Educational services, and health care and social assistance	14,369	22.7%
Arts, entertainment, and recreation, and accommodation and food services	5,558	8.8%
Other services, except public administration	3,168	5.0%
Public administration	1,405	2.2%

Table 13 – Business Activity NAICS

Data Source: ACS DP03 Selected Economic Characteristics, 2022, 5-year estimate

Labor Force

Total Population in the Civilian Labor Force	69,481
Civilian Employed Population 16 years and over	63,217
Unemployment Rate for Ages 16 and Over	9.0%

Table 14 - Labor Force

Data Source: DP03, 2022 5-year estimate- Total Population and Civilian Employed, and S2301,- Unemployment Rate

Occupation by Sector	Estimate	Percent
<i>Civilian employed population 16 years and over</i>	63,217	
Management, business, science, and arts occupations	17,923	28.4%
Service occupations	12,365	19.6%
Sales and office occupations	13,176	20.8%
Natural resources, construction, and maintenance occupations	3,991	6.3%
Production, transportation, and material moving occupations	15,762	24.9%

Table 15 – Occupation by Sector

Data Source: ACS DP03 Selected Economic Characteristics, 2022, 5-year estimate

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	45,323	79%
30-59 Minutes	8,874	15.5%
60 or More Minutes	3,163	5.5%
Total	57,360	100%

Table 16 - Travel Time

Data Source: ACS B08303, Travel Time to Work 2022 – 5-year estimate

Education:

Educational Attainment by Employment Status (Population 25 to 64 years)

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
Less than high school graduate	5,860	699	4,394
High school graduate (includes equivalency)	14,202	1,813	6,231
Some college or Associate's degree	17,312	1,620	5,012
Bachelor's degree or higher	12,694	373	2,828

Table 17 - Educational Attainment by Employment Status

Data Source: ACS B23006 – 2022 5-Year Estimate Educational Attainment by Employment Status for Population 25–64 years old

Educational Attainment by Age

	Age				
	18–24 yrs.	25–34 yrs.	35–44 yrs.	45–65 yrs.	65+ yrs.
Less than 9th grade	638	508	865	2,210	1,544
9th to 12th grade, no diploma	2003	1822	1,830	3,688	1,996
High school graduate, GED, or alternative	5389	6550	5,251	10,451	8,036
Some college, no degree	2961	5700	3,703	7,987	5,459
Associate's degree	984	1551	1,744	3,259	1,870
Bachelor's degree	1005	2791	2,446	5,287	3,793
Graduate or professional degree	81	1171	1,561	2,639	3,104

Table 18 - Educational Attainment by Age

Data Source: ACS S15001 - 2022 5-year Estimate- educational Attainment by Age

Educational Attainment – Median Earnings Past 12 Months (population 25 years and over)

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	\$26,257
High school graduate (includes equivalency)	\$28,827
Some college or Associate's degree	\$36,145
Bachelor's degree	\$56,017
Graduate or professional degree	\$72,643

Table 19 – Median Earnings in the Past 12 Months

Data Source: ACS S1501 - 2022 5-year Estimate- educational Attainment by Age 2022 Inflation Adjusted Dollars

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

Based on the data tables above the 4 largest major employment sectors within the City of Rockford are as follows:

- **Educational services, and health care and social assistance** - 14,369 jobs (22.7%)
- **Manufacturing** - 12,156 jobs (19.2%)
- **Retail trade** - 7,756 jobs (12.3%)
- **Professional, scientific, management, administrative, and waste management services** – 6,202 jobs (10%)

Within the City the four (4) largest employment sectors equal a total of 40,483 jobs which is 64% of the total employment. This is a substantial number and shows that the City, and region as a whole is dependent on these sectors much more than others.

The following table lists the top twenty employers in the region, many of which employ Rockford residents.

All but one of the top five employers in the region are located within the City of Rockford, as of January 2022. Rockford Public Schools are the largest employer in the region, employing approximately 4,075 individuals. With healthcare being one of the leading employment industries in the city the top three regional healthcare systems hold the 2nd, 3rd, and 4th ranked major employer spots, with UW Health (formerly Swedish American Health System), employing 3,780 workers, MercyHealth employing 3,000 individuals, and OSF Healthcare employing a total of 2,200 people.

Top 20 Employers in the Rockford Region (January 2022)		
Company	Industry	Employees
Rockford Public Schools - RPS205	Education	4,075
UW Health (Formerly SwedishAmerican Health)	Healthcare	3,780
Mercyhealth	Healthcare	3,000
OSF Healthcare	Healthcare	2,200
Collins Aerospace	Aerospace Manufacturing	2,000
Woodward	Aerospace Manufacturing	2,000
UPS	Logistics & Distribution	2,000
Amazon	Logistics & Distribution	1,535
Wal-Mart Stores	Retail	1,470
Stellantis (Formerly Fiat Chrysler Auto)	Manufacturing	1,459
Winnebago County	Government	1,429
Harlem Consolidated Schools	Education	1,147
Lowe's	Distribution Center, Retail	1,110
City of Rockford	Government	1,102
Belvidere Community Unit Schools	Education	950
Magna	Auto Parts Manufacturing	816
General Mills/Green Giant	Cereal/Snack Bars	650
Syncron	Automotive Supplier	600
Taylor Company	Ice Cream Machines	500
Bergstrom, Inc.	Manufacturing	400

Source: Rockford Area Economic Development Council and City of Rockford

It's important to note that workers at these three employers are spread throughout the city at various schools, facilities, and clinics.

Describe the workforce and infrastructure needs of the business community:

Rockford has continued to grow and emphasize workforce training opportunities. However, businesses continue to report a need for stronger soft skill workforce training. Employers identified issues with attendance, punctuality, workplace communication, and attachment to cellular devices.

Rockford's business community's infrastructure needs are a mix of transportation, utilities, technology, and location. Rockford's public transportation has improved, by adding routes to connect employees to large employers. As the need for workforce increases, this needs to be continued in order to make the appropriate connections. Through a project called Rockford FiberCity, fiber internet cables will be laid throughout the City bringing high-speed internet to residents, and businesses.

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

In 2023, the Illinois Department of Transportation announced that multiple projects in the Rockford area were completed, planned or underway, thus highlighting an ongoing commitment made possible by Gov. JB Pritzker's historic, bipartisan capital program. Eight major projects represent a total investment of more than \$266.5 million, improving safety and mobility while sustaining and creating good-paying jobs throughout the region. These projects will increase the efficiency of the transportation network resulting in more efficient just in time transportation and cargo from the Rockford International Airport and other truck routes for both internal to external and internal to internal trips. These major investments will attract new businesses, cause existing businesses to expand and overall will attract new employment to the region. Therefore, there needs to be a major emphasis on new housing construction of all types and affordability.

Four projects were scheduled to be completed in 2023 and the remaining four are expected to be completed from 2024 through 2027.

Bypass U.S. 20 from the Rock River to Alpine Road. Resurfacing, including the ramps at the Illinois 251 (11th Street) interchange. Other work includes guardrail improvements and lighting updates. Traffic will be reduced to one lane in each direction using median crossovers and barrier walls. Staged closures of the Illinois 251 exit ramps with detours will be utilized.

Perryville Road over Interstate 39. A bridge replacement started this spring as part of advance work leading to the \$247.6 million, multiyear project to improve I-39 between the Bypass U.S. 20/Harrison Avenue interchange and Blackhawk Road.

I-39 and Bypass U.S. 20 interchange. Reconstruction began in July with the closure of Linden Road to build a bridge that will cross the new southbound lanes of I-39. This project is expected to be completed

by the end of November, weather permitting. Construction of the interchange continues through 2024 with the replacement of the Mulford Road bridge and construction of the new northbound and southbound I-39 lanes and reconstruction of Bypass U.S. 20.

Alpine Road from Harrison Avenue to Charles Street. Resurfacing was completed in mid-June.

Illinois 76 over Beaver Creek in Boone County. Expansion joint replacement and concrete deck overlay of this bridge was completed in mid-July.

I-39 at Harrison Avenue. Work will convert this interchange from a cloverleaf to a modern, safer diverging-diamond design. Other improvements include replacing the I-39 bridges and expanding Harrison Avenue from South Mall Drive to Mill Road. Work is anticipated to begin in 2024 and wrap up by the end of 2025.

I-39 Bypass U.S. 20 to Harrison Avenue. Work will expand the road from four to six lanes with an accessory lane. The project also will replace several bridges, anticipated to begin in 2025 and wrap up by the end of 2027.

Bypass U.S. 20 from Mill Road to the Kishwaukee River. Work includes expanding from four to six lanes, improving the intersection with Mill Road and replacing the bridges crossing the Kishwaukee River. Work is expected to begin in 2025 and conclude in 2026.

"As the vibrant hub of Northern Illinois' diverse commerce and industry, it is imperative for the Rockford region to maintain and strengthen our transportation infrastructure in every facet," **said state Rep. Joe Sosnowski (R-Rockford).** "The bipartisan investments we continue to make are reaping benefits for working families and job creators throughout the Rockford area."

"Investment in the Rockford region's infrastructure helps to spark economic opportunity," **said state Rep. Maurice West (D-Rockford).** "If we want to attract development and jobs, we have to make sure our transportation network is ready to meet modern demands."

"Rebuild Illinois is helping to create jobs, making our transportation infrastructure safer and encouraging greater investment in our community," **said state Rep. Dave Vella (D-Rockford).** "It's critical that we continue to build on this progress as we position this region for further development."

Additionally, at the City level, there are several ongoing efforts to support and encourage economic impact. Two primary focus areas are the development of "shovel ready" sites and growing entrepreneurship. The US-20/IL-2 area contains 485 acres of partially developed land with immediate access to Chicago Rockford International Airport (one of the fastest growing cargo airports in the world), interstate highways, and a major railway. The City of Rockford intends to construct public improvements, including roadway, bridge, and water main extensions to increase site readiness for potential large economic drivers. Additionally, the City continues its support to establish the Think Big Minority Business Accelerator at the Provenzano Center. The center is a training, education, and

incubator space for entrepreneurs to receive coaching and other resources as they open or grow their business.

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

The Rockford Region can produce and sustain a well-educated and skilled workforce. However, there are significant challenges in attracting and retaining them. A well-trained workforce, and the impact it can have on the lives of those workers, is significant to economic development. As part of its economic development plan, Rockford places a strong value on working closely with and supporting local organizations and leaders in the community to ensure that citizens are provided training opportunities. These opportunities enable residents to thrive in the workforce and continue to meet the needs of the community's employers. Workforce development not only provides educational and career training programs that prepare those entering the workforce, but may also connect employers to a skilled workforce through employment services. Providing assistance and resources for job seekers is central to Rockford's economy and ensuring that businesses and employees thrive in it.

Another strategy tied to economic and workforce development is talent attraction and retention efforts that ensure a robust talent pool within the city. These efforts aim at incentivizing and cultivating an environment in which individuals find attractive to live and then decide to seek employment in that location. In the long run, investing in retention and attraction efforts can make cities more competitive and allow them to better leverage their current or future assets. Talent and attraction efforts provide a wide range of benefits that support local businesses and the community. For example, these efforts can create a unified employee-employer network, increase innovation and entrepreneurship, and incentivize community development and advancement. Attracting and retaining a workforce is the foundation for increased business growth, a factor playing a significant role in the overall economic development. Furthermore, workforce development-related incentives and programming can not only generate increased productivity and profitability in the workforce, but also curate an environment that embraces community well-being and place-making.

Overall, the City of Rockford and the region as a whole is able to meet the employment needs and opportunities of the Jurisdiction; however, as jobs are expected to increase over the next 5-10 years additional residential development is needed immediately to accommodate for this expected growth.

Other areas that need improvement are with the unemployment rate and the level of education of residents in the City. The American Community Survey 2022 5 Year Estimate states Rockford's unemployment rate at 9%, higher than the State of Illinois' which is 4.7%. Additionally, there are 115,910 individuals 16 years older and 55% (63,217) are employed.

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

Highlighted below are just a few of the key partners and initiatives that are furthering the development of the city's labor force.

Advanced Technology Center: Rock Valley College's Advanced Technology Center (ATC) recently opened in Belvidere as a state-of-the-art advanced manufacturing learning facility. The 77,000 square foot facility will house programs aimed at meeting the educational needs of residents and the skill needs of area businesses. The ATC will offer a variety of courses, including CNC machining, industrial maintenance, mechatronics, truck driver training and welding, in an effort to serve as an economic engine and a workforce development hub the region.

Rockford University's Education Pathway Program: The RU Education Pathway program is an innovative plan designed to incentivize Rockford Public Schools (RPS) students to pursue a teaching career in Rockford. RU partners with RPS to recruit students interested in pursuing a teaching degree beginning in middle school. Once in high school, students are able to join the education pathway and partake in a dual credit capstone course taught by both RU and RPS faculty. Following high school graduation, these students are able to enroll at RU and receive discounted tuition for their teaching degree. Enrolled students often pursue student-teaching at an RPS school and are better positioned for a full-time position with the Rockford public school system.

Alignment Rockford: Alignment Rockford is a nonprofit organization that works to support students within RPS and ensure their post-graduation success. This organization supports Rockford students with hands-on and virtual industry experience that not only assists students in determining their future careers, but also grows prospective talent for local employers.

The Workforce Connection: The Workforce Connection (TWC) is a partnership of employment and training programs, serving individuals and businesses in Boone, Stephenson, and Winnebago Counties. TWC provides numerous programs and initiatives that support workforce development and talent retention. TWC offers a wide range of services that give career seekers the opportunity to find employment, education, and training opportunities within the region. TWC also works with employers to find skilled workers and access other services, including education and training opportunities for their current workforce. Career services include workshops and basic skills classes, career information, job search and resume assistance, GED completion program, and professional training.

Rockford Public Schools (RPS205) Rockford Promise Program: RPS205 is one of the largest school districts in Illinois, educating approximately 28,000 students annually from early childhood through high school. Rockford Promise is a non-profit 501(c)(3) location-based scholarship program that offers full-tuition scholarships to deserving graduates of Rockford Public School District 205. Modeled after Promise programs around the nation, the goal is to increase educational attainment in our community while providing a powerful economic incentive for residents and businesses to locate in the Rockford

region. In addition to full-tuition college scholarships, Rockford Promise also supports Scholars with robust community mentorships, strong academic advising and meaningful social connections to ensure they earn their degrees and jumpstart successful careers.

Goodwill Excel Center is a free high school for adults that awards industry-recognize certifications and high school diplomas to adult learners.

NIU Engineering at Rock Valley College is the product of a collaboration between NIU, Rock Valley College (RVC) and regional industry partners to foster local talent. Rockford area industry partners offer scholarships, mentorship, internships and job opportunities. Participants earn their B.S. in Applied Manufacturing Technology or Mechanical Engineering from Northern Illinois University while taking classes at Rock Valley College.

Rock Valley College's Aviation Maintenance Technology Program located at the Chicago Rockford International Airport, provides a direct talent supply chain to the AAR maintenance repair and overhaul facility.

Saint Anthony College of Nursing and the U of I Chicago College of Medicine programs support the expanding healthcare system. The Saint Anthony College of Nursing offers a four-year nursing degree program located at newly constructed Health Sciences Center on the Rock Valley College campus. The U of I College of Medicine now provides all four-years of coursework on the Rockford Campus.

Rockford Career College offers multiple programs including welding, construction administration, electrical technician, and medical assistant.

There are also apprenticeship programs offered by regional trade unions. Taught by skilled craftsmen, apprentices earn a living wage throughout the education process. When the apprenticeship is complete, workers receive an internationally-recognized trade certification. Depending on the chosen program, apprentices may also earn college credits or an associate's degree.

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

Yes, Northern Illinois (Winnebago, Boone, and McHenry Counties) has a current Comprehensive Economic Development Strategy for 2021-2025. City staff is participating in the development of the CEDS 2026-2030.

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

2021-2025 Comprehensive Economic Development Strategy for Northern Illinois Key Implementation Activities:

- Support Rockford airport officials on cargo, MRO, and other development opportunities through economic development efforts, incentives, and capital procurement for infrastructure upgrades.
- Improve amenities and infrastructure at the Rockford Global Trade Park and the Kishwaukee and 11th St. gateways, and make available parcels shovel-ready and marketable for industries that would benefit from proximity to the Chicago Rockford International Airport.
- Extend fiber to key job creation sites and community institutions within the region, while also ensuring fiber redundancies for stable connections.
- Site and develop an industrial campus with proximity to Chicago-Rockford International Airport, Winnebago County landfill, and the Rock River Water Reclamation District, with a focus on renewable energy generation, coupled with waste-to-energy developments to anchor supportive rail-served industrial parks.
- Explore and seek funding for the reuse of existing developed facilities in the region, such as the Barber Colman site in downtown Rockford.
- Create an infill development strategy which identifies, prioritizes, and provides a comprehensive redevelopment plan for residential neighborhood blocks, commercial corridors, and buildings in need of repurposing or redevelopment.
- Promote financial support for small businesses such as loan and investment programs; specifically, in response to major economic downturns.

Local & Regional Plans or Initiatives That Impact Economic Growth

2050 Metropolitan Transportation Plan for the Rockford Region: The RPC is responsible for developing the regional Metropolitan Transportation Plan (MTP), sometimes referred to as the long-range transportation plan (LRTP). The plan covers Winnebago, Boone, and northern Ogle Counties and aims to identify the region's transportation vision, strategies, and priorities for future transportation. The most recent iteration was adopted in July, 2020. When updating this CEDS, RPC staff looked to align the two plans, particularly on goals related to transportation infrastructure investment.

City of Rockford 2040 Comprehensive Plan: This plan provides a vision for the future of Rockford, focusing on city policies and strategies to help guide physical development. The Plan was adopted by City Council on October 2nd 2023, and became official on October 30th, 2023 after filing with the Winnebago County Recorder's office. The Plan is based on a 10-20-year horizon with a review period of about every 5 years. The Plan acts as a guide to coordinate and align zoning and land-use, transportation

infrastructure, economic development investments, natural resources and open space protection, and the general needs and concerns of community members. It serves as the community's voice and portrays what the future could look like while serving as the decision-making tool for elected and appointed officials regarding overall development, conservation, and public investment within the City of Rockford's municipal boundary.

City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032.

The City of Rockford contracted with Redevelopment Resources for this study to help elected officials, City staff, stakeholders and community members develop a meaningful sense of the housing market, an understanding of key housing issues and how they will impact the city over the next ten years. This study began in the fall of 2023 and culminated with the development of implementable strategies for growing the existing housing supply and policy change recommendations.

This housing needs and market assessment has been created to provide leaders with a solid understanding of: functions of market demand (population, employment, and income growth), inventory of existing housing supply, demand forecast, gap analysis for the next 10 years, and overall housing affordability. This study shares the current context and outlines many activities to significantly improve the housing landscape in the City of Rockford.

Discussion

Currently, there are many local agencies, community groups, and social service organizations that are working towards increasing the number of local jobs as well as job training and job attraction efforts to fill those opportunities as they come online. Economic development efforts in Rockford in recent years have focused on job development, attraction and retention while utilizing or local workforce to fill positions first.

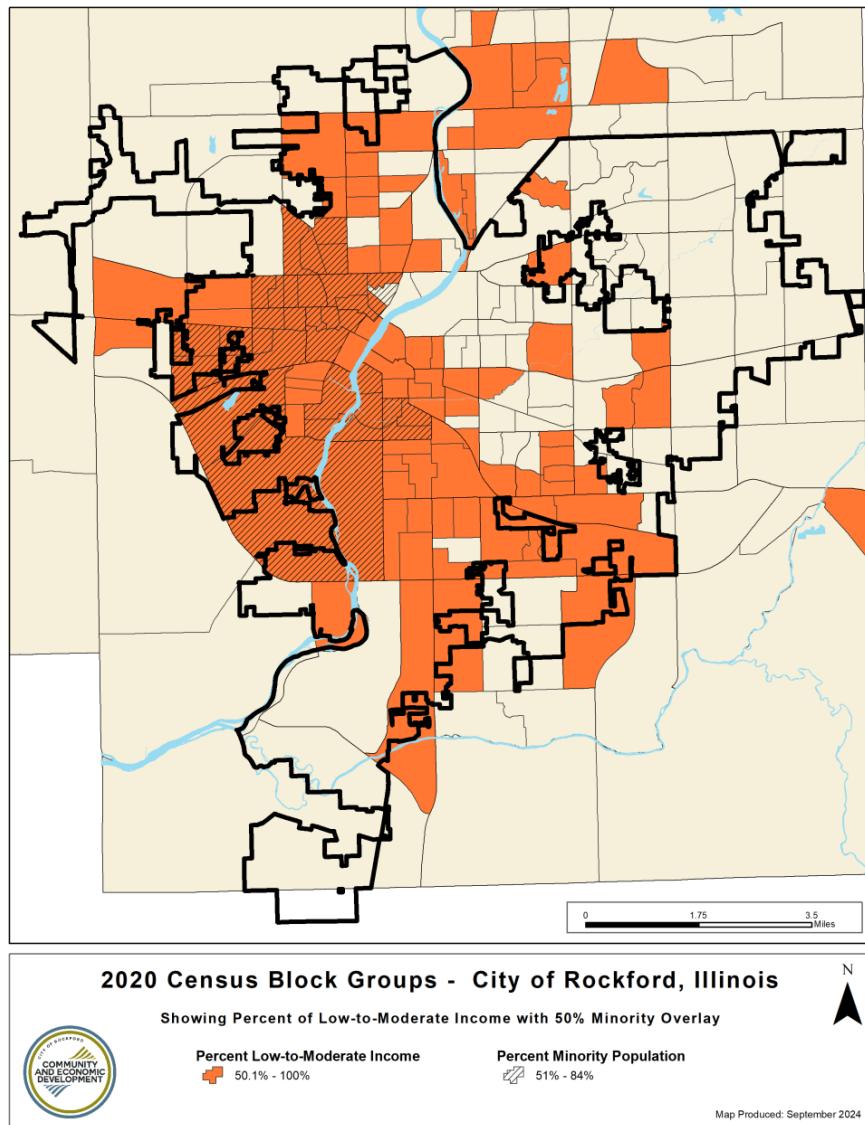
MA-50 Needs and Market Analysis Discussion

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

Households with multiple housing problems are located throughout the City of Rockford; however, there are concentrations within the City itself. As outlined previously the population that lives to the west and south of the city center have high concentrations of low-to-moderate income households while also having higher concentrations of minority populations.

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

Yes. There are concentrations of racial or ethnic minorities that align with low-to-moderate income data. These concentrated areas are located to the west and south of the city center according to the data provided by HUD for years 2016-2020 ACS for the CDBG CHAS programs.



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

The areas to the west and south of the city where the highest concentrations of low-income and minority populations reside, are also some of the area's most in need of revitalization and investment. This area of the City contains a large portion of the oldest housing stock as well as many vacant and abandoned structures of all types and uses. There is a very high percentage of renters, the lowest concentration of home-owners, much higher than average foreclosures, very high amounts of code violations and life safety housing condition concerns.

In more recent years, however, this area has seen unprecedented investment and blight reduction efforts at the neighborhood levels. Rockford's largest and most expensive housing development project in its history is currently underway at the Coleman Yards Campus.

Are there any community assets in these areas/neighborhoods?

Yes, many. community centers, parks, and other public facilities.

Are there other strategic opportunities in any of these areas?

Yes, there are. The City has concentrated blight reduction efforts specifically in these areas. Over 600 homes have been demolished that were to the point of no return in regards to rehabilitation efforts. These voids within the neighborhoods offer a real opportunity to redevelop the vacant residential lots with new single-family housing.

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

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

Access to broadband is a critical component of staying ahead of the curve and will improve the lives of families, entrepreneurs, farmers and other Illinoisans who rely on high-speed broadband for everything from healthcare to education. Governor Pritzker launched a statewide initiative, about 5 years ago, called Connect Illinois in order to expand broadband access across the entire state. Not only are businesses able to connect to Fiber Broadband very soon, but every single residence in the City of Rockford will be able to also. In fact, some already have connections.

Until recently, Rockford households had few options for home internet, with only one high-speed internet provider (Comcast/Xfinity) serving our community, allowing for prices to be extremely high. While Comcast has been working to bridge the digital divide by offering Internet Essentials from Xfinity for \$9.95/month, it only provides speeds up to 50Mbps. For speeds up to 100Mbps, low-income customers must pay \$29.95/month. Their NOW pre-paid unlimited plan for moderate income families costs \$55/month and requires a bundle that includes cellular data; internet is not available separately. When the Covid-19 pandemic hit, the need for reliable home internet skyrocketed especially for low-income residents because so many of them chose the remote option for their children's schooling to keep them healthy as so many of our low-income residents are made up of racial groups which were disproportionately impacted by the virus.

Now Rockford is seeing fiber being laid on every residential street by two different companies, which will eventually provide multiple options for internet service; however, much of the fiber which has already been laid is located in the northeast quadrant of Rockford, for higher income households.

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

In any market increased competition is healthy. Now with the City of Rockford having Fiber available to all businesses and homes there will now be options to choose from more providers. Currently, the only option for tv and internet is Comcast and it is extremely expensive.

As additional ISPs become more and more available to provide residents with multiple choices for internet, competition should be created that lowering costs. A new provider in Rockford, i3, offers 100/100mb speeds for only \$24.99/month, which is a \$5 savings from Xfinity's similar plan. Coextro is another ISP offering services in some areas in Rockford, and their commitment to outreach through direct mailers and proposed collaboration with the local housing authorities should help low- and moderate-income residents become more aware of competitive opportunities; however,

Comcast/Xfinity has seemed to anticipate these types of efforts and has been sending out mailers for several months now – something they had not done before. Their push to connect low- and moderate-income subscribers to Xfinity internet services prior to others going online and at a higher price underscores the need for competition to drive down costs.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

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

Table 11: 2019 Winnebago County Multi-Hazard Mitigation Plan (MHMP) Hazards Profiled

HAZARD
FLOODING
SEVERE STORMS
TORNADOES
HAZARDOUS MATERIALS STORAGE AND TRANSPORTATION
WINTER STORMS
DROUGHT/EXTREME HEAT
DAM AND LEVEE FAILURE
EARTHQUAKES
GROUNDWATER SHORTAGE

Table 12: National Centers for Environmental Information (NCEI) Storm Events 1950 to 2019

EVENT TYPE	NCEI PROPERTY DAMAGE ESTIMATE	NCEI PROPERTY DAMAGE ESTIMATE (IN MILLIONS USD)	PERCENT SHARE OF EVENTS
WINTER STORM/BLIZZARD	29	-	8.22%
DROUGHT/EXCESSIVE HEAT	11	-	3.12%
FLASH FLOOD/FLOOD	62	30,932,000.00	17.56%
THUNDERSTORM	235	5,561,500.00	66.57%
TORNADO	16	5,440,000.00	4.53%
TOTAL:	353	41,933,500.00	100.00%

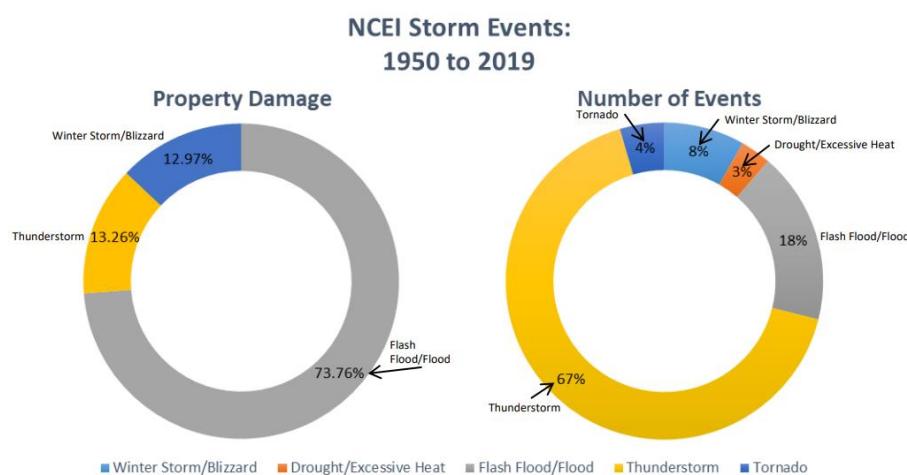


Figure 14: National Centers for Environmental Information Storm Events from 1950 to 2019

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

One of the areas that has seen a substantial amount of flooding over the years is that of the Keith Creek Corridor. A Keith Creek Corridor study was completed in 2022.

Part of the study included a diversity, equity and Inclusion analysis (DEI). The DEI analysis takes a closer look at certain demographic factors in specific census tracts located within the Study Area. These tracts include 6, 10-18, and 21, are located in CDBG eligible areas and are more likely to have low income concentrations. They have lands abutting or in close proximity to Keith Creek. DEI factors have been selected because they are either indicative of barriers faced by the population or because they are known to be a barrier to equitable and inclusive treatment and quality of life. The relevant factors include race, income, age, education, citizenship, language, disability, means of transportation to work, poverty status, and food stamp usage.

The DEI analysis suggests that areas in the western portion of the Study Area have a higher percentage of non-white residents, have lower educational attainment, and are less likely to be U.S. citizens. People in this area are more likely to have a disability and use food stamps. Residents in this area also have lower household incomes and are more likely to speak a language other than English at home. They are likely to drive alone to work and there are more than twice as many residents above the poverty level than in non-DEI census tracts.

Those who reside in western portion of the Study Area, in census tracts 6, 10-18, and 21, are more disadvantaged and face more hardships than the rest of Rockford.

Figure 4: Demographic Study Areas Map

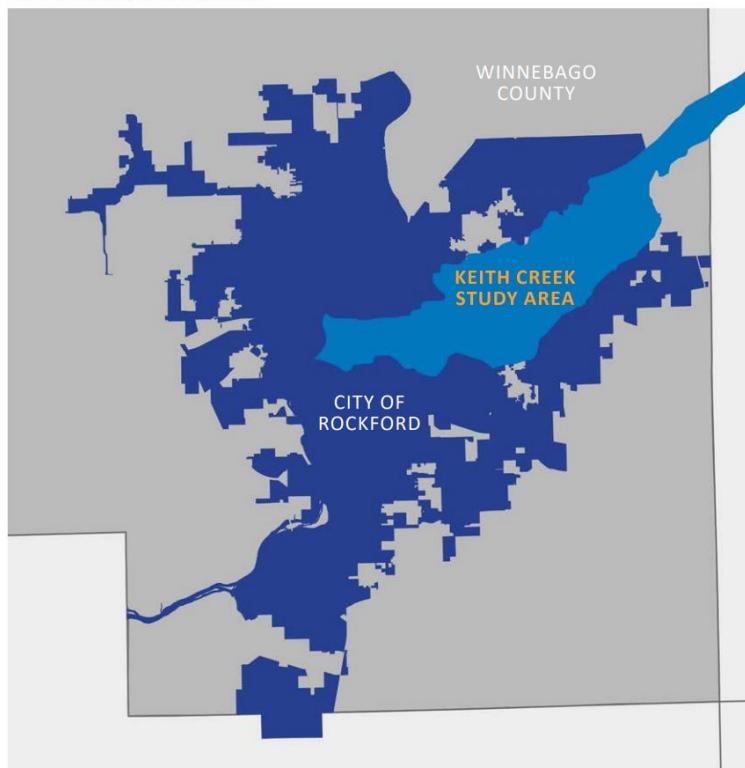
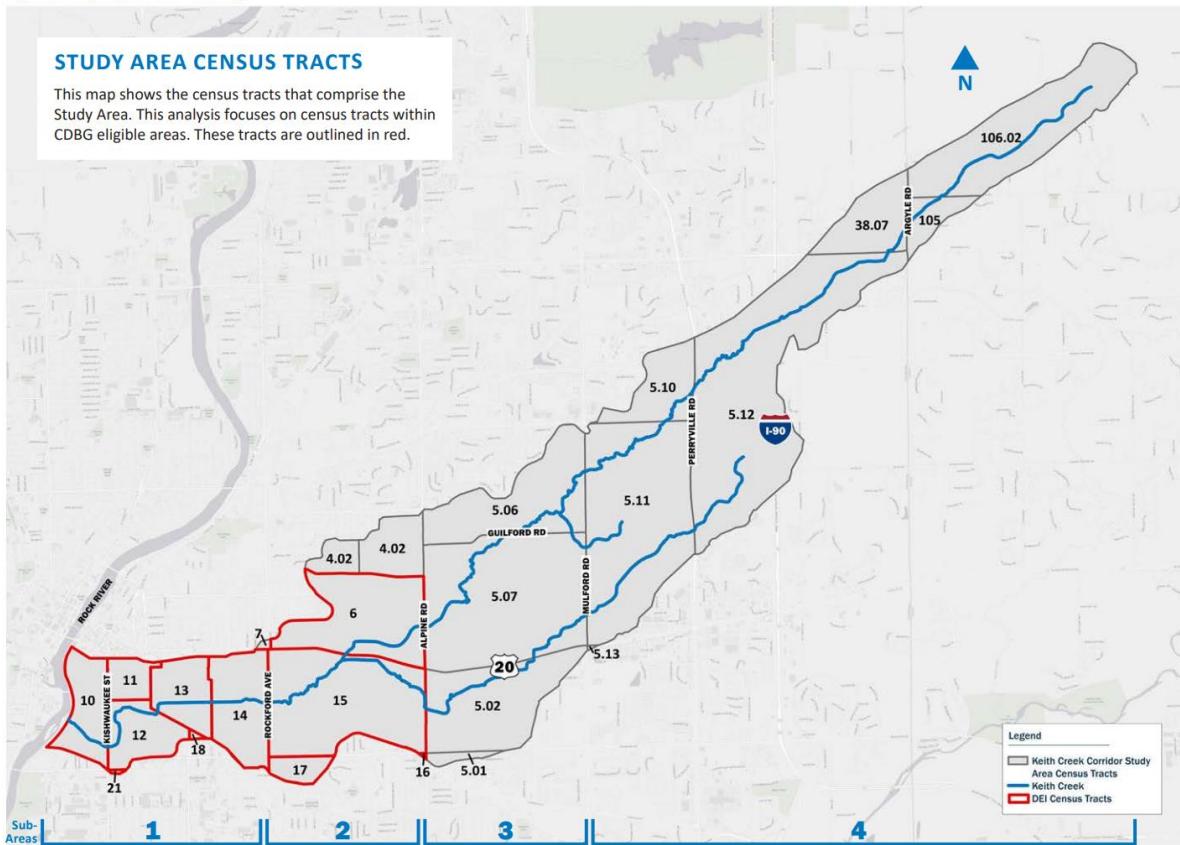


Figure 3: Study Area Census Tracts Map



INCOME: MEDIAN INCOME

Income is tied to socioeconomic class and economic inequality. Areas with lower median incomes tend to have access to less goods and services, which contributes to a lower quality of life. Table 12 shows the median income of all census tracts within the Keith Creek Study Area. DEI census tracts have a lower median income, with the average median income among census tracts being \$36,526. Non-DEI census tracts in the Keith Creek Study Area have an average median income of \$80,631. The City of Rockford's average median income is \$44,252.

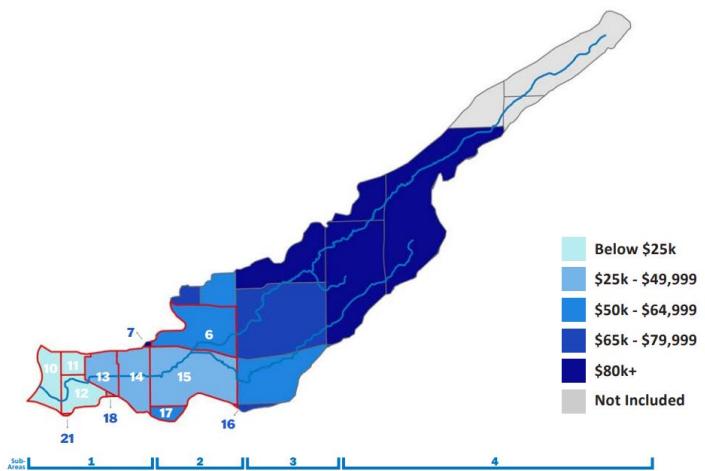


Table 6: Median Income

Geography	6	10	11	12	13	14	15	16	17	18	21	DEI	Non-DEI	Keith Creek	Rockford	Winnebago County
Median Income	\$60,385	\$15,013	\$16,625	\$21,713	\$35,434	\$47,216	\$49,331	\$36,323	\$63,053	\$36,914	\$19,776	\$36,526	\$80,631	\$52,800	\$46,438	\$57,205

Source: US Census Bureau American Community Survey 5-year Estimates 2015-2019

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The City's plan has been honed over the years, and as such, a well-tuned strategy has been developed as the result of meetings with agencies/organizations, public hearings, community meetings, resident survey, agency/organization survey, and consultations. It is based on the needs assessment and market analysis as these have changed over time and so do the implementable strategies to address them.

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

The principles of the FY 2025-2029 Consolidated Plan (Con Plan) are as follows:

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

The priority needs of the FY 2025-2029 Consolidated Plan were determined based on the following:

- Research of existing data on needs of the City
- Thorough consultation with Federal, State, and local City staff and/or officials
- Interviews, planning focus groups, and listening sessions with stakeholders
- Public hearings
- Community meetings
- Survey responses from residents, agencies/organizations (housing, homeless, and economic development), businesses, and social service providers

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

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

SP-10 Geographic Priorities – 91.215 (a)(1)

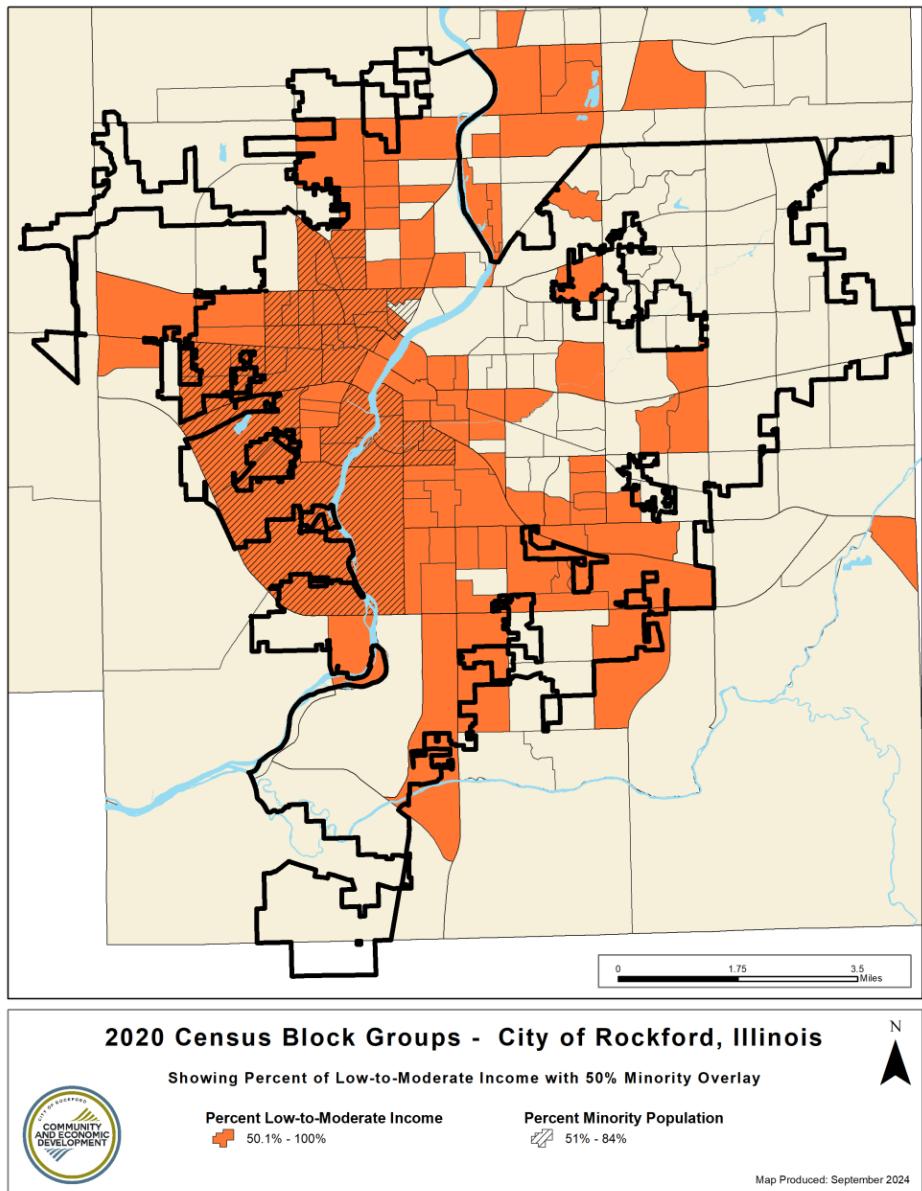
Geographic Area

Table 1 – Geographic Priority Areas

1	Area Name:	CDBG Eligible Areas
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Area includes all of the census blocks that have 51% or more low-income households
2	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
	Area Name:	City Wide
	Area Type:	Non-targeted for Low-Mod Individual Benefit and Administration
	Other Target Area Description:	Non-targeted for Low-Mod Individual Benefit and Administration
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	

	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	

Below is a map of the Low-to-Moderate income Census Block Groups



General Allocation Priorities - Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The City of Rockford (City) will continue to allocate its CDBG, HOME, and ESG funds to those geographic areas most in need, which are those whose population is over 51% low- and moderate-income (known as the CDBG Eligible Area). The City housing programs are generally available on a City-wide basis in an effort to increase inclusivity.

There are 98 Block Groups that are considered low- to moderate-income in the City of Rockford. They are as follows:

Census ID	Low-To Moderate Income Percent	Census ID	Low-To Moderate Income Percent	Census ID	Low-To Moderate Income Percent
172010026004	100.0%	172010034004	79.9%	172010037092	65.8%
172010031005	99.4%	172010028001	79.6%	172010019002	65.8%
172010010003	99.3%	172010013001	78.4%	172010011001	65.7%
172010012002	98.5%	172010033001	78.0%	172010018002	65.4%
172010026002	96.5%	172010024002	77.4%	172010033002	63.8%
172010026001	95.3%	172010031004	76.8%	172010036041	63.7%
172010027004	94.4%	172010021001	76.5%	172010010002	63.3%
172010029001	93.8%	172010014002	76.4%	172010037091	62.8%
172010012003	93.5%	172010028002	76.1%	172010019004	62.8%
172010016001	93.3%	172010027003	76.0%	172010008003	62.5%
172010032003	93.2%	172010036062	74.2%	172010027002	62.5%
172010011002	92.4%	172010013002	73.9%	172010037061	62.3%
172010020003	92.1%	172010033004	73.9%	172010004022	61.9%
172010025002	90.6%	172010033003	73.7%	172010023013	61.9%
172010024003	90.3%	172010015005	73.1%	172010016005	60.2%
172010029002	88.8%	172010036022	72.0%	172010018006	59.6%
172010016002	88.6%	172010005022	71.8%	172010020002	59.4%
172010019001	87.7%	172010036051	71.5%	172010005021	58.6%
172010020001	87.7%	172010037083	70.6%	172010036042	57.9%
172010012001	85.6%	172010037081	70.5%	172010023011	57.6%
172010016004	85.2%	172010037071	70.0%	172010022002	57.6%
172010008002	84.7%	172010031002	69.0%	172010004032	57.5%
172010032001	84.5%	172010018004	68.5%	172010008001	57.1%
172010027001	83.4%	172010022001	68.2%	172010037113	56.9%
172010016003	83.1%	172010031001	67.6%	172010023012	56.6%
172010025003	82.3%	172010014001	67.4%	172010017002	56.1%
172010036043	81.3%	172010037115	67.3%	172010025004	54.9%
172010005073	81.1%	172010013003	67.2%	172010018003	54.8%
172010018005	80.8%	172010034003	66.7%	172010034002	53.2%
172010024001	80.3%	172010018001	66.4%	172010023021	53.1%
172010032004	80.1%	172010010001	66.3%	172010035003	51.4%
172010026003	80.0%	172010014004	66.1%	172010032002	51.4%
		172010005014	65.9%	172010025001	51.3%

Table 2 – Low-to-Moderate Income Block Groups

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 3 – Priority Needs Summary

1	Priority Need Name	Housing Strategy
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Non-targeted for Low-Mod Individual Benefit and Administration CDBG Eligible Areas

	Associated Goals	HS-1 Housing New Construction HS-2 Preservation of Housing HS-3 CHDO Support & Development HS-4 Homeownership HS-5 Fair Housing HS-6 Project Delivery
	Description	There is a need to increase the amount of decent, safe, and sanitary housing that is affordable for homebuyers, homeowners, and renters.
	Basis for Relative Priority	The City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032 identified an estimated demand for housing over the next ten years to be between 3,200 and 9,100 units. In addition, the consultations and data research completed as part of this Consolidated Plan demonstrates the continued need for housing, as well. The Needs Assessment included in this Consolidated Plan details many of the housing needs in Rockford.
2	Priority Need Name	Homeless Strategy
	Priority Level	High

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Non-targeted for Low-Mod Individual Benefit and Administration CDBG Eligible Areas
	Associated Goals	HMS-1 To Reach Functional Zero for Families, Youth, and Single Adults
	Description	There is a need for support services and housing opportunities for homeless persons and persons or families at-risk of becoming homeless.

	Basis for Relative Priority	<p>Some of the reasons include, but are not limited to the following:</p> <ul style="list-style-type: none"> • Nationwide, the homeless Community Solutions, Built For Zero Challenge is to be Functional Zero For All. According to the CoC, it takes approximately 91 days on average for a person who has become homeless to be permanently housed again. The Goal for the CoC is 45 days, which is the goal for Functional Zero for All. • At the time of the CoC By-Name List of homeless, thirty-nine (39) families with minor children were in need of housing assistance. Eleven (11) were unsheltered sleeping in vehicles. Twenty (20) families with children were living in shelters and the remaining eight were placed in hotels by one of the CoC agencies. In addition, there are currently twenty-four (24) homeless youth in our community. These are youth ages 16-24 who are not with parents. Some are singles (or part of a couple) while others have children of their own. • There are an estimated 2,400 children that are considered homeless within the Rockford School District (RPS205). • There has been an uptick in the transient homeless population that consists mostly of individuals who were released from the Department of Corrections or a variety of mental health institutions.
3	Priority Need Name	Community Development Strategy
	Priority Level	High

	<p>Population</p> <p>Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development</p>
<p>Geographic Areas Affected</p>	<p>Non-targeted for Low-Mod Individual Benefit and Administration CDBG Eligible Areas</p>
<p>Associated Goals</p>	<p>CDS-1 Non-Housing Community Development Needs CDS-2 Public Services CDS-3 Clearance/Demolition</p>
<p>Description</p>	<p>There is a need to improve public facilities, such as parks, playgrounds, recreational areas, and trails. Improvements are needed on infrastructure such as bike trails, shared-use paths, roads, various transportation facilities and sidewalks, including ADA curb cuts. Flood mitigation is needed on roadways and neighborhoods. In addition, there is a need for improved access to public transit.</p>

	Basis for Relative Priority	The following sources were used to determine the Non-housing Community Development Needs: housing needs survey; agency needs surveys; interviews with City staff, City of Rockford Department of Community and Economic Development, Public Works and Engineering, Rockford Housing Authority, and other City agencies; and public hearing comments on needs. Additionally, the 2040 City of Rockford Comprehensive Plan and the City of Rockford, IL Housing Needs Assessment and Market Study 2023-2032. See NA-50 for additional details.
4	Priority Need Name	Economic Development Strategy
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Non-targeted for Low-Mod Individual Benefit and Administration CDBG Eligible Areas

	Associated Goals	EDS-1 Business Support EDS-2 Property Development
	Description	There is a need to have efficient business development, expansion, diversification, job growth, and innovation. In addition, there is a need to support sustainable and equitable economic development.
	Basis for Relative Priority	Businesses continue to report a need for stronger soft skill workforce training, such as attendance, punctuality, workplace communication, and attachment to cellular devices. In addition, there is a potential loss of industry knowledge as legacy workers retire, and Rockford has a lower percentage of working age individuals with college degrees. Rockford also must address issues connected to employment such as childcare, transportation, and housing. The American Community Survey 2022 - 5 Year Estimate states Rockford's unemployment rate at 9%, higher than the State of Illinois', which is 4.7%. See MA-45 for additional details.
5	Priority Need Name	Administration, Planning, and Management
	Priority Level	High

Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
Geographic Areas Affected	Non-targeted for Low-Mod Individual Benefit and Administration CDBG Eligible Areas
Associated Goals	AMS-1 Overall Coordination
Description	There is a need for planning, administration, management, and oversight of Federally funded programming.
Basis for Relative Priority	Funding is necessary to plan and carry out projects/activities described throughout this Five-Year Consolidated Plan.

Narrative (Optional)

The needs mentioned throughout the Consolidated Plan Market Study and Needs Analysis far exceed the Community Planning and Development resources (CDBG, HOME, ESG) that are anticipated to be available over the next five years to meet those needs. Therefore, the City continues to develop relationships with, and strengthen the capacity of, cross-sector partners so they may apply for grants for which the City can issue Certificates of Consistency to the City's Consolidated Plan. This is why some goals within the Priority/Strategies in the Table do not appear to be funded.

All Priorities/Strategies are marked as "High" Priority because the City plans to fund at least one or more of the corresponding goals over the next 5 years.

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

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The City of Rockford Department of Health and Human Services can assist with one month of rent assistance for tenants in order to prevent homelessness, or for individuals whose homes have been condemned.
TBRA for Non-Homeless Special Needs	The City of Rockford Department of Health and Human Services can assist with one month of payments for individuals whose homes have been condemned.
New Unit Production	There are numerous vacant sites in residential areas that the City can utilize for new infill housing construction and for new rental construction. New construction will permit the design of housing that is accessible for the special needs populations. However, cost is a factor. Resources are limited, so only a finite amount of new housing units can be produced.
Rehabilitation	There is a significant need to rehabilitate housing in the City of Rockford. The City needs affordable, accessible, decent, safe, and sanitary housing that could be accomplished through rehabilitation. However, cost is a factor, and is driven up by the Illinois Historic Preservation Authority (IHPA) guidelines. Resources are limited, so only a finite amount of housing units can be rehabilitated.

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Acquisition, including preservation	<p>The City has developed guidelines for historic preservation that can be found in the City Zoning Ordinance and Historic Guidelines for each one of these districts. These are:</p> <ul style="list-style-type: none"> • Haight Village • Garfield Avenue • Indian Terrace • Brown's Hill/Knightsville • Northeast State & Main • Peacock Brewery <p>In addition, the City also has districts listed on the National Register of Historic Places. These are:</p> <ul style="list-style-type: none"> • East Rockford • Haight Village • 7th Street Commercial • Barber-Colman Company • West Downtown Rockford • Garrison-Coronado-Haskell <p>Rockford has a local Historic Preservation Commission that provides proactive and practical guidance and resources to preserve structures and neighborhoods of historic significance.</p>

Table 4 – Influence of Market Conditions

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

Introduction

Estimated FY 2025 funding levels of \$2,219,358 for Community Development Block Grant (CDBG) funds, \$928,634 in HOME Investment Partnerships Program (HOME) funds, and \$192,497 for Emergency Solutions Grant (ESG) funds are based on 2024 funding levels and are contingent on the final approval of the Federal FY 2025 budget. Therefore, budget amendments are anticipated and will be made to the budget once actual allocations are announced by the Department of Housing and Urban Development (HUD). Any increases or decreases in funding are applied to projects in need or slow moving, respectively.

Each year, due to the time of awards, the City reserves the rights to incur pre-award costs.

Generally, each year the City budgets Community Housing Development Organization (CHDO) operating funds. If they are not requested or committed by the end of the calendar year they are automatically moved to the HOME Housing Development Project. For definitions and processes followed for minor and substantial budget amendments, see the attached City's Citizen Participation Plan.

The statements above are current practices and may change throughout the Five-Year Consolidated Plan period. Should changes occur, it will be announced during the City's Citizen Participation process for the annual action plans. A change in any of the above statements do NOT constitute a substantial amendment for the Five-Year Consolidated Plan.

The City's fiscal year is from January 1 to December 31. See the Tables below to see how CDBG, HOME, and ESG funds are anticipated to fund the City's priority needs mentioned throughout the Five-Year Consolidated Plan and Annual Action Plan. The accomplishments of these projects/activities are reported in the City's corresponding Consolidated Annual Performance and Evaluation Reports (CAPER).

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,219,358	0	0	2,219,358	8,877,432	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	928,634	0	0	928,634	3,714,536	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	192,497	0	0	192,497	769,988	

Table 5 - Anticipated Resources

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

The City leverages entitlement and other public dollars with private, state, and local resources. They include, but are not limited to, the following:

Public:

- United States Environmental Protection Agency
- Department of Commerce & Economic Development - Community Services Block Grant
- Department of Commerce & Economic Development – Low income home emergency assistance Program
- Department of Housing and Urban Development Continuum of Care-Homeless Assistance
- Department of Energy - Weatherization Assistance Program

In addition, the City of Rockford is eligible to submit applications to HUD for five times the current CDBG entitlement for application of Section 108 Loan Guarantee funds. Section 108 can be used to fund

economic development, housing, public facilities, infrastructure, and other physical development projects, including improvements to increase resilience against natural disasters.

Private:

- Community Solutions – private foundation funds for the housing and wrap-around services needed to house severely mentally ill homeless persons.
- Winnebago County Mental Health Board (WCMHB) —private foundation funding for services for severely mentally ill and unsheltered persons
- Housing rehabilitation - If the cost of rehabilitation exceeds the City's program maximums, property owners invest their own funds, obtain available grants from local agencies or seek loans from a financial institution.
- Homeownership assistance is gap financing. Therefore, first mortgage financing and homebuyer assistance is often provided by mortgage lenders. Some homebuyers may qualify for additional homebuyer assistance through a Federal Home Loan Bank of Chicago housing program. In addition, most homebuyers are required to invest their own savings.
- The City can supplement housing rehabilitation programs with other competitive grants through the Federal Home Loan Bank of Chicago (FHLBC). Traditionally, competitive grant applications are accepted annually.
- The City's assistance provides gap financing for developers. Therefore, developers may seek bridge loans, additional gap financing, and/or permanent financing from financial institutions, the Federal Home Loan Bank of Chicago (FHLBC), 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 plans to continue seeking competitive grant funding through the Illinois Housing Development Authority (IHDA) for housing and community development. Currently, the City has three (3) types of funding streams from IHDA awards. They are as follows:

- Home Repair and Accessibility Program (HRAP)
- Homeowner Assistance Fund HOME Repair (HAFHR)
- Strong Communities Program (SCP)

In addition, IHDA provides the following:

- Homeownership programs through approved local financial institutions. This includes first mortgage financing along with homebuyer assistance, and/or reduced interest rates.
- Development assistance provided in the form of soft costs/gap financing for developments.

Local:

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

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

HOME and ESG Match Requirements:

The City's HOME match requirement of 25% continues to be met. As of December 31, 2023, the City reported in the 2023 CAPER an excess amount of \$1,117,948. The match requirement is generally met through housing developments. However, the City does report other match funds as they become available. For homeownership, this might be volunteer labor on a Habitat home that was purchased using the City's homeownership program. For housing rehabilitation projects, this could include capital improvement completed in the area.

Generally, the ESG match requirements are met by a combination of any of the following:

- Local funds
- State funds
- Sub-grantee donations
- Sub-grantee grants
- Sub-grantee in-kind non-cash contributions such as goods, services, equipment, or real property that are given to the ESG program.

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

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

Discussion

N/A

SP-40 Institutional Delivery Structure – 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Rockford	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	Jurisdiction
Rockford Housing Authority	PHA	Planning Public Housing	Jurisdiction
Winnebago County Housing Authority	PHA	Planning Public Housing	Region
Northern Illinois Homeless Coalition	Continuum of care	Homelessness Planning	Region

Table 6 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The institutional delivery system for the City of Rockford is well coordinated and spans a range of community needs. Years ago, efforts were made to “break down silos” between agencies in order to improve and streamline communication by reducing duplicative work. Overall, this initiative has been successful.

The City has many years of experience managing and implementing the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG) programs, as well as working with outside agencies that fill some of the needs as outlined in this Five-Year Consolidated Plan that are not under the purview of the services offered by the City. The Northern Illinois Homeless Coalition/Continuum of Care (CoC) works together with the City's Health and Human Services Department/Community Action Agency to administer ESG funds. CoC and ESG funds are awarded to agencies providing social services to homeless persons. CDBG and HOME programs are generally administered through the City's Community and Economic Development Department using

City staff. The Rockford Housing Authority and the Winnebago County Housing Authority administer public housing government resources. Both have not-for-profit arms that develop housing.

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

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

Table 7 - Homeless Prevention Services Summary

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

The services targeted to homeless persons and persons with HIV/AIDS and mainstream services are made available through the coordination of services provided through the Continuum of Care member agencies. These agencies partner with each other, the City, and mainstream service providers to provide a wide-ranging response to the service needs of homeless persons and persons with HIV/AIDS,

particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth.

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

The Northern Illinois Homeless Coalition participates in Built for Zero, a nationwide Community Solutions Initiative to end homelessness. Rockford has reached the “functional zero” criteria for veterans and those who are chronically homeless. This means that 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. In addition, service providers rapidly rehouse newly homeless veterans and new chronically homeless in less than 30 days.

Although this is the case for veterans and chronically homeless, the City has not met “functional zero” for families, youth, and single adults, hence the main Goal of the Homeless Strategy over the Five-Year Consolidated Plan period.

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

1. Continue to work with non-profit organizations to address community needs and provide support to federal and non-federal funding initiatives ongoing and as needed.
2. Continue to work with private industry to address important issues that slow down or duplicate housing and community development efforts by the City of Rockford and partner agencies.
3. Identify opportunities to create private/public partnerships for project finance and development to leverage federal funds continually and on as needed basis.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	HS-1 Housing New Construction	2025	2029	Affordable Housing Non-Homeless Special Needs	City Wide CDBG Eligible Areas	Housing Strategy	HOME: \$1,950,131.40	Homeowner Housing Added: 15 Household Housing Unit
2	HS-2 Preservation of Housing	2025	2029	Affordable Housing Non-Homeless Special Needs	City Wide CDBG Eligible Areas	Housing Strategy	CDBG: \$2,935,257 HOME: \$1,300,087.60	Rental units rehabilitated: 10 Household Housing Unit Homeowner Housing Rehabilitated: 42 Household Housing Unit
3	HS-3 CHDO Support & Development	2025	2029	Affordable Housing Non-Homeless Special Needs	City Wide CDBG Eligible Areas	Housing Strategy	HOME: \$928,634	Homeowner Housing Added: 5 Household Housing Unit Other: 5 Other
4	HS-4 Homeownership	2025	2029	Affordable Housing Non-Homeless Special Needs	City Wide CDBG Eligible Areas	Housing Strategy	CDBG: \$400,000	Direct Financial Assistance to Homebuyers: 80 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	HS-5 Fair Housing	2025	2029	Affordable Housing Non-Homeless Special Needs	City Wide CDBG Eligible Areas	Housing Strategy	CDBG: \$50,000	Other: 5 Other
6	HS-6 Project Delivery	2025	2029	Affordable Housing Non-Homeless Special Needs	City Wide CDBG Eligible Areas	Housing Strategy	CDBG: \$1,767,175	Rental units rehabilitated: 10 Household Housing Unit Homeowner Housing Added: 20 Household Housing Unit Other: 5 Other
7	HMS-1 To Reach Functional Zero	2025	2029	Homeless	City Wide CDBG Eligible Areas	Homeless Strategy	ESG: \$962,485	Other: 25 Other
8	CDS-1 Non-Housing Community Development Needs	2025	2029	Non-Housing Community Development	City Wide CDBG Eligible Areas	Community Development Strategy	CDBG: \$1,600,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 6000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	CDS-2 Public Services	2025	2029	Non-Housing Community Development	City Wide CDBG Eligible Areas	Community Development Strategy	CDBG: \$0	
10	CDS-3 Clearance/Demolition	2025	2029	Non-Housing Community Development	City Wide CDBG Eligible Areas	Community Development Strategy	CDBG: \$1,500,000	Buildings Demolished: 30 Buildings
11	EDS-1 Business Support	2025	2029	Non-Housing Community Development	City Wide CDBG Eligible Areas	Economic Development Strategy	CDBG: \$625,000	Businesses assisted: 25 Businesses Assisted
12	EDS-2 Property Development	2025	2029	Non-Housing Community Development	City Wide CDBG Eligible Areas	Economic Development Strategy	CDBG: \$0	
13	AMS-1 Overall Coordination	2025	2029	Administration		Administration, Planning, and Management	CDBG: \$2,219,358 HOME: \$464,317	Other: 10 Other

Table 8 – Goals Summary

Goal Descriptions

1	Goal Name	HS-1 Housing New Construction
	Goal Description	Increase the number of housing units in the City for owners and renters through new construction. This includes, but is not limited to, costs associated with acquisition, disposition, clearance, demolition, infrastructure, and new construction of residential housing.
2	Goal Name	HS-2 Preservation of Housing
	Goal Description	Preserve existing housing units in the City for owners and renters. This includes, but is not limited to, costs associated with acquisition, disposition, clearance, demolition, infrastructure, and the rehabilitation of residential housing.
3	Goal Name	HS-3 CHDO Support & Development
	Goal Description	Support Community Housing Development Organizations with operating dollars and development funds. This meets the HOME program 15% minimum set aside requirement for affordable housing. Funds would be used for the development of decent, safe, and sanitary housing for owners and renters. This includes, but is not limited to, costs associated with acquisition, new construction, reconstruction, and the rehabilitation of residential housing. In addition, eligible homebuyers purchasing any of the newly developed units may receive homebuyer assistance such as down payment, etc.
4	Goal Name	HS-4 Homeownership
	Goal Description	Create wealth through homeownership. Assistance includes, but is not limited to direct subsidies for down payment, closing costs, housing counseling fees, interest subsidies, etc.
5	Goal Name	HS-5 Fair Housing
	Goal Description	Promote fair housing choice through education, testing, training, and outreach in the City of Rockford.
6	Goal Name	HS-6 Project Delivery
	Goal Description	Support housing through project delivery; the comprehensive process of carrying out and completing housing units.
7	Goal Name	HMS-1 To Reach Functional Zero for Families, Youth, and Single Adults
	Goal Description	Supplement the Continuum of Care's efforts by identifying and engaging people at risk of and experiencing homelessness, intervening to prevent the loss of housing and divert people from entering the homelessness services system, and providing immediate access to shelter and crisis services. This includes, but is not limited to, efforts related to street outreach, emergency shelter, homeless prevention, rapid re-housing, operating, supporting the Homeless Management Information System (HMIS), and administration.

8	Goal Name	CDS-1 Non-Housing Community Development Needs
	Goal Description	Improve public facilities, infrastructure, and public safety. This includes, but is not limited to, rehabilitation, reconstruction, and new construction of community spaces and infrastructure such as streets, sidewalks, bridges, curbs, storm water & sanitary sewer, accessibility improvements, the removal of architectural barriers, community policing, and ability to respond to emergencies in the City, etc.
9	Goal Name	CDS-2 Public Services
	Goal Description	Supplement public services (including labor, supplies, and materials) for low to moderate-income persons, including persons with other special needs. This includes, but is not limited to adding new services or making a quantifiable increase in the level of existing services for services such as employment, crime prevention, childcare, health, drug abuse, education, fair housing counseling, energy conservation, welfare, or recreational needs.
10	Goal Name	CDS-3 Clearance/Demolition
	Goal Description	Remove and eliminate slum and blighting conditions through demolition of vacant, abandoned, and dilapidated structures.
11	Goal Name	EDS-1 Business Support
	Goal Description	Provide financial support to start and/or grow businesses.
12	Goal Name	EDS-2 Property Development
	Goal Description	Develop new and existing commercial and industrial properties through means such as acquisition, disposition, clearance, demolition, remediation, preservation, renovation, etc.
13	Goal Name	AMS-1 Overall Coordination
	Goal Description	Provide program management and oversight for the successful administration of Federal programming, 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.

Table 9 – Goal Descriptions

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

The City anticipates assisting 152 households through the various housing programs funded by CDBG or HOME during FY 2025-2029. This includes all of the various “Household Housing Unit” and “Households Assisted” totals found in Goals Summary Table above except for HS-6 Project Delivery.

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

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

Rockford Housing Authority currently operates a total of 1,923 public housing units HUD requires that a minimum of 5% of Public Housing Units must be accessible; currently 11.2% of the Housing Authority of Rockford's units are accessible. The current waiting list for Elderly/disabled housing is 570 applicants. It is the policy of the Rockford Housing Authority that, "Newly constructed facilities must be designed to be readily accessible to and usable by persons with disabilities. Alterations to existing facilities must be accessible to the maximum extent feasible, defined as not imposing an undue financial and administrative burden on the operations of the public housing program."

Activities to Increase Resident Involvements

The Rockford Housing Authority (RHA) has several opportunities for resident involvement.

They are as follows:

- **Housing Occupants Mobilization Effort (HOME):** HOME is an organization that has the responsibility of working with RHA and Resident Leadership Councils (RLCs) for the good of all. It is comprised of RHA residents elected from RLCs. The HOME Board addresses issues which affect the quality of life of public housing residents. The HOME/RAB is the governing agency of all RHA's RLCs. HOME/RAB Executive officers, in partnership with appropriate RHA staff, assist RLCs and residents at each site with the organization and functioning of the RLCs. RHA staff provides technical assistance to the HOME/RAB and RLCs to ensure compliance with HUD guidelines and requirements.
- **Resident Leadership Councils (RLCs):** RLC's serve as tenant organizations for a development or a building of RHA-managed property. The principal purposes of the RLC are as follows:
 - 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 (Resident Advisory Board) and RHA staff.
 - Aid in determining the needs of each development or building.
 - Provide a forum for sharing of information about RHA and its programs and offerings.
 - Make reformations to the development of the RHA capital and annual plans.
- **RHA Family Self-Sufficiency (FSS):** RHA encourages residents to participate in FSS programming which breaks down into four (4) different paths. These are ReBuild, ReStart: Empowerment & Life Skills

Building, Rethink: Educational Development & Networking, and Recreate: Special Programs and Initiatives. Each of these tracts offer unique programming to fit the needs of the resident. ReBuild: helps Residents reach short- and long-term 176 goals to become self-sufficient. Residents receive direct services assistance, service coordination, and case management. ReStart: Empowerment & Life Skills Building focuses on Personal Empowerment & Goals, Health & Wellness, Housekeeping & Independent Living, and Parenting & Early Learning. ReThink: Educational Development & Networking focuses on Financial Education & Planning, Employment & Education, Digital Literacy, Leadership Development, and Homeownership. Recreate: Special Programs and Initiatives has special programs and initiatives such as ConnectHome, New Mix & Craft Entrepreneurship, and Resident Leadership Council.

- Resident Opportunities for Self-Sufficiency (ROSS): The ROSS program works closely with individual work plans related to employment, education, and strategies to reduce and eliminate subsidy assistance. A team of ROSS Case Managers work closely with residents to develop work plans to meet individual goals and they connect residents with local agencies and services that provide additional supportive services and resources needed to achieve success

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

No

Plan to remove the ‘troubled’ designation

Not Applicable

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

Barriers to Affordable Housing

The City of Rockford in its most recent Analysis of Impediments to Fair Housing Choice identified that the City of Rockford does not have a definition for “disabled” or “handicapped” in the general terms of the zoning code. There were no other negative effects of its public policies identified that would serve as barriers to affordable housing. The City has continued to revise and update its Zoning Ordinance, the most recent update being July 1st 2024.

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

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

Below are some additional barriers that are for the most part out of the control of the City:

- Lack of affordable housing and continued rental cost rise, often over fair-market rent value
- Although rents are on the rise, the condition of the apartments are not following suit.
- Landlords hesitant to take on renters with vouchers, and landlords needing more support from a collaborative case management team.
- Landlords making criteria more difficult for people to get into units, increasing income amounts needed, more in depth look at credit, etc. They have also increased the amount of “fees” (application, processing, move-in), double deposits, first/last months’ rent.
- Additionally, there remains a long wait list to receive vouchers.

See section *MA-40 Barriers to Affordable Housing* for impediments from the Analysis of Impediments.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

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

HHS has been funded by Community Solutions to employ a Landlord Engagement Specialist. This position is responsible for creating and maintaining a list of units available, meeting with landlords to explain CoC programs and engage them in working with the City and cross sector partner agencies, and to look for funding to fill any gaps in services. A survey was conducted with landlords to see what they

felt were the largest barriers to working with programs. They overwhelmingly discuss the lack of communication or a set person to contact, tenants moving in without necessities (cleaning supplies, toiletries, furnishings), and lack of consistent follow up when issues arise. In response to this, a landlord “hotline” will be put into effect in January 2025 so there is always a direct contact. Resource mapping was completed to find funding for move-in necessities. Additionally, it was found that it is difficult to get timely inspections of units for tenants to move in quickly. Therefore, the landlord engagement specialist completed and is now certified in NSPIRE inspections, which will help speed this up.

The City has evaluated the progress above, and met with partners to discuss what still needs to be accomplished. This analysis will conclude that we will continue to focus on these impediments and momentum created under them for the next 5-year plan period.

The City of Rockford's FY 2025-2029 Analysis of Impediments to Fair Housing Choice has identified the following impediments and actions to be taken to address these impediments:

- **Impediment 1: Fair Housing Education and Outreach.** There is a need to educate persons about their rights under the Fair Housing Act and to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities and the disabled population who fear retaliation if they lodge a complaint.

Goal: The public in general and local officials will become knowledgeable and aware of the Fair Housing Act, related laws regulations, and requirements to affirmatively further fair housing in the City. In addition, the City will support fair housing testing, which will identify and investigate illegal housing discrimination.

Strategies:

1-A: Promote Fair Housing awareness through media, seminars, testing, and training to provide educational opportunities for all persons to learn more about their rights under the Fair Housing Act and the Americans with Disabilities Act

1-B: Provide literature and informational material concerning fair housing issues, an individual's housing rights, and landlord's responsibilities to affirmatively further fair housing.

1-C: Promote housing choice so residents with the same financial means may choose to live anywhere in the City, using media and seminars to educate tenants and landlords on Section 8 vouchers and source of income discrimination.

1-D: Provide fair housing education and outreach to seniors and people with disabilities to address fear of reporting housing and code violations.

1-E: Promote and advocate for fair housing testing.

- **Impediment 2: Need for Decent, Safe, and Affordable Rental Housing.** The City of Rockford does not have a sufficient supply of rental housing that is decent, safe, and sound. In many cases, landlords often do not maintain their property to code standards which results in unsafe living conditions for tenants. However, the monthly cost of rent for apartments has steadily increased due to the limited supply of rental housing, despite the condition of the rental unit.

Goal: Increase the supply of affordable rental housing in the City of Rockford, through new construction, adaptive reuse of commercial and industrial buildings, preservation of existing structures with affordable unit set-asides, and the development of mixed-income buildings.

Strategies:

2-A: Support and advocate for both private developers and non-profit housing providers to develop and construct new affordable, mixed income, and middle-income rental housing throughout the City of Rockford.

2-B: Support and advocate for both private developers and non-profit housing providers to develop and construct new affordable, mixed income, and middle-income rental in vacant commercial and industrial structures.

2-C: Support and advocate for both private landlords and non-profit housing providers to rehabilitate existing housing units in the City to create decent, safe and sound rental housing that is affordable to lower income households.

- **Impediment 3: Lack of Affordable Homeownership Opportunities.** Referencing Census data, the population of Rockford has remained relatively stable between 2010 and 2020 decreasing by about 4,200 people or -3%. However, the population is projected to increase due to regional growth factors mainly related to current and planned job growth. Therefore, it is expected that the number of new dwelling units needed to handle this growth is between 3,200 and 9,100 units by the year 2032. Renter-occupied units have increased from 39.5 percent in 2010 to 45.8 percent in 2019. In contrast, owner-occupied units have decreased from 60.5 percent in 2010 to 54.2 percent in 2019.

Today the biggest issue facing affordable home ownership opportunities are availability and cost. In 10 years, the average price of a home in the Rockford area has more than doubled. An average home in Rockford would cost you just over \$88,000 in 2014 while in June of 2023 the same home on average would cost just over \$198,000. As of June 2024, the median price of a home in Rockford was \$155,377, a 17.9% increase from the previous year.

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

Strategies:

3-A: Support and advocate for both private developers and non-profit housing providers to develop and construct new affordable housing that is for-sale.

3-B: Support and advocate for the acquisition, rehabilitation and resale of existing housing units to become decent, safe and sound.

3-C: Support and provide funds for down payment assistance to lower-income households to become homeowners.

3-4: Support homebuyer education and training programs to improve homebuyer awareness and increase the opportunities for lower-income households to become homebuyers.

- **Impediment 4: Need for Accessible Housing Units That Are For-Sale or Rent.** There is a lack of accessible housing units in the City of Rockford. Most of the existing housing units do not have accessible features. The City's disabled population has grown to 32% of the total population.

Goal: Increase the number of accessible housing units through new construction and rehabilitation of existing housing units for disability needs.

Strategies:

4-A: Support home rehabilitation programs that financially assist seniors and people with disabilities to provide a safe and accessible home.

4-B: Support and encourage the development of accessible housing units in the City of Rockford.

4-C: Enforce the ADA and Fair Housing requirements for landlords to make “reasonable accommodations” to their rental properties so they become accessible to tenants with disabilities.

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

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

Strategies:

5-A: Support and enhance workforce development and skills training that result in a “livable wage” and increases job opportunities.

5-B: Continue to provide support, education, and technical assistance opportunities to minority, women owned and small businesses.

5-C: Continue to promote and encourage economic development with local commercial and industrial firms to expand their operations and increase employment opportunities.

5-D: Support and encourage efforts for improvements in public transportation options in the City to allow for employees to access housing of choice without worry of getting to work.

5-E: Support and encourage private and non-profit developers and businesses to provide assets (grocery stores, services, etc.) in low-to-moderate income neighborhoods.

SP-60 Homelessness Strategy – 91.215(d)

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

The City of Rockford is a Built for Zero community, and has reached functional zero for veterans and chronic homelessness. Functional Zero means that the Rockford community will have a systematic response in place that ensures homelessness is prevented whenever possible, or if it cannot be prevented, it is a rare, brief, and non-reoccurring experience. The Rockford community will have the capacity to:

- Quickly identify and engage people at risk of and experiencing homelessness.
- Intervene to prevent the loss of housing and divert people from entering the homelessness services system.
- When homelessness does occur, provide immediate access to shelter and crisis services, without barriers to entry, while permanent stable housing and appropriate supports are being secured, and quickly connect people to housing assistance and services—tailored to their unique needs and strengths—to help them achieve and maintain stable housing.
- Re-house everyone within 45 days of identification

To accomplish this, the coalition has set the following goals:

- To reach functional zero for families by June 30, 2025
- To reach functional zero for youth by December 31, 2025
- To reach functional zero for single adults by July 31, 2026

The City of Rockford will leverage its ESG funding, along with other federal and state grants, to work with its partner agencies towards these goals.

Street outreach is conducted by the City of Rockford HHS and has changed significantly over the last several years. Outreach is conducted daily on weekdays and at least once a week at nighttime. The outreach provider gathers specific locations from homeless individuals, citizens, businesses, police reports and any other sources. Outreach staff use that information to go to the locations during the day and in the nighttime. These visits are for multiple purposes including to verify homeless status but also to engage with clients, build relationships, provide resources, check on the well-being of the people who are unsheltered, to assess individual needs, and to offer housing options. Locations where people are known to frequent are checked on a regular basis to look for new people or to continue working on engaging with those who are harder to reach. If outreach staff are not "connecting" with clients, staff is rotated to see if someone else can somehow build a better relationship. If staff is still unable to engage with people, partners from other agencies see if they can engage the person in services.

Addressing the emergency and transitional housing needs of homeless persons

The City will continue its Housing First emphasis, using Coordinated Entry for all persons who need emergency and transitional housing solutions.

The City of Rockford HHS is the Coordinated Entry (CES) location for Rockford (Winnebago & Boone Counties). We use a single point of entry for a physical location but also have a 24/7 emergency hotline to reach everyone in our service area. Staff is able to do client assessments in person at the office, during outreach, or over the phone. At that time, it is determined what services are needed right away. Referrals are made to shelters, soup kitchens, or medical programs to meet immediate needs. At that time, people are placed onto the by-name list to wait for a permanent housing placement that will work for them. Clients are prioritized based on the CES policy; those who have been homeless the longest and have the highest service needs do get priority within our housing system. In addition, CES does case conferencing and works closely with partner agencies to identify those with the highest needs and work together on housing plan. Monthly mental health and homelessness committee is one example of this partnership. This group meets monthly to discuss those unsheltered individuals who have the most serious mental health needs and look for housing options for them. In many cases, these individuals are too ill to reside in our CoC programs and need a higher level of care, which is very hard to get into.

The CES (usually in cooperation with partners through case conferencing), generally lay out the options that a person is eligible for. Those options are discussed and people are able to state what they would like to do. When there is an option available for that individual/family, it is offered to them. CES refers them to the housing program, and then the person can speak with the program manager to see if it fits with their preferences. They always have the option to turn it down, if they want. Staff will encourage people to move into housing as soon as possible.

The CES uses the housing first model, which has low barriers, and is client-centered (they don't have to answer or give information they are not comfortable with, choice in services they want/housing choice). The CES does not force participant to have IDs/documents in order to be eligible (will help them obtain documents if they need them). CES staff will help connect to services, such as transportation, mental health assessments, medical care. CES helps with housing navigation and completing applications.

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.

It is the goal of the City of Rockford HHS/CoC agencies to get people from homelessness to permanent housed as quickly as possible. CES staff work with the family/individual to find a place that they are comfortable with and that they can afford. CES staff assists clients in completing applications for subsidized housing or housing assistance programs, if that is needed. Then case managers from the housing program assist to make sure they have a smooth transition-ensuring that they have utilities (if needed), basic furniture and necessities for the unit, and any services to be successful.

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

The City of Rockford HHS is a Community Action Agency that has ongoing services available for the homeless and those who may be at-risk of homelessness. There are specific state grants that can be used to keep people from falling into homelessness. HHS has some agreements in place with systems of care. Specifically, the state foster care system contracts with HHS to ensure that youth aging out of the foster care system have services in place to help them with housing.

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

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

As noted in previous plans, 75% of the housing stock in the City was built before 1975. The City complies with Title 24 Part 35: Lead-Based Paint Poisoning Prevention in Certain Residential Structures (Current Rule).

The City's Residential Property Inspector is a certified Lead Assessor and develops all appropriate Work Item Lists with appropriate lead processes identified (interim controls or abatement). Through our procurement policy, the City has secured agreements with a private contractor and Winnebago County Health Department to perform lead risk assessments and lead clearances. The City has identified a policy and procedure that ensures that the residents we serve are properly informed and protected when lead may be or has been identified as present.

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

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

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

Lead reduction involves the implementation of 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 the Health Homes Production Grant from HUD. This program is funded to mitigate lead hazards for low-to-moderate income owner-occupied or rental homes in the region. The City recognizes the importance of addressing lead-based paint hazards and will continue to support partners with and/or apply for additional resources to support these efforts.

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

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

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

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

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

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 provides supportive assistance to small businesses looking to add new jobs.

Over the next five (5) years, the City plans to use City resources, including CDBG funds, for the following anti-poverty programs:

- Assist in job creation and retention
- Small business assistance
- Commercial/industrial infrastructure development and redevelopment
- New commercial/industrial development

The Mayor also participated in Bridges to Prosperity Northern Illinois' launch of their Upward Mobility planning process. This local non-profit has working groups filled with community members who are looking at five pillars of support that will help households move into economic stability. City staff will continue to participate and advocate for the work being championed and completed by this agency.

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

Increasing the supply of affordable housing and housing choice is integrally tied to these goals. As residents look to secure and/or improve employment, they need to have stable housing with access to transportation to work. The City will continue to work with partners providing workforce development programs and assisting entrepreneurs and small businesses, so that the development of units in opportunity areas for these employees is promoted.

SP-80 Monitoring – 91.230

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

Long-Term Monitoring and Compliance:

Monitoring Community Planning and Development Programs, specifically the CDBG, and HOME Programs, begin with having policies and procedures in place to guide the City's Community & Economic Development Department (CEDD) Neighborhood Development Division and Economic Development Division staff when administering programs. Staff follows these programmatic procedures to ensure that regulations are met from the time an application through Neighborly, the City's online application system, is submitted through reporting on activity accomplishments in IDIS (HUD's Integrated Disbursement and Information System). City staff underwrites recipients based on the assistance being provided, prior to explaining in detail and fully executing an agreement.

There is a clear separation of duties when disbursing funds; e.g., IDIS users are only able to fund or draw. Funding procedures contain several levels of approval for due diligence, including staff in the Purchasing/Central Services division of the City's Finance Department (FD).

Besides IDIS, staff uses MUNIS, the City's internal financial system, other spreadsheets, and activity files for monitoring compliance. Generally, funds are disbursed incrementally, giving staff another opportunity to monitor activity progress. Depending on the type of activity, this may include collecting accomplishment data, inspecting construction work to ensure property standards and appropriate mitigation measures are being followed, approving change orders, etc.

The City's FD ensures that audits are completed by a Certified Public Accountant annually in accordance with 2 CFR Part 200. An audit notice is completed for HUD and the final audit is made public through the Federal Audit Clearing House. CEDD compliance staff follow procedures that base the level and frequency of monitoring on the assistance type and the requirements specified in the funding agreements.

Systems are in place to remind staff of compliance due dates related to recipients such as, when to collect annual reports, when to conduct onsite property inspections and onsite monitoring of rents and/or income qualifications, when to mail annual privacy policy notices that assist with monitoring HOME residency requirements, and when to release collateral on loans that have been satisfied. For grant administrative purposes, compliance due dates include, but are not limited to, submitting Federal and State funding reports, timeliness tests, grant closeouts, when staff should resign privacy policy and conflict of interest statements, when HUD plans are due, and when local Rockstat, a public semi-annual progress report to senior leadership, is due.

In addition, staff continuously reviews and updates the City's policy and procedure making sure all Federal, State, Local rules and regulations are followed, reviews files, ensures that appropriate data is collected and reports are submitted timely, etc. Besides the CEDD staff, the City's Legal Department (LD) and Finance Department (FD) assist the compliance team with monitoring and compliance. A Contract and Grant Compliance Officer (Officer) within LD, works directly with CEDD compliance staff to monitor grant, agreements, and contracts compliance. This position provides oversight on reporting metrics and policy. The Officer supports contractors seeking technical assistance with Davis Bacon and/or Section 3 requirements, as well. Additional LD staff assistance includes, but is not limited to interpreting regulations, formalizing procedures and agreements, reporting, and handling court proceedings when necessary.

FD supports CEDD by reporting expenditures to HUD, balancing HUD grants on a monthly basis, approving vouchers reported to HUD, and year end balancing. Additional FD assistance includes, but is not limited to processing payouts and audits. The Central Services/Purchasing portion of the Finance Department, assists with sending out bids, Requests for Proposals and ensuring all responders meet the City's regulations.

Health & Human Services housing staff ensure that the federal funds are being allocated properly, per the program regulations. Once responses to the City Request for Proposal are received, housing staff review the applications and ensure that all applications meet the HUD regulation standard. The applications are then reviewed by a committee comprised of housing staff and Continuum of Care (CoC) members. A recommendation is then made to the CoC Board. Following CoC Board review, a formal recommendation is made to City Council. ESG recipient costs are scrutinized monthly by both program and fiscal staff to ensure appropriate, eligible expenditures are being made. In addition, monitoring of projects is conducted annually with year one being a full review and year two being a desk review. The City utilizes the HUD monitoring guides as templates for monitoring sub recipients. Sub recipients receive written feedback consistently throughout the process and at the end of monitoring. They are provided technical assistance to help them overcome any monitoring deficiencies. City staff meets the comprehensive planning requirements by following HUD guidance, which includes public participation. See Attached Citizen Participation Plan.

Minority Business Outreach:

The City of Rockford (City) encourages the use of Minority and Women Business Enterprises (MBEs/WBEs). Generally, outreach efforts include the following:

The promotion and encouragement of minority and women-owned businesses and their participation in the City's procurement process as general contractors, subcontractors, and suppliers of goods and services.

The City's purchasing staff seeks quotes under \$25,000 from Minority- and Women- Owned Businesses that are certified as MBEs/WBEs by the City's Contract and Grant Compliance Officer.

Businesses certified as MBEs and WBEs are on the City's website for internal purchasers and for the community-at-large to recruit MBEs and WBEs for contracting, subcontracting, products, and services. New MBEs and WBEs are added to this list after the City approves an application that the business owner submits.

Networking with local, state, federal, private agencies, and Rockford Public School District 205, reporting on bid opportunities and organizations to enhance the contractual opportunities for minority and women business development.

Administer the Procurement Policy approved by City Council that encourages the use of minority- and women-owned businesses in the City's procurement efforts. The City maintains a process for certifying businesses as MBEs/WBEs, and recognizes certifications from the Illinois Department of Transportation, Illinois Central Management Services, and the City of Chicago as part of this process. As part of bid requirements, each bidder on contracts or commodity purchases and for all road and building construction projects is required to identify each MBE and WBE subcontractor they will use on the contract, including the estimated dollar amount of the subcontract and the percentage to total bid that will be awarded to MBE and WBE subcontractors.

Continue engaging with organizations such as Miracle Mile Business Association, Illinois DCEO, Women of Today's Manufacturing, Illinois Small Business Development Center (SBDC), Transform Rockford: ACE Event, Rockford Regional Hispanic Chamber of Commerce, Think Big (a small business development nonprofit), etc. giving the City opportunity to encourage more MBE/WBE startups by providing business education and other resources to help individuals start, sustain, and grow their endeavors.

Annual Action Plan

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

Introduction

Estimated FY 2025 funding levels of \$2,219,358 for Community Development Block Grant (CDBG) funds, \$928,634 in HOME Investment Partnerships Program (HOME) funds, and \$192,497 for Emergency Solutions Grant (ESG) funds are based on 2024 funding levels and are contingent on the final approval of the Federal FY 2025 budget. Therefore, budget amendments are anticipated and will be made to the budget once actual allocations are announced by the Department of Housing and Urban Development (HUD). Any increases or decreases in funding are applied to projects in need or slow moving, respectively.

Each year, due to the time of awards, the City reserves the rights to incur pre-award costs.

Generally, each year the City budgets Community Housing Development Organization (CHDO) operating funds. If they are not requested or committed by the end of the calendar year they are automatically moved to the HOME Housing Development Project. For definitions and processes followed for minor and substantial budget amendments, see the attached City's Citizen Participation Plan.

The statements above are current practices and may change throughout the Five-Year Consolidated Plan period. Should changes occur, it will be announced during the City's Citizen Participation process for the annual action plans. A change in any of the above statements do NOT constitute a substantial amendment for the Five-Year Consolidated Plan.

The City's fiscal year is from January 1 to December 31. See the Tables below to see how CDBG, HOME, and ESG funds are anticipated to fund the City's priority needs mentioned throughout the Five-Year Consolidated Plan and Annual Action Plan. The accomplishments of these projects/activities are reported in the City's corresponding Consolidated Annual Performance and Evaluation Reports (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	2,219,358.00	0.00	0.00	2,219,358.00	8,877,432.00	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	928,634.00	0.00	0.00	928,634.00	3,714,536.00	

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: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	192,497.00	0.00	0.00	192,497.00	769,988.00	

Table 1 - 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 leverages entitlement and other public dollars with private, state, and local resources. They include, but are not limited to, the following:

Public:

- United States Environmental Protection Agency
- Department of Commerce & Economic Development - Community Services Block Grant
- Department of Commerce & Economic Development – Low income home emergency assistance Program
- Department of Housing and Urban Development Continuum of Care-Homeless Assistance
- Department of Energy - Weatherization Assistance Program

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

Private:

- Community Solutions – private foundation funds for the housing and wrap-around services needed to house severely mentally ill homeless persons.
- Winnebago County Mental Health Board (WCMHB) —private foundation funding for services for severely mentally ill and unsheltered persons
- Housing rehabilitation - If the cost of rehabilitation exceeds the City's program maximums, property owners invest their own funds, obtain available grants from local agencies or seek loans from a financial institution.
- Homeownership assistance is gap financing. Therefore, first mortgage financing and homebuyer assistance is often provided by mortgage lenders. Some homebuyers may qualify for additional homebuyer assistance through a Federal Home Loan Bank of Chicago housing program. In addition, most homebuyers are required to invest their own savings.
- The City can supplement housing rehabilitation programs with other competitive grants through the Federal Home Loan Bank of Chicago (FHLBC). Traditionally, competitive grant applications are accepted annually.
- The City's assistance provides gap financing for developers. Therefore, developers may seek bridge loans, additional gap financing, and/or permanent financing from financial institutions, the Federal Home Loan Bank of Chicago (FHLBC), 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 plans to continue seeking competitive grant funding through the Illinois Housing Development Authority (IHDA) for housing and community development. Currently, the City has three (3) types of funding streams from IHDA awards. They are as follows:

- Home Repair and Accessibility Program (HRAP)
- Homeowner Assistance Fund HOME Repair (HAFHR)
- Strong Communities Program (SCP)

In addition, IHDA provides the following:

- Homeownership programs through approved local financial institutions. This includes first mortgage financing along with homebuyer assistance, and/or reduced interest rates.
- Development assistance provided in the form of soft costs/gap financing for developments.

Local:

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

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

HOME and ESG Match Requirements:

The City's HOME match requirement of 25% continues to be met. As of December 31, 2023, the City reported in the 2023 CAPER an excess amount of \$1,117,948. The match requirement is generally met through housing developments. However, the City does report other match funds as they become available. For homeownership, this might be volunteer labor on a Habitat home that was purchased using the City's homeownership program. For housing rehabilitation projects, this could include capital improvement completed in the area.

Generally, the ESG match requirements are met by a combination of any of the following:

- Local funds
- State funds
- Sub-grantee donations
- Sub-grantee grants
- Sub-grantee in-kind non-cash contributions such as goods, services, equipment, or real property that are given to the ESG program.

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

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

Discussion

Not Applicable

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 New Construction	2025	2029	Affordable Housing Non-Homeless Special Needs	City Wide CDBG Eligible Areas	Housing Strategy	HOME: \$650,043 .80	Homeowner Housing Added: 5 Household Housing Unit
2	HS-2 Preservation of Housing	2025	2029	Affordable Housing Non-Homeless Special Needs	City Wide CDBG Eligible Areas	Housing Strategy	CDBG: \$987,051 .40	Homeowner Housing Rehabilitated: 10 Household Housing Unit
3	HS-3 CHDO Support & Development	2025	2029	Affordable Housing Non-Homeless Special Needs	City Wide CDBG Eligible Areas	Housing Strategy	HOME: \$185,726 .80	Homeowner Housing Added: 1 Household Housing Unit Other: 1 Other
4	HS-5 Fair Housing	2025	2029	Affordable Housing Non-Homeless Special Needs	City Wide CDBG Eligible Areas	Housing Strategy	CDBG: \$10,000. 00	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	HS-6 Project Delivery	2025	2029	Affordable Housing Non-Homeless Special Needs	City Wide CDBG Eligible Areas	Housing Strategy	CDBG: \$353,435.00	Homeowner Housing Added: 6 Household Housing Unit Other: 1 Other
6	HMS-1 To Reach Functional Zero	2025	2029	Homeless	City Wide CDBG Eligible Areas	Homeless Strategy	ESG: \$192,497.00	Other: 5 Other
7	CDS-3 Clearance/Demolition	2025	2029	Non-Housing Community Development	City Wide CDBG Eligible Areas	Community Development Strategy	CDBG: \$300,000.00	Buildings Demolished: 6 Buildings
8	EDS-1 Business Support	2025	2029	Non-Housing Community Development	City Wide CDBG Eligible Areas	Economic Development Strategy	CDBG: \$125,000.00	Businesses assisted: 5 Businesses Assisted
9	AMS-1 Overall Coordination	2025	2029	Administration	City Wide CDBG Eligible Areas	Administration, Planning, and Management	CDBG: \$443,871.60 HOME: \$92,863.40	Other: 2 Other

Table 2 - Goals Summary Information

Goal Descriptions

1	Goal Name	HS-1 Housing New Construction
	Goal Description	Increase the number of housing units in the City for owners and renters through new construction. This includes, but is not limited to, costs associated with acquisition, disposition, clearance, demolition, infrastructure, and new construction of residential housing.
2	Goal Name	HS-2 Preservation of Housing
	Goal Description	Preserve existing housing units in the City for owners and renters. This includes, but is not limited to, costs associated with acquisition, disposition, clearance, demolition, infrastructure, and the rehabilitation of residential housing.
3	Goal Name	HS-3 CHDO Support & Development
	Goal Description	Support CHDO's with operating dollars and development funds. This meets the HOME program 15% minimum set aside requirement for affordable housing. Funds would be used for the development of decent, safe, and sanitary housing for owners and renters. This includes, but is not limited to, costs associated with acquisition, new construction, reconstruction, and the rehabilitation of residential housing. In addition, eligible homebuyers purchasing any of the newly developed units may receive homebuyer assistance such as down payment, etc.
4	Goal Name	HS-5 Fair Housing
	Goal Description	Promote fair housing choice through education, testing, training, and outreach in the City of Rockford.
5	Goal Name	HS-6 Project Delivery
	Goal Description	Support housing through project delivery; the comprehensive process of carrying out and completing housing units.
6	Goal Name	HMS-1 To Reach Functional Zero
	Goal Description	Supplement the Continuum of Care's efforts by identifying and engaging people at risk of and experiencing homelessness, intervening to prevent the loss of housing and divert people from entering the homelessness services system, and providing immediate access to shelter and crisis services. This includes, but is not limited to, efforts related to street outreach, emergency shelter, homeless prevention, rapid re-housing, operating, supporting the Homeless Management Information System (HMIS), and administration.
7	Goal Name	CDS-3 Clearance/Demolition
	Goal Description	Remove and eliminate slum and blighting conditions through demolition of vacant, abandoned, and dilapidated structures.

8	Goal Name	EDS-1 Business Support
	Goal Description	Provide financial support to start and/or grow businesses.
9	Goal Name	AMS-1 Overall Coordination
	Goal Description	Provide program management and oversight for the successful administration of Federal programming, 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.

Table 3 – Goal Descriptions

AP-35 Projects – 91.220(d)

Introduction

The City of Rockford proposes to undertake the project types below with the FY 2025 CDBG, HOME, and ESG, funds. The Project Summary Table details how all of the 2025 funds are budgeted by project and the number of anticipated units of measurement (household, jobs, etc.) assisted for each of those projects.

Projects

#	Project Name
1	HS-1 Housing New Construction
2	HS-2 Preservation of Housing
3	HS-3 Community Housing Development Organization Support & Development
4	HS-5 Fair Housing
5	HS-6 Project Delivery
6	HMS-1 To Reach Functional Zero for Families, Youth, and Single Adults
7	CDS-3 Clearance/Demolition
8	EDS-1 Business Support
9	AMS-1 Overall Coordination

Table 4 – Project Information

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

The allocation priorities and the projects outlined above directly align with the City of Rockford 2040 Comprehensive Plan and the City of Rockford, IL 2023-2032 Housing Needs Assessment and Market Study. These documents together cover each aspect of the projects listed above.

For instance, the City of Rockford 2040 Comprehensive Plan covers areas such as: equitable access to housing, housing choice, barriers to housing, cost burden, affordability, lack of units, special needs populations, vacant housing efforts, homelessness reduction efforts, and historic preservation.

Some of the key takeaways from the City of Rockford, IL 2023-2032 Housing Needs Assessment and Market Study were: there's an immense need for new housing construction, the preservation and rehabilitation of existing units is important, fair housing and low-income housing needs have been addressed and continue to improve, improved coordination between City of Rockford government and partner agencies, affordable housing is an issue that may in part be due to availability of units, development of infill lots especially in areas that have seen high demolition rates.

Both of these plans considered community input that was gathered from surveys, meetings and stakeholder interviews. Residents confirmed that their barriers to housing included not enough available units, the condition of the available units or their current unit, and the access to good jobs and reliable transportation. This input confirmed what the City's planning data said – Rockford needs to build and preserve housing units that have access to services, jobs and transportation options.

At this time there are no concerns or known obstacles that will cause issues with the City of Rockford's plans to address its underserved community needs.

AP-38 Project Summary

Project Summary Information					
No.	Project	Goals Supported	Geographic Areas	Needs Addressed	Funding
1	HS-1 Housing New Construction	HS-1 Housing New Construction	CDBG Eligible Areas - Local Target area City Wide - Other	Housing Strategy	HOME : \$650,043.80
	Description	Increase the number of housing units in the City for owners and renters through new construction. This includes, but is not limited to, costs associated with acquisition, disposition, clearance, demolition, infrastructure, and new construction of residential housing.			
	Target Date for Completion	12/31/2026			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	5 households			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	CDBG Eligible Areas and/or City Wide.			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	New construction of five (5) single family homes to be purchased by households with income at or below 80% of the Area Median Income.			
2	HS-2 Preservation of Housing	HS-2 Preservation of Housing	CDBG Eligible Areas - Local Target area City Wide - Other	Housing Strategy	CDBG : \$987,051.40
	Description	Preserve existing housing units in the City for owners and renters. This includes, but is not limited to, costs associated with acquisition, disposition, clearance, demolition, infrastructure, and the rehabilitation of residential housing.			
	Target Date for Completion	12/31/2027			

	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Ten (10) households with income at or below 80% of the Area Median Income.			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	CDBG Eligible Area and/or City Wide			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Rehabilitation of ten (10) housing units.			
3	HS-3 CHDO Support & Development	HS-3 CHDO Support & Development	CDBG Eligible Areas - Local Target area City Wide - Other	Housing Strategy	HOME : \$185,726.80
	Description	Support Community Housing Development Organizations with operating dollars and development funds. This meets the HOME program 15% minimum set aside requirement for affordable housing. Funds would be used for the development of decent, safe, and sanitary housing for owners and renters. This includes, but is not limited to, costs associated with acquisition, new construction, reconstruction, and the rehabilitation of residential housing. In addition, eligible homebuyers purchasing any of the newly developed units may receive homebuyer assistance such as down payment, etc.			
	Target Date for Completion	12/31/2026			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	One (1) household with income at or below 80% of the Area Median Income.			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	CDBG Eligible Areas and/or City Wide.			

	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Development of one (1) single family home for purchase. In addition, operating funds will be made available for a CHDO.			
4	HS-5 Fair Housing	HS-5 Fair Housing	CDBG Eligible Areas - Local Target area City Wide - Other	Housing Strategy	CDBG : \$10,000.00
	Description	Promote fair housing choice through education, testing, training, and outreach in the City of Rockford.			
	Target Date for Completion	12/31/2025			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Varies depending upon the Fair Housing project approved for funding.			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	CDBG Eligible Areas and/or City Wide.			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	The City will award a Fair Housing project.			
5	HS-6 Project Delivery	HS-6 Project Delivery	CDBG Eligible Areas - Local Target area City Wide - Other	Housing Strategy	CDBG : \$353,435.00
	Description	Support housing through project delivery, the comprehensive process of carrying out and completing housing units.			
	Target Date for Completion	12/31/2027			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may	Project Delivery will provide for sixteen (16) households with income at or below 80% of the Area Median Income will be assisted (10/CDBG and 6/HOME). One (1) Community Housing Development Organization will be assisted with HOME funds.			

	be available on the AP-36 Project Detail screen)				
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	CDBG Eligible Areas and/or City Wide.			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Project delivery for CDBG and HOME funded activities. Properties may not be counted more than once per funding source. Therefore, accomplishments for CDBG assisted properties will be reported once under HS-2 Preservation (which is CDBG funded) and accomplishments for HOME assisted properties are reported once under HS-1 Housing New Construction or HS-3 CHDO Support & Development (which are HOME funded) and once under HS-6 Project Delivery (which is CDBG funded).			
	HMS-1 To Reach Functional Zero for Families, Youth, and Single Adults	HMS-1 To Reach Functional Zero	CDBG Eligible Areas - Local Target area City Wide - Other	Homeless Strategy	ESG : \$192,497.00
	Description	Supplement the Continuum of Care's efforts by identifying and engaging people at risk of and experiencing homelessness, intervening to prevent the loss of housing and divert people from entering the homelessness services system, and providing immediate access to shelter and crisis services. This includes, but is not limited to, efforts related to street outreach, emergency shelter, homeless prevention, rapid re-housing, operating, supporting the Homeless Management Information System (HMIS), and administration.			
	Target Date for Completion	12/31/2027			
6	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)				
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	CDBG Eligible Areas and/or City Wide.			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	The following activities are anticipated: HMIS (\$33,500), Administration (\$14,437), Essential Services/Outreach (\$33,820), Essential Services/Emergency Shelter (\$15,200), Rapid Re-Housing (\$75,540), and Outreach (\$20,000). Approximately five			

		(5) homeless agencies will be awarded to assist homeless persons along with City staff.			
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7	CDS-3 Clearance/Demolition	CDS-3 Clearance/Demolition	CDBG Eligible Areas - Local Target area City Wide - Other	Community Development Strategy	CDBG : \$300,000.00
	Description	Remove and eliminate slum and blighting conditions through demolition of vacant, abandoned, and dilapidated structures.			
	Target Date for Completion	12/31/2027			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	The number and type of families varies, as this funding is going to be used to demolish six (6) buildings.			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	CDBG Eligible Areas and/or City Wide.			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	The City will clear, demolish, remove six (6) vacant and blighted buildings.			

8	EDS-1 Business Support	EDS-1 Business Support	CDBG Eligible Areas - Local Target area City Wide - Other	Economic Development Strategy	CDBG : \$125,000.00
	Description	Provide financial support to start and/or grow businesses.			
	Target Date for Completion	12/31/2026			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	The number and type of families varies, as the funding will assist five (5) businesses.			
	Location Description (additional information	CDBG Eligible Areas and/or City Wide.			

	for this discussion may be available on the AP-36 Project Detail screen)				
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Five (5) business will receive financial support.			
	AMS-1 Overall Coordination	AMS-1 Overall Coordination	CDBG Eligible Areas - Local Target area City Wide - Other	Administration, Planning, and Management	CDBG : \$443,871.00 HOME : \$92,863.40
	Description	Provide program management and oversight for the successful administration of Federal programming, 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 for Completion	12/31/2025			
9	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	The number and type of families varies, as the funding is for the administration of the CDBG and HOME funds.			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	CDBG Eligible Areas and/or City Wide.			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Administration of Federally funded programming, including all necessary compliance, planning, reviews, and reports. If the City receives \$25,000 or more in Program Income, The City will utilize 20% of the CDBG Program Income received throughout the year for administration, as well.			

Table 5 – Project Summary Information

AP-50 Geographic Distribution – 91.220(f)

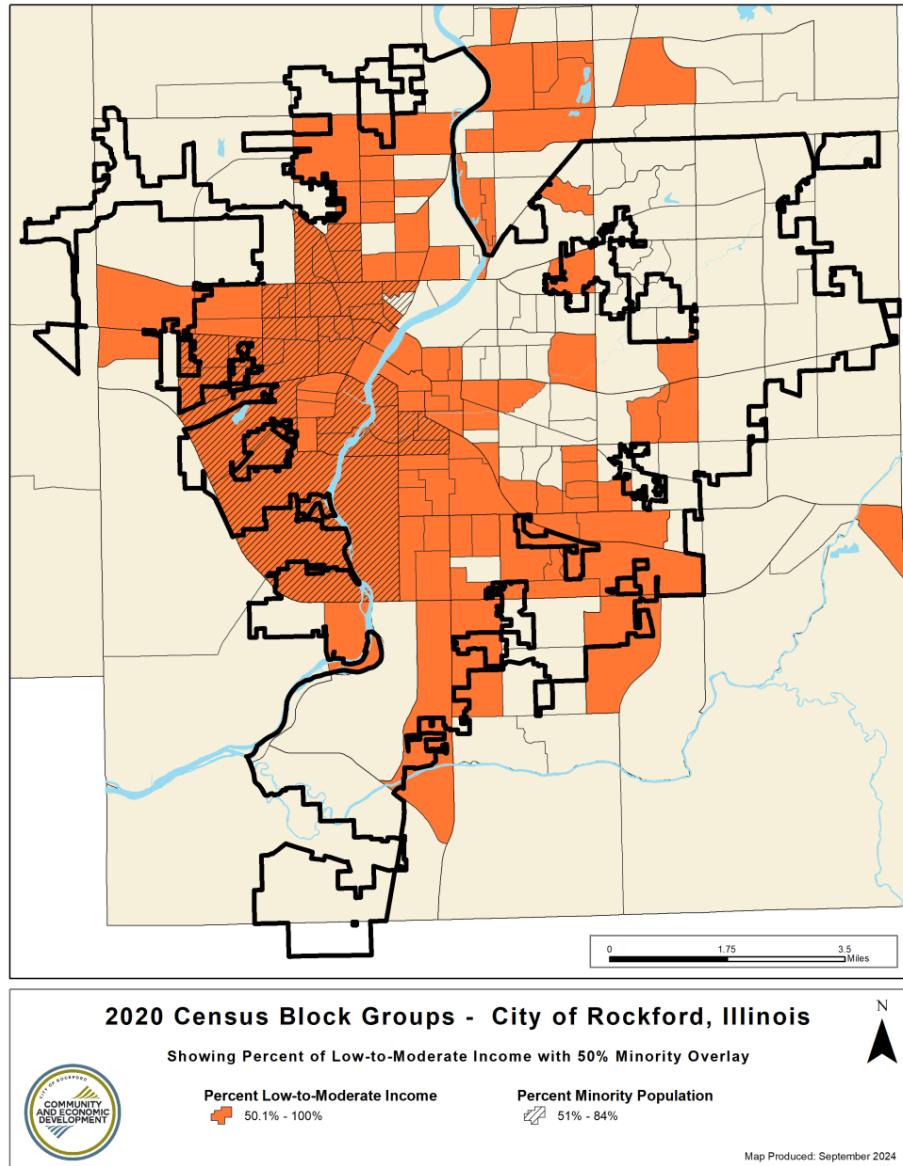
Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

A major portion of the funding that's allocated from the CDBG and HOME programs is available for use in any of the CDBG neighborhoods or citywide, depending on the specifics of the designated activities.

This is partially because the Rockford Housing Authority has many single family home scattered sites throughout the city. Also, some funding is available according to individual benefit rather than area benefit. Therefore, this makes it difficult to provide reasonable projections of the distribution of funds by target area.

However, this map shows the areas of low-to moderate income with the minority concentrations overlaid.

The following information provides a profile of the population, age, and racial/ethnic composition of the City of Rockford. This



information was obtained from the U.S. Census Bureau utilizing the most recent and relevant data that is available. Therefore, sometimes the dates may not all be the same or align perfectly between datasets and characteristics. This general demographic data was used to analyze the social, economic, housing, and general characteristics of the populations which these programs aim to serve and enrich.

Population:

The total population for the City of Rockford was 148,655 according to the 2020 Decennial Census for urbanized places.

City of Rockford Illinois - Population	
Total:	148,655
Population of one race:	133,052
White alone	77,669
Black or African American alone	34,240
American Indian and Alaska Native alone	1,136
Asian alone	5,213
Native Hawaiian and Other Pacific Islander alone	44
Some Other Race alone	14,750
Population of two or more races:	15,603

Table 6 – Population by Race

Census data for the past 30 years, shows overall population growth in both the urbanized and rural areas in Winnebago County. However, Rockford's population as a percentage of the county total has been slowly declining. However, this drop has not been significant, decreasing from 55 percent in 1990 to 52 percent in 2020.

Rockford Population Growth	Number				Percent Change			
	1990	2000	2010	2020	1990-2000	2000-2010	2010-2020	1990-2020
Rockford	139,426	150,115	152,871	148,655	8%	2%	-3%	7%
Loves Park	15,462	20,044	23,996	23,397	30%	20%	-2%	51%
Machesney Park	19,033	20,759	23,499	22,950	9%	11%	-2%	21%
Winnebago County (remaining)	78,992	87,500	92,662	90,348	11%	6%	-2%	14%
Winnebago County (total)	252,913	278,418	295,266	285,350	10%	6%	-3%	13%
% City of Rockford	55%	54%	52%	52%				

*1990 Census of Population: Social and Economic Characteristics. Illinois: 1990, Part 1
DP-1. Profiles of General Demographic Characteristics. Illinois: 2000
U.S. Census 2010. DEC SF1 Summary File P8 RACE
U.S. Census. 2020 Redistricting Data (PL 94-171) (P1 Race)*

Table 7 – Population Growth

Age:

The median age of Rockford's population has also increased over the last 20 years. The median age in 2010 was 35.8 and in 2020 it was 37.8. During the same time period the population under the age of 15 has decreased slightly from 21.6 percent in 2010 to 20.5 percent in 2020. In 2020, those under 5-years-old made up 6.7 percent of the population. Those between 25 and 34 years old made up the largest age groups in the city at 13.4 percent of the total population. These two age groups also made up the largest

portions of the population in 2010. The 65 to 74-year-old age group saw the largest population increase from 2010 to 2020 from 9,596 (6.2 percent), to 13,931 (9.4 percent).

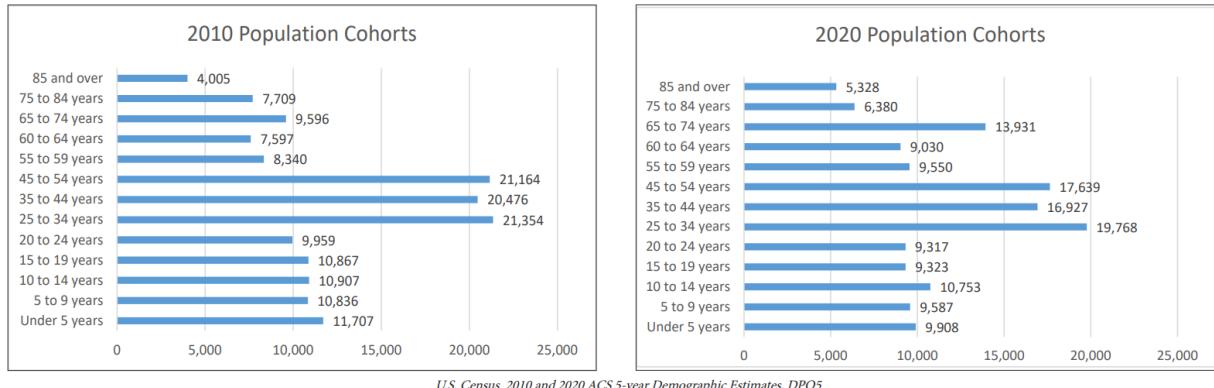


Table 7 & 8 – 2010 and 2020 Population Cohorts

Race/Ethnicity:

Rockford's minority population increased by nearly 170 percent between 1990 and 2020, growing from an estimated 26,408 in 1990 to 70,986 in 2020. In 1990 the minority population was just under 19 percent and grew to just over 48 percent by 2020. The majority of residents (52 percent) in the city were White in 2020. The second largest racial group in the city is Black or African American alone, comprising 23 percent of the population. The remainder of the city's population is comprised of: 10.5 percent Two or More Races, 3.5 percent Asian, 10 percent Some Other Race, 0.4 percent American Indian or Alaska Native, and 0.02 percent Native Hawaiian or other Pacific Islander.

From 1990 to 2020, the Hispanic or Latino population grew from 5,210, or about 4 percent of the total population to 29,583, or 20 percent of the total population in 2020. This equates to over a 450% increase in this population alone within the City of Rockford, according to the U.S. Census estimates.

RACE	Number				Percent Change			
	1990	2000	2010	2020	1990-2000	2000-2010	2010-2020	1990-2020
White alone	113,018	109,303	99,517	77,669	-3%	-9%	-22%	-31%
Black or African American alone	20,697	26,072	31,359	34,240	26%	20%	9%	65%
American Indian and Alaska Native alone	429	474	614	1136	10%	30%	85%	165%
Asian alone	2,405	3,301	4,443	5,213	37%	35%	17%	117%
Native Hawaiian and Other Pacific Islander alone	24	67	41	44	179%	-39%	7%	83%
Some other race alone	2,853	7,200	11,413	14,750	152%	59%	29%	417%
Two or more races	-	3,698	5,484	15,603	-	48%	185%	
Total Minority	26,408	40,812	53,354	70,986	55%	31%	33%	169%
Total Population	139,426	150,115	152,871	148,655	8%	2%	-3%	7%
Percent Minority, %	19%	27%	35%	48%	-	-	-	-

ETHNICITY	Number				Percent Change			
	1990	2000	2010	2020	1990-2000	2000-2010	2010-2020	1990-2020
Not Hispanic or Latino	134,216	134,837	128,786	119,072	0%	-4%	-8%	-11%
Hispanic or Latino	5,210	15,278	24,085	29,583	193%	58%	23%	468%
Total	139,426	150,115	152,871	148,655	8%	2%	-3%	7%
% Hispanic or Latino	4%	10%	16%	20%	-	-	-	-

*1990 Census of Population: Social and Economic Characteristics. Illinois: 1990, Part 1
 DP-1. Profiles of General Demographic Characteristics. Illinois: 2000
 U.S. Census 2010, DEC SF1 Summary File P8 RACE
 U.S. Census. 2020 Redistricting Data (PL 94-171) (P1 Race)*

Table 9 & 10 – Race and Ethnicity 2010 compared to 2020

Income:

Median household income increased by just under 15 percent between 2010 (\$38,573) and 2019 (\$44,252). While these gains appear to be a positive factor, the fact remains that Rockford did not increase at the same rate as Illinois and national figures. In 2010, Rockford's median household income was only 69.2 percent of the state median household income (\$55,735) and 74.3 percent of the national level (\$51,914). By 2019, these figures had dropped to 67.2 percent (\$65,886) and 70.4 percent (\$62,843), respectively. Generally, people earning below the median income are concentrated in downtown and southwest Rockford. Households earning above the median income are located outside downtown Rockford, particularly in the northern and southern portions of Rockford.

Economic:

According to the U.S. Census, Rockford's employment rate has stayed relatively stable since 1990. While there have been events to cause larger increases or decreases over the years, the rate always seems to stabilize back out over time. Unemployment rates were 6.1 percent in 1990, 4.7 percent in 2000, 7.3 percent in 2010, and 6.6 percent in 2019. In 2019, median unemployment rates by census tract ranged from a low 0.0 percent (geography with very few households) to a high of 35.8 percent, with a median unemployment rate of 7.0 percent for the entire city. Generally, regions around the perimeter of the city have higher unemployment rates, especially in the west and southwest portions of the city.

As of October 30, 2024, the unemployment rate in Rockford, Illinois was 5.4%, which is lower than the long-term average of 7.24%:

The unemployment rate was 5.4% in October 2024, down from 6.0% the previous month and 6.3% the previous year.

In 2010, manufacturing accounted for 20.4 percent of jobs in Rockford and by 2019 had only increased slightly to 21.9 percent. The local economy is still heavily dependent on manufacturing compared to the nation where only 10.1 percent of the workforce is in manufacturing. The Rockford Public School District (RPS205), UW Health, Mercy Health, OSF Healthcare, and Collins Aerospace are some of the top manufacturing companies in our city that employ Rockford residents.

Employment by Industry in Rockford (2019)	Number	Percent
Agriculture, forestry, fishing and hunting, and mining	155	0%
Construction	2,753	4%
Manufacturing	13,867	22%
Wholesale trade	1,304	2%
Retail trade	7,291	12%
Transportation and warehousing, and utilities	3,409	5%
Information	890	1%
Finance and insurance, and real estate and rental and leasing	2,076	3%
Professional, scientific, and management, and administrative and waste management services	6,571	10%
Educational services	3,666	6%
Health care and social assistance	10,082	16%
Arts, entertainment, and recreation, and accommodation and food services	6,321	10%
Other services, except public administration	3,258	5%
Public administration	1,440	2%
Civilian employed population 16 years and over	63,083	-

2019 ACS 5-year Estimate S2407 Industry by Class of Worker for Civilian Population

Table 11 – Employment by Sector

In Summary

Rockford's total population was similar in 2000 and 2010, then decreased by about 4,200 between 2010 and 2019.

At the same time, the city's minority population increased substantially, with growing diversity among all minorities.

The population is aging, with the median age increasing from 35.8 years in 2010 to 37.8 years in 2020.

While the population has changed in the last 10 years, the number of households has remained relatively stable.

Rockford has seen a decrease in single-parent families from 59,827 in 2010 to 59,551 in 2019.

The population 25 years and older with high school diplomas increased from 80 percent in 2010 to 84 percent in 2019, while the percentage of those with a bachelor's degree or higher, went from 21 percent in 2010 to 22 percent by 2019.

Rockford's percentage of households who earned \$50,000 to \$99,999 remained at around 40 percent in both 2010 and 2019.

Owner-occupied units have decreased from 60.5 percent in 2010 to 54.2 percent in 2019.

The number of vacant housing units has decreased from 13 percent in 2010 to 10.4 percent in 2019.

Geographic Distribution

Target Area	Percentage of Funds
CDBG Eligible Area	70%
City Wide	100%

Table 12 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Generally, all Federal funding must be utilized within the City of Rockford Municipal Boundaries.

Based on prior years reporting, the City anticipates that over 70% of the City's Federal funds will be within the CDBG Eligible Area. The Community Development Block Grant (CDBG) Eligible Area consists of census tracts with at least 51% of its residents being low- and moderate-income individuals, meaning their household income falls below 80% of the Area Median Income (AMI) in that area. Approximately, 45% of Rockford currently falls within the CDBG Eligible Area.

Discussion

Not Applicable.

AP-55 Affordable Housing – 91.220(g)

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	16
Special-Needs	0
Total	16

Table 6 - 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	5
Rehab of Existing Units	10
Acquisition of Existing Units	1
Total	16

Table 13 - One Year Goals for Affordable Housing by Support Type

Discussion

The Table above includes CDBG and HOME accomplishment totals (except for from HS-Project Delivery) from the AP-38 Project Summary Table above.

Emergency Solutions Grant: Through essential services, operating/rehab of emergency shelters, and homeless prevention/rapid rehousing, 300 homeless households will receive support, and 75 households will receive rental assistance.

AP-60 Public Housing – 91.220(h)

Introduction

Introduction

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

Rockford Housing Authority's Mission:

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

Rockford Housing Authority's Vision:

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

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

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

1. **Housing Occupants Mobilization Effort (HOME):** HOME is a resident-elected organization that collaborates with Resident Leadership Councils (RLCs) and RHA to address issues affecting public housing residents' quality of life. It serves as a governing body for RLCs and works in partnership with RHA staff to ensure compliance with HUD guidelines.
2. **Resident Leadership Councils (RLCs):** RLCs act as tenant organizations for RHA-managed properties. They advocate for residents' needs, evaluate living conditions, encourage self-sufficiency, and promote good relationships between residents, HOME/RAB, and RHA staff.
3. **RHA Family Self-Sufficiency (FSS):** RHA encourages residents to participate in the FSS program, offering four different paths to self-sufficiency.
4. **Life Force Development Institute (LDI):** RHA has developed an educational platform called LDI, offering a 12-week program focusing on personal development, financial wellness, and social skills to

empower residents and improve their quality of life.

5. Special Programs and Initiatives: RHA offers various programs, such as ConnectHome, New Mix & Craft Entrepreneurship, and Resident Leadership Council, to provide residents with additional opportunities and support.
6. Resident Opportunities for Self-Sufficiency (ROSS): ROSS works with residents to create individualized work plans related to employment and education, aiming to reduce or eliminate subsidy assistance through supportive services and resources.
7. Jobs Plus: This program provides education, training, and job placement opportunities for residents, allowing them to retain surplus income through the Jobs Plus Earned Income Disallowance (JPEID) and improve their financial stability.
8. Section III: RHA is a leader in implementing Section 3, providing economic opportunities, apprenticeships, and job placements for Section 3 residents and businesses in compliance with HUD guidelines.
9. Housing Choice Voucher (HCV): RHA serves over 1,700 families through the HCV program, including a Home Ownership program for 12 residents. The agency also aims to incentivize private landlords to participate in the HCV program.
10. Moving To Work (MTW) Designation: RHA has been granted the MTW designation by HUD, enabling us to implement enhancements such as elevated rent payment standards, property damage coverage, and signing bonuses for landlords. These initiatives aim to diversify housing options within the HCV program, benefiting program participants.

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

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

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

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

participate in homeownership

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

1. Housing Occupants Mobilization Effort (HOME): HOME is an organization comprised of RHA residents elected from Resident Leadership Councils (RLCs). It collaborates with RHA to address issues affecting public housing residents' quality of life. HOME/RAB, in partnership with RHA staff, assists RLCs and residents with organization and functioning while ensuring compliance with HUD guidelines.
2. Resident Leadership Councils (RLCs): RLCs serve as tenant organizations for RHA-managed properties. They advocate for residents, evaluate living conditions, promote independence, and foster good relationships between residents, HOME/RAB, and RHA staff. RLCs also provide a platform for sharing information about RHA programs and offerings.
3. RHA Family Self-Sufficiency (FSS): RHA encourages residents to participate in FSS programs, which offer four distinct paths to self-sufficiency.
4. Life Force Development Institute (LDI): LDI is a 12-week educational program focusing on various skills, including effective communication, decision-making, and financial wellness. It provides residents with valuable skills and is recognized as a continuing education program by local employers.
5. Special Programs and Initiatives: RHA offers special programs such as ConnectHome, New Mix & Craft Entrepreneurship, and Resident Leadership Council to provide additional support and opportunities.
6. Resident Opportunities for Self-Sufficiency (ROSS): The ROSS program works closely with residents to create individual work plans related to employment and education. ROSS Case Managers assist in connecting residents with local agencies and services to achieve self-sufficiency.
7. Jobs Plus: This program allows residents to participate in education and job training programs, with partnerships involving over 52 community organizations. It also offers Jobs Plus Earned Income Disallowance (JPEID) to help residents retain income surplus, improve credit scores, and address financial needs.
8. Section III: RHA has established an award-winning Section III program, providing economic opportunities, apprenticeships, and job placements for Section 3 residents and businesses.
9. Housing Choice Voucher (HCV): RHA serves over 1,700 families through the HCV program, including 12 participants in the Home Ownership program.
10. Moving To Work (MTW) Designation: RHA's MTW designation allows for enhanced rent payment standards, property damage coverage, and signing bonuses for landlords. A "Landlord Liaison" position has been created to facilitate connections between residents and landlords, promoting housing choices and program participation.

RHA has recognized the profound importance of homeownership for low-income families and has taken

significant steps to facilitate this opportunity. In collaboration with a local financial institution, we have established a home ownership program tailored specifically for our Low-Income Public Housing (LIPH) residents, who have historically lacked access to this path to prosperity.

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

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

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

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

Discussion

Not Applicable

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

Introduction

The City of Rockford is part of the IL-501 Boone, DeKalb, and Winnebago County Continuum of Care. The City supports the efforts of the Continuum of Care and encourages organizations to submit applications for ESG funding requests to the Northern Illinois Homeless Coalition.

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

- To reach functional zero for families by June 30, 2025
- To reach functional zero for youth by December 31, 2025
- To reduce the number of single adults experiencing homelessness so that we can reach functional zero for single adults by July 31, 2026

To accomplish these goals, the City is working on strategies to reduce the number of people entering the homelessness system and increase the number of monthly housing placements.

To accomplish these goals, the City is working on strategies to reduce the number of people entering the homelessness system and increase the number of monthly housing placements.

City of Rockford HHS will continue to reach out to homeless person via street outreach both during the day and night. Staff will work with them to assess their individual service needs. Efforts will then be made to connect them with the identified services and housing options available.

Addressing the emergency shelter and transitional housing needs of homeless persons

In addition to the above, the City will continue its Housing First emphasis, using Coordinated Entry for all persons who need emergency and transitional housing solutions.

The City of Rockford HHS is the Coordinated Entry (CES) location for Rockford (Winnebago & Boone Counties). Single point of entry is used for a physical location but also have a 24/7 emergency hotline to reach everyone in the service area. Staff is able to do client assessments in person at the office, during outreach, or over the phone. At that time, it is determined what services are needed right away.

Referrals are made to shelters, soup kitchens, or medical programs to meet immediate needs. At that time, people are placed onto the by-name list to wait for a permanent housing placement that will work for them. Clients are prioritized based on the CES policy; those people who have been homeless the longest and has the highest service needs do get priority within the housing system. In addition, CES

does case conferencing and works closely with partner agencies to identify those with the highest needs and work together on housing plans. Monthly mental health and homelessness committee is one example of this partnership. This group meets monthly to discuss those unsheltered individuals who have the most serious mental health needs and look for housing options for them. In many cases these individuals are too ill to reside in CoC programs and need a higher level of care which is very hard to get into.

The CES (usually in cooperation with partners through case conferencing), generally lay out the options that a person is eligible for. Those options are discussed and people are able to state what they would like to do. When there is an option available for that individual/family, it is offered to them. CES refers them to the housing program, then the person can speak with the program manager to see if it fits with their preferences. They always have the option to turn it down, if they want. Staff will encourage people to move into housing as soon as possible.

Use the housing first model, low barriers, client-centered (they don't have to answer or give information they are not comfortable with, choice in services they want/housing choice). The CES does not force participant to have IDs/documents in order to be eligible (will help them obtain documents if they need them). CES staff will help connect to services, such as transportation, mental health assessments, medical care. CES helps with housing navigation and completing applications.

With local funding from the Winnebago County Community Mental Health Board, the City HHS department is implementing 8 units of Transitional Housing for unsheltered persons who have a severe mental illness and/or addiction issue.

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

In addition to the above, it is the goal of the City of Rockford HHS/CoC agencies to get people from homelessness to permanent housed as quickly as possible. CES staff work with the family/individual to find a place that they are comfortable with and that they can afford. CES staff assists clients in completing applications for subsidized housing or housing assistance programs, if that is needed. Then case managers from the housing program assist to make sure they have a smooth transition-ensuring that they have utilities (if needed), basic furniture and necessities for the unit, and any services to be successful.

City staff are working with technical assistance providers at Community Solutions-Built for Zero to continue to look for strategies to reduce the length of time homeless for all populations. Homelessness

should be rare, brief, and non-recurring in Rockford. The ultimate goal would be no more than 30 days average (length of time homeless) for all populations. City staff are also working on strategies to prevent families or individuals from entering the homelessness system through diversion programs. In addition, City staff have implemented a new group to look at ways to educate Rockford citizens and leadership about the need for affordable housing for everyone.

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

In addition to above, the City of Rockford HHS, is a Community Action Agency, that has ongoing services available for the homeless and those who may be at-risk of homelessness. There are specific state grants that can be used to keep people from falling into homelessness. HHS has some agreements in place with systems of care. Specifically, the state foster care system contracts with HHS to ensure that youth aging out of the foster care system have services in place to help them with housing . Additionally, City Health & Humans Services Staff (HHS) is working with local hospitals to ensure they are discharging patients to appropriate locations. HHS is partnering with the State and a local healthcare system and fire department to implement a medical respite program for people who have illnesses that they need to recover from but have no safe place to go. They intend to implement that program in 2025 which will provide a safe housing location for those leaving the hospital setting and will then partner with primary care providers and housing agencies to link them with services and permanent housing resources. At least one CoC partner has a re-entry program working to house people as they leave the Department of Corrections system. Additionally, since the CoC is using the Housing First model, criminal acts do not disqualify them from most services.

Discussion

Not Applicable

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

Introduction:

The City of Rockford in its most recent Analysis of Impediments to Fair Housing Choice identifies that the City of Rockford's Zoning Code does not contain a definition for disabled or handicapped. The Zoning Code has been amended up through July 1st, 2024. There are no other public policies that restrict fair housing.

The City of Rockford's FY2025-2029 Analysis of Impediments to Fair Housing Choice has identified the following impediments and strategies:

Impediment 1: Fair Housing Education and Outreach. There is a need to educate persons about their rights under the Fair Housing Act and to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities and the disabled population who fear retaliation if they lodge a complaint.

A: Promote Fair Housing awareness through media, seminars, testing, and training to provide educational opportunities for all persons to learn more about their rights under the Fair Housing Act and the Americans with Disabilities Act

B: Provide literature and informational material concerning fair housing issues, an individual's housing rights, and landlord's responsibilities to affirmatively further fair housing.

C: Promote housing choice so residents with the same financial means may choose to live anywhere in the City, using media and seminars to educate tenants and landlords on Section 8 vouchers and source of income discrimination.

D: Provide fair housing education and outreach to seniors and people with disabilities to address fear of reporting housing and code violations.

E: Promote and advocate for fair housing testing.

Impediment 2: Need for Decent, Safe, and Affordable Rental Housing. The City of Rockford does not have a sufficient supply of rental housing that is decent, safe, and sound. In many cases, landlords often do not maintain their property to code standards which results in unsafe living conditions for tenants. However, the monthly cost of rent for apartments has steadily increased due to the limited supply of rental housing, despite the condition of the rental unit.

A: Support and advocate for both private developers and non-profit housing providers to develop and construct new affordable, mixed income, and middle-income rental housing throughout the City of Rockford.

B: Support and advocate for both private developers and non-profit housing providers to develop and construct new affordable, mixed income, and middle-income rental in vacant commercial and industrial structures.

C: Support and advocate for both private landlords and non-profit housing providers to rehabilitate existing housing units in the City to create decent, safe and sound rental housing that is affordable to lower income households.

Impediment 3: Lack of Affordable Homeownership Opportunities. Referencing Census data, the population of Rockford has remained relatively stable between 2010 and 2020 decreasing by about

4,200 people or -3%. However, the population is projected to increase due to regional growth factors mainly related to current and planned job growth. Therefore, it is expected that the number of new dwelling units needed to handle this growth is between 3,200 and 9,100 units by the year 2032. Renter-occupied units have increased from 39.5 percent in 2010 to 45.8 percent in 2019. In contrast, owner-occupied units have decreased from 60.5 percent in 2010 to 54.2 percent in 2019.

Today the biggest issue facing affordable home ownership opportunities are availability and cost. In 10 years, the average price of a home in the Rockford area has more than doubled. An average home in Rockford would cost you just over \$88,000 in 2014 while in June of 2023 the same home on average would cost just over \$198,000. As of June 2024, the median price of a home in Rockford was \$155,377, a 17.9% increase from the previous year.

- A:** Support and advocate for both private developers and non-profit housing providers to develop and construct new affordable housing that is for-sale.
- B:** Support and advocate for the acquisition, rehabilitation and resale of existing housing units to become decent, safe and sound.
- C:** Support and provide funds for down payment assistance to lower-income households to become homeowners.
- D:** Support homebuyer education and training programs to improve homebuyer awareness and increase the opportunities for lower-income households to become homebuyers.

Impediment 4: Need for Accessible Housing Units That Are For-Sale or Rent. There is a lack of accessible housing units in the City of Rockford. Most of the existing housing units do not have accessible features. The City's disabled population has grown to 32% of the total population.

- A:** Support home rehabilitation programs that financially assist seniors and people with disabilities to provide a safe and accessible home.
- B:** Support and encourage the development of accessible housing units in the City of Rockford.
- C:** Enforce the ADA and Fair Housing requirements for landlords to make "reasonable accommodations" to their rental properties so they become accessible to tenants with disabilities.

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

- A:** Support and enhance workforce development and skills training that result in a "livable wage" and increases job opportunities.
- B:** Continue to provide support, education, and technical assistance opportunities to minority, women owned and small businesses.
- C:** Continue to promote and encourage economic development with local commercial and industrial firms to expand their operations and increase employment opportunities.
- D:** Support and encourage efforts for improvements in public transportation options in the City to allow for employees to access housing of choice without worry of getting to work.
- E:** Support and encourage private and non-profit developers and businesses to provide assets (grocery stores, services, etc.) in low-to-moderate income neighborhoods.

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

The City of Rockford in its most recent Analysis of Impediments to Fair Housing Choice identifies that the City of Rockford's Zoning Code does not contain a definition for "disabled" or handicapped". The Zoning Code has been amended up through July 1st, 2024 and reflects updates and changes. There are no other public policies that restrict fair housing. There are no known public policies in the City of Rockford that are a barrier to affordable housing.

City's Department of Community and Economic Development monitors the following:

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

Discussion:

Not Applicable

AP-85 Other Actions – 91.220(k)

Introduction:

The City of Rockford has developed the following initiatives 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 2025 Program Year will take the following actions to address obstacles to meeting the underserved needs:

- Continue to provide funds for housing for owner occupied and renter occupied units.
- Continue to provide funds for new housing construction of owner occupied and renter occupied housing units that are decent, safe, sound, affordable, and accessible.
- Continue to work on the foreclosed and abandoned housing issues to help strengthen the City's vitality.
- Continue to work on the removal of architectural barriers in the City's older housing stock through rehabilitation.
- Continue to fund rehabilitation programs to help bring owner occupied housing stock up to code standards and to help seniors age in place.
- Continue to fund projects that assist business, employment training, and career counseling.
- Continue to leverage resources for minority and women owned businesses.
- The City will continue to leverage its financial resources and apply for additional public and private funds.
- Additionally, the City of Rockford will continue to implement its Residential Lead Service Line Replacement Program.

Actions planned to foster and maintain affordable housing

The following strategies and recommendations were proposed for the City of Rockford in the recent Housing Needs Assessment & Market Study (2023-2032).

Programs

- Relaunch and Enhance Downpayment Assistance Program. In the Consolidated Plan, HS-3 is the goal that works toward home ownership. Down payment assistance will support home ownership and help lift individuals and families out of poverty by allowing them to invest in an

asset, creating wealth. The City plans to relaunch its downpayment assistance program and should continue to evolve the program to meet local needs

- Redevelop Infill Lots that support low-moderate income residences
- Code Compliance and Registrations. Focus staff time and resources on encouraging full compliance with the Rental Registry and Vacant Land and Foreclosed Property Registry. These two tools are in place to support code enforcement. Focusing on code enforcement for residential properties will communicate to landlords and owners that residential properties need to be well-maintained in the City of Rockford.
- Reenact Home Rule. This will allow more opportunity to enforce building codes, create programs that disincentivize poor property maintenance and poor landlords, and ensure housing unit conditions are maintained to a decent, safe, and sanitary standard.
- Create a Public Sector Working Group. This group would meet on a regular schedule. One of its main goals would be to improve housing conditions in the most challenged neighborhoods. They would meet to discuss the various ways they could collaborate to implement strategies to increase home improvements, redevelop infill sites/vacant lots, encourage home ownership, and work together to make a concentrated positive impact on the target areas. The City would lead the effort and invite members to participate including Rockford Housing Authority and, R1 Planning Council. Other local groups could be added to the working group as appropriate.

Policies

- Prioritize Housing in TIF Districts. In TIF districts where it makes sense to incentivize housing development, projects creating housing, especially affordable housing, should be awarded more points.
- Focus on new development in existing subdivisions with infrastructure in place.
- Encourage development of townhomes.
- Training for Section 8 Voucher recipients and landlords.

Projects

- Oversee the development of infill lots. a. Start with vacant parcels in Wards 5, 6, 7, 11 and 13. There are 2,237 vacant lots in these five Wards, which total 70% of all the vacant residential lots in the City.
- Identify groups of vacant lots either contiguous or near each other and market them to a developer as a package. Incentivize the development of smaller homes on each lot.

Ultimately, more housing units will create a better housing environment for low- to moderate income households who are already overburdened by the cost of housing as a portion of their total expenses.

Actions planned to reduce lead-based paint hazards

The City shall continue to work towards the reduction of 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 explanation their responsibilities.
- Properly certified people perform risk assessment, paint testing, lead hazard reduction, and post project lead clearances.
- Required lead hazard reduction work and protective measures are incorporated into project rehabilitation specifications.

Homeownership Programs:

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

- Applicants for homeownership assistance receive the required lead-based paint information, including notices, and explanation of their responsibilities.
- Proper visual assessments are performed to identify deteriorated paint in the dwelling unit, common areas servicing the unit, and exterior surfaces of the building.
- Prior to occupancy, properly qualified persons perform paint stabilization and the dwelling passes Lead reduction involves the implementation of a lead-based paint treatments which will be carried out in conjunction with the City of Rockford's CDBG and HOME funded housing activities. The City partners with, and supports, the Winnebago County Health Department, who administers a "Creating Lead Safe Rockford" (CLSR) program. This program is funded by the U.S. Department of Housing and Urban Development (HUD) to mitigate lead hazards for low/moderate income owner-occupied or rental homes in the region. The City recognizes the importance of addressing lead-based paint hazards and will continue to support partners with and/or apply for additional resources to support these efforts.

Actions planned to reduce the number of poverty-level families

Approximately 22.2% of the City of Rockford's residents live in poverty, while only 15.1% Metro Area residents live in poverty and 11.8% of the State of Illinois residents live in poverty. Compared to the State of Illinois, Rockford has nearly double the number of residents in poverty as a percent of the total portion of residents.

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 antipoverty programs including:

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

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

Actions planned to develop institutional structure

To effectively implement the Five-Year Consolidated Plan, the City needs to collaborate with a variety of agencies located in the City of Rockford and in Winnebago County. Coordination and collaboration between agencies is important to ensuring that the priorities identified in the Five-Year Consolidated Plan within the City are adequately addressed. The key agencies that are involved in the implementation of the Five-Year Consolidated Plan and FY2025 Annual Action Plan, as well as additional resources that may be available are described below.

Public Institutions –

- The City continues to partner with the Winnebago County Health Department's Lead Safe Program on housing projects to leverage available resources.
- The Northern Illinois Land Bank was established in 2019 and will be a resource for addressing vacant and blighted properties, as well as providing more efficient and effective procedures for returning properties to beneficial use.
- In 2022, the City worked with Rockford Local Development Corporation, a non-profit lender, to establish and launch the Rockford Community Investment Fund (RCIF). RCIF is now a certified CDFI and provides construction loans to contractors completing acquisition/rehab projects. RCIF has completed over 200 loans so far, and all of the homes were sold to homeowners.
- The City's 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 2025, this staff member is working with Public Works, Police, and Fire to coordinate neighborhood efforts, and with local residents to host block parties.
- The City has updated its Neighborhood Revitalization Strategy, which will be used to determine

geographic priorities for community development and housing programs, depending upon the type of neighborhood (Strong, Middle, or Emerging), and the program type (i.e., homeownership, housing rehabilitation, economic development).

Non-Profit Organizations -

- The City certifies CHDOs at the time of application for an affordable housing project and also on an annual basis during the term of affordability.
- The City collaborates with other housing partner agencies to not only leverage funds but also support partner housing and community development projects.

Private Industry -

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

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

The City is committed to continuing its participation and coordination with public and private housing and social service agencies. The Neighborhood Development pages of the City website includes a list of resources for Fair Housing, Homebuyer Assistance programs, Mow to Own programs etc. Under the Health and Human Services Department's section of the website, the City offers information on financial assistance programs, homelessness prevention, Community Health, and information on the Continuum of Care and grant funding.

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

Through HUD's Thriving Communities Technical Assistance program, the City has established a Public Sector Working Group that will meet quarterly in perpetuity to coordinate plans, land use, and development. The newly established Community Based Organizations Group will remain an ad hoc advisory committee as the City launches its Housing Strategies in 2025.

Discussion:

Not Applicable

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

Introduction:

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
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
3. The amount of surplus funds from urban renewal settlements
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.
5. The amount of income from float-funded activities

Total Program Income

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: 70%

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.

2025, 2026, 2027

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(l)(2)

The jurisdiction must describe activities planned with HOME funds expected to be available during the year. All such activities should be included in the Projects screen. In addition, the following information should be supplied:

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:

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

The City does not use presumption of affordability for resale.

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

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

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

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

Not Applicable

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

Not Applicable

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

Not Applicable

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

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

See the attached City of Rockford Grant Policy. In addition to the Grant Policy, the City has ESG policies and procedures that are currently in the process of review and conversion to interactive electronic procedures. Full conversion is anticipated by the end of the year.

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 4:00 pm on Monday-Friday, excluding recognized holidays. Friday hours will be from 8:00 am-Noon for those individuals/families that are verified unsheltered. Those persons who are unsafe will be seen as needed. An after-hours "Hotline" will be available for 24-hour contact. For those clients in Boone County, contact can be made through the "Hotline". The number to contact (24/7) is 844-710-6919 Extension 5 for assistance. If you are in DeKalb County, you should call Hope Haven at 815-758-5765 or in person at 1145 Rushmoore Dr, DeKalb.

The SPOE conducts initial screenings and assessments, which allow for service matching and referrals to appropriate housing options. The SPOE is also responsible for maintaining a Centralized Waiting list. All Northern Illinois Homeless Coalition (NIHC) member agencies that operate any housing programs including Permanent/Permanent Supportive Housing (PH), Transitional Housing (TH), Emergency Shelters (ES), Rapid Rehousing, or Homeless Prevention for the homeless will operate by this procedure in order to better serve the homeless population. This includes both CoC/ESG funded agencies and those funded through other means.

The NIHC also seeks collaborations with other key stakeholders in order to make this a community-wide effort to end homelessness in Winnebago, Boone, And Dekalb Counties. Based On HUD recommendations, the SPOE Prioritizes clients based on lowest income, longest/chronically homeless and greatest barriers in accordance with the Housing First Model, those with the highest priority will be directed to Permanent Housing options first (including supportive and non-supportive housing options), followed by Transitional Housing and Emergency Shelters. Based on federal initiatives, special preference will also be given to veterans and chronically homeless individuals or families.

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

Generally, following the City of Rockford Grant Policy, the City publishes a request for proposals for ESG funding. All agencies, include community and faith-based organizations may submit a proposal for ESG funds.

NIHC members review proposals and provide recommendations to City staff. Only vetted agencies are then reviewed and approved by the City of Rockford City Council. Once approved, agencies sign grant agreements to receive their sub-awards.

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 does not anticipate being unable to meet the homeless participation requirement, as the City requires that ESG funded agencies have homeless representatives on their board of directors. In addition, the NIHC includes homeless and formerly homeless persons who advise on their programming.

However, should the City find that homeless participation is dwindling and therefore, the City is at risk of not meeting the requirement, the City will in accordance with 24 CFR Part 576.405(b), develop, implement, and publish as part of the City's Annual Action Plan, a plan to consult with homeless or formerly homeless individuals in considering and making policies and decisions regarding any facilities, services, or other assistance that received funding under ESG.

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.

Discussion:

Not Applicable

Appendix

1. Citizen Participation Plan

Proof of Notices for Public Hearings

2. September 18th and 24th – Published 8/30/24
3. December 5th - Published on 11/18/2024

Proof of Notice for Comment Period

4. Published on 11/25/2024
5. Resale/Recapture Guidelines
6. City of Rockford Grant Policy



CITIZEN PARTICIPATION PLAN
CITY OF ROCKFORD
COMMUNITY PLANNING AND DEVELOPMENT PROGRAMS

Effective January 1, 2023
(Contacts updated 5.20.2024)

Overview

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

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

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

Purpose

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

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

Participation

All residents, particularly low-income residents who are the primary clients for the CPD Programs, public housing, and tenant-based assistance, and all protected classes are encouraged to submit comments, views, and proposals regarding the City's CPD Programs. Protected classes, according to the federal Fair Housing Act, along with the Civil Rights Act of 1968 are as follows: race, color, national origin, religion, sex (including gender and sexual orientation), disability, and familial status. Familial status refers to households with children, households seeking custody of children, or women who are pregnant. Additional protected classes according to Illinois fair housing law include ancestry, age (40 and older), military status or unfavorable discharge from military service, marital status, order of protection status, and source of income.

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

All comments resulting from a publication and/or the public hearing(s) will be considered by the City prior to final submission of any plan or report. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the plan and any amendments.

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

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

Access to Information

Residents, public agencies, and other interested parties, including those most affected, will have the opportunity to receive information, review, and submit comments on any proposed submission concerning the CPD programs. This includes, but is not limited to the following:

- Budget; i.e., expected funding amounts, including program income, and activities to be undertaken;
- The estimated amount of funding that will benefit persons of low and moderate-income;
- The City must follow the Uniform Relocation Act of 1970, and therefore, intends to minimize displacement of persons and to assist any persons displaced when developing and carrying out budgets and plans. The City will specify the types and levels of assistance that will be available (or require others to make available) to persons displaced;
- At the time or, as soon as feasible, after the start of the public participation process, the City will make available the HUD-provided data and any other supplemental information that the City plans to incorporate into the consolidated plan. This data may be made available by cross-referencing to the data on HUD's website; and
- When and how the City will make the information above available.

The City intends to ensure all adopted documents are accessible to all. Therefore, they will be available via the City's website at www.Rockfordil.gov and at public places such as the library and other governmental offices. Upon request, the CEDD will make reasonable accommodations for residents unable to view via website, this includes, but is not limited to providing a reasonable number of free copies of the plan to residents and groups that request it.

CEDD shall maintain records to demonstrate compliance with the Citizen Participation Plan. The City will provide reasonable and timely access to information and records relating to the plan, amendments and reports. Availability of these records and information shall be consistent with applicable State and local laws regarding personal privacy and obligations of confidentiality.

Amendments

Standard Amendment:

The City shall amend its approved plan as specified in CDBG regulations [Title 24 of the Code of Federal Regulations, Part 91.505(a)]. Therefore, amendments will be made whenever the City makes one of the following decisions:

1. A change in its allocation priorities or a change in the method of distribution of funds;
2. To carry out an activity, using funds from any program covered by the applicable 5-year consolidated plan (including program income, reimbursements, repayment, recaptures, or reallocations from HUD), which is not previously described in the action plan; or
3. A change in the purpose, scope, location, or beneficiaries of an activity.

The amendments listed above are considered “standard” and do not require in-depth citizen participation.

Substantial Amendment:

A “Substantial Amendment” is one that requires Citizen Participation as defined herein. Criteria for substantial amendments are as follows:

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

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

Amendments using National Objective of Urgent Need:

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

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

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

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

Amendments under Public Health Recommendations or Major Disaster Declaration:

See Abbreviated Plan below.

Publishing & Notices

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

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

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

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

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

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

See Abbreviated Plan below.

Public Hearings

A minimum of two public hearings will be held throughout the program year. The hearings will be conducted at a minimum of two different stages of the year. Together, they will address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing, review of program performance, and announce if the City plans to access pre-award costs as allowed by the Uniform Administrative Requirements, Cost Principles and Audit Requirements regulation, at 2 CFR Part 200. At least one of the hearings will be held before the proposed plan or amendment is published for comment.

CEDD will try to hold public hearings at times and locations convenient to residents who may benefit or already benefit from the CPD programs. Locations will be accessible for residents with disabilities. In addition, CEDD intends to comply with the intent and spirit of the Americans with Disabilities Act. If a sign language interpreter, personal P.A. system or other special accommodations are needed, CEDD, will be prepared to assist if notified 48 hours in advance. Additionally, CEDD will provide interpreters when it is evident that a significant number of non-English speaking persons will be present.

Although not required, a third public hearing may be conducted to receive feedback regarding

performance reports and/or special projects.

Public Hearings under Public Health Recommendations or Major Disaster Declaration:

See Abbreviated Plan below.

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

An abbreviated plan may be utilized under the following circumstances:

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

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

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

Community Planning and Development Program Complaint Process

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

Neighborhood & Housing Programs

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

Sarah.Leys@rockfordil.gov

779-348-

7162

Economic Development Programs

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

Todd.Cagnoni@rockfordil.gov

779-348-7162

ESG & Homeless Programs

Angie Walker, Homeless Program Coordinator
Director

angie.walker@rockfordil.gov

779-348-7567

ESG & Homeless Programs

Christopher Greenwood, Community Services

christopher.greenwood@rockfordil.gov

779-348-7569

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

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

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

Todd.Cagnoni@rockfordil.gov

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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Govt Bids & Proposals

NOTICE TO BIDDERS

Sealed bids will be received by the Purchasing Department, Winnebago County Administration Building, 404 Elm Street, Room 202, Rockford, Illinois 61101 until:

September 20, 2024 at
11:00 AM

and at that time will be publicly opened and read aloud on the following:

24B-2357 PUBLIC SAFETY
BUILDING CONCRETE
RAMP SNOW & ICE MELT
REPLACEMENT
PROJECT

A MANDATORY Pre-Bid Meeting will take place on Friday, September 6, 2024 at 11:00 AM in the Winnebago County Administration Building.

Specifications may be obtained from the Purchasing Department, Winnebago County Administration Building, 404 Elm Street, Room 202, Rockford, Illinois 61101. Telephone: (815) 319-4380 or our Website at: www.wincoil.gov

Govt Public Notices

**PUBLIC HEARING NOTICE
CITY OF ROCKFORD,
ILLINOIS
COMMUNITY
DEVELOPMENT BLOCK
GRANT, HOME
INVESTMENT PARTNERS
HIPS PROGRAM, AND
EMERGENCY SOLUTIONS
GRANT FEDERAL
FUNDING**

Notice is hereby given that the City of Rockford will hold two (2) interactive public hearings. The public hearings will be Wednesday, September 18, 2024 & Tuesday, September 24, 2024 at 4:00 PM, at Crusader Community Health, 1200 W State St, Rockford, IL 61102.

Govt Public Notices

Crusader is accessible to persons with physical disabilities. If special arrangements are needed to accommodate any resident in order for them to participate in these public hearings, including translation services, please contact the Community & Economic Development Dept., City of Rockford, at 779-348-7162, or NDHousing@RockfordIL.gov, to make those arrangements. Please contact 7-1-1 for the TTY/TTD relay, if needed. The hearings will be held in accordance with PL 93-383, cited as the housing and Community Development Act of 1974, as amended. The purpose is to gather information for the City's Five Year Consolidated Plan for FY 2025-2029 (Plan), which includes a Housing Needs Analysis, Market Study, Analysis of Impediments to Fair Housing Choice, and the 2025 Annual Action Plan. The hearings will be used to share the outcomes of the Housing needs Analysis and Market Study completed in April 2024 and to hear comments, views, and proposals on the housing, community and economic development, and fair housing needs in the City of Rockford. The first interactive hearing will gather information on Fair Housing and Homelessness and the second will gather information on Housing and Economic Development.

Funding levels of \$2,219,358 Community Development Block Grant (CDBG), \$928,634 HOME Investment Partnerships Program (HOME), and \$192,497 Emergency Solutions Grant (ESG) are based on last year's funding. These funding levels are contingent upon the final approval of the 2025 Federal Budget, and therefore, will be adjusted based on the actual allocation announced by the Department of Housing and Urban Development (HUD) in 2025. In order to receive those funds, the City must prepare this Plan for the use of Federal funds.

Govt Public Notices

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. All interested residents, public agencies, and other interested parties are encouraged to attend both public hearings and to provide their oral or written comments concerning the needs of the City of Rockford and the use of CDBG, HOME, and ESG funds to address those needs over the next five (5) years. All comments will be taken into consideration by the City when developing the Plan. Written or oral comments may be directed to Sarah Leys, Deputy Director, City of Rockford, Community & Economic Development Dept., 425 E. State Street, Rockford, IL 61104, by calling (779) 348-7442, or by emailing Sarah.Leys@rockfordil.gov.

Thomas P. McNamara,
Mayor
City of Rockford, IL

Request for Proposals Snow & Ice Control Contracted Services

Please see the Village of Poplar Grove website at the below address for detailed bid information and requirements. Contact Village Hall with any questions regarding proposals.

<https://www.poplargarove-il.gov/publicworks/page/rfp-snow-ice-control-services>

Village of Poplar Grove
200 N. Hill Street, Poplar
Grove, IL 61065
Phone: (815) 765-3201
www.poplargarove-il.gov

Bid Due by:
September 27, 2024,
12:00PM
8/30, 9/6, 9/13, 9/20/24

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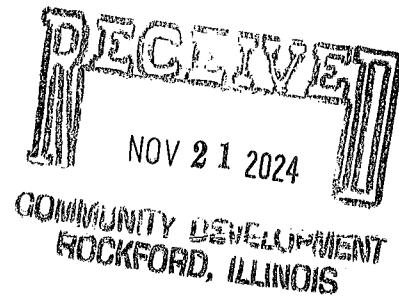
STATE OF ILLINOIS, COUNTY OF WINNEBAGO

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

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

11/18/2024

and that the fees charged are legal.
Sworn to and subscribed before on 11/18/2024





Legal Clerk



Notary, State of WI, County of Brown

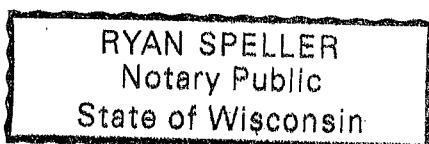


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NOTICE OF PUBLIC
HEARING FOR THE
FY 2025-2029 FIVE-YEAR
CONSOLIDATED PLAN,
FY 2025 ANNUAL ACTION
PLAN, AND
THE ANALYSIS OF
IMPEDIMENTS TO FAIR
HOUSING CHOICE
CITY OF ROCKFORD,
ILLINOIS

Notice is hereby given that the City of Rockford (City) will hold two (2) public hearings as follows: Thursday, Dec. 5, 2024 at 12:00 pm and 5:30pm at Crusader Community Health, 1200 W State St, Rockford, IL 61102, which is accessible for persons with disabilities. Both hearings will cover the same information.

The purpose of the public hearings are to present and receive input on the City's proposed Five-Year Consolidated Plan (CP) for FY 2025-2029, Annual Action Plan (AAP) for FY 2025, and Analysis of Impediments to Fair Housing Choice (AI). All of which, will be submitted to the U.S. Department of Housing and Urban Development (HUD) after City Council approval and HUD announces the final FY 2025 allocation amounts.

The CP, AAP, and AI were prepared after conducting public hearings on the housing and community development needs, meetings with stakeholders, housing providers agencies, and City staff and officials, and the results of a community wide survey questionnaire. The CP and AAP plans summarize available funding resources, as well as related proposed activities designed to meet community, housing, and economic development needs in Rockford. The AI identifies any impediments to fair housing choice and provides a plan to address them.

The 2025 AAP describes how the estimated funding levels of \$2,219,358 for Community Development Block Grant funds, \$928,634.40 in HOME Investment Partnerships Program funds, and \$192,497 for Emergency Solutions Grant funds will be spent. Funding levels are based on 2024 funding levels and are contingent on the final approval of the Federal FY 2025 budget.

In accordance with the City's Citizen Participation Plan, the City intends to comply with the intent and spirit of the Americans with Disabilities Act, and to provide interpreters when a significant number of non-English speaking persons will be present. Therefore, if an interpreter, personal P.A. system, or other special accommodations are needed, please contact Community & Economic Development Department at (779) 348-7162 or NDHousing@rockfordil.gov at least 48 hours in advance.

Public comments regarding the plans are encouraged and will be accepted at the public hearings. In addition, written comments may be addressed to Sarah Leys, Deputy Director, Dept. of Community and Economic Development, 425 East State St, Rockford, IL 61104, or emailed to sarah.leys@rockfordil.gov.

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

LOCALiQ

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Rockford Register Star

PO Box 631200 Cincinnati, OH 45263-1200

AFFIDAVIT OF PUBLICATION

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

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

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

11/25/2024

and that the fees charged are legal.
Sworn to and subscribed before on 11/25/2024



Legal Clerk



Notary, State of WI, County of Brown



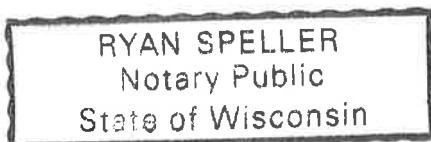
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NOTICE OF PUBLIC
REVIEW & COMMENT
PERIOD FOR THE
FY 2025-2029 FIVE-YEAR
CONSOLIDATED PLAN,
FY 2025 ANNUAL ACTION
PLAN, AND
THE ANALYSIS OF
IMPEDIMENTS TO FAIR
HOUSING CHOICE
CITY OF ROCKFORD,
ILLINOIS

Notice is hereby given that a draft of the City of Rockford (City) proposed Five-Year Consolidated Plan (CP) for FY 2025-2029, Annual Action Plan (AAP) for FY 2025, and Analysis of Impediments to Fair Housing Choice (AI) will be on available for review and public comment starting at noon on Wednesday, Nov. 27, 2024 through Monday, Dec. 30, 2024.

The CP, AAP, and AI were prepared after conducting public hearings on the housing and community development needs, meetings with stakeholders, housing providers agencies, and City staff and officials, and the results of a community wide survey questionnaire. The CP and AAP plans summarize available funding resources, as well as related proposed activities designed to meet community, housing, and economic development needs in Rockford. The AI identifies any impediments to fair housing choice and provides a plan to address them.

The 2025 AAP describes how the estimated funding levels of \$2,219,358 for Community Development Block Grant funds, \$928,634.40 in HOME Investment Partnerships Program funds, and \$192,497 for Emergency Solutions Grant funds will be spent. Funding levels are based on 2024 funding levels and are contingent on the final approval of the Federal FY 2025 budget.

The CP, AP, and AI proposed drafts may be found on the City's website at www.rockfordil.gov and during normal business hours at the following locations: City, Dept. of Community & Economic Development - 425 E. State St.; City, Human Services Office - 612 N. Church St.; Rockford Housing Authority - 223 S. Winnebago St; and Rockford Public Library Main branch - 215 S. Wyman St. (and all Rockford library branches). City Staff encourages public agencies, other interested parties, and all residents, including minorities, non-English speaking persons, and persons with disabilities, to comment regarding all of the draft documents. Comments received by 12/30/2024 will be taken into consideration as the plan is finalized. Written comments may be addressed to Sarah Leys, Deputy Director, Dept. of Community and Economic Development and mailed or hand delivered to City Hall, 425 East State St (2nd Floor - CED), Rockford, IL 61104, or emailed to sarah.leys@rockfordil.gov.

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

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

Grant Policy

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City of Rockford Grant Policy

Chapter 1 Key Points

- This Policy aims to establish grant oversight and coordination for the City's grant activity, thereby limiting its exposure to grant-related liability while increasing grant-related revenue, efficiency, and impact.
- This Policy serves to protect and assist City employees who apply for, accept, and manage City grants by providing important information on how to engage compliantly in these activities.
- This Policy is applicable to all federal, state, and private grants for which the City is applying or has been awarded.
- This Policy is applicable to all City employees who perform functions associated with any City grant application or award. City employees are responsible for ensuring grant writing or grant management consultants also follow the Policy.
- This Policy does not contain an exhaustive summary of all rules, regulations, or laws applicable to grants; it addresses important common requirements, primarily contained in the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements* ("Uniform Requirements") (2 CFR Part 200) that apply to state and federal grants.

CHAPTER 1: INTRODUCTION

a. Purpose and Objectives

This City of Rockford Grant Policy ("Policy") outlines the requirements that City of Rockford employees and grant consultants must follow when pursuing and managing City grants. The City typically receives over \$30 million in state and federal grant funds each year. The Policy aims to establish and maintain meaningful grant oversight and coordination for this volume of grant activity, thereby limiting the City's exposure to grant-related liability while increasing grant-related revenue, efficiency, and impact in the programs and services funded through grants. The Policies serve this aim by:

- ensuring proposed grant-funded projects are consistent with the City's strategic priorities;
- establishing clear accountability for financial and programmatic elements of grant management;
- requiring sound financial management of grant funds; and
- safeguarding the integrity of the City's good standing among grant-making entities by maintaining responsible and compliant grant management practices.

City of Rockford Grant Policy

The City utilizes grant funds to support many important programs, projects, and services it provides to the Rockford community. These funds enable a variety of efforts including those related to community and economic development, human services, public safety, and infrastructure improvement among others. It is critical that all departments foster exceptional stewardship of grant funds; failure to comply with grant conditions and applicable rules, laws, and regulations can put these public benefits at risk for the entire City. Improper or careless management of grant funds may lead to the loss of goodwill toward the City by its grantors; the need for the City to return awarded funds; and the possibility of jeopardizing the City's ability to secure future grant funding. This Policy also serves to protect and assist City employees who apply for, accept, and manage City grants by providing important information on how to engage compliantly in these activities.

b. Scope

This Policy is applicable to all federal, state, and private grants for which the City is applying or has been awarded. The City considers the term *grant* to include the following funding streams and instruments:

- competitive ("discretionary") state and federal grants, including those funded through a Cooperative Agreement;
- block, formula, or entitlement ("nondiscretionary") state and federal grants, including those funded through a Cooperative Agreement; and
- foundation, corporate, and other private grants.

The provisions contained in this Policy are applicable to all City employees who perform functions associated with any City grant application or award. City employees are responsible for ensuring grant writing or grant management consultants also follow the Policy.

This Policy does not contain an exhaustive summary of all rules, regulations, or laws applicable to grants; many government-granting agencies maintain their own set of specialized rules and regulations governing grants. There are also special conditions written into enabling legislation for many grant programs, as well as special conditions made part of grant agreements. However, the Policy addresses important common requirements, primarily contained in the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements* ("Uniform Requirements") (2 CFR Part 200) that apply to state and federal grants. If any City employee or consultant has questions about the requirements contained in this Policy, they may contact the City's Grant Compliance Officer for assistance. This Policy shall be reviewed periodically to assess whether changes are needed.

City of Rockford Grant Policy

Chapter 2 Key Points

- When the City receives a grant, it agrees to manage it according to the granting agency's terms and conditions and in compliance with applicable state and federal laws and regulations.
- The *Uniform Administrative Requirements, Cost Principles, and Audit Requirements* is an important regulation; this Policy is designed to ensure City compliance with the *Uniform Requirements* because the regulation has been widely adopted across federal and state granting agencies.
- As a reminder, the City's Conflict of Interest Policy applies to employees working in any capacity with grants, particularly in the selection of contractors and subawardees funded through grants.
- If any City employee becomes aware of a matter that may qualify as the subject of a mandatory disclosure to a granting agency, the employee must contact the Grant Compliance Officer immediately (see paragraph c. for a description of mandatory disclosures).
- City employees must be familiar with the roles and responsibilities of City staff and City Council related to grants, described in this chapter.
- If any City employee becomes aware of a potential violation of this Policy, he or she must report the matter to the Grant Compliance Officer or the Human Resources Department within twenty-four (24) hours of becoming aware of the potential violation.

CHAPTER 2: ADMINISTRATION

a. Compliance with Laws and Regulations

When the City receives a grant, it agrees to administer the funding according to the granting agency's terms and conditions and in compliance with state and federal laws and regulations. Accounting properly for grant expenditures and providing program documentation and evaluation is critical to the City's success in getting and keeping grant awards. The following are important state and federal laws and regulations that apply to government grants:

1. *Uniform Administrative Requirements, Cost Principles, and Audit Requirements* ("Uniform Requirements" or "Requirements") (2 CFR Part 200)

The *Uniform Requirements* were released by the U.S. Office of Management and Budget (OMB) in December 2013 to serve as government-wide grant administration and management framework for direct and pass-through federal grant awards to non-federal

City of Rockford Grant Policy

entities including state and local governments and nonprofit organizations. The *Requirements* became effective for grant recipients in December 2014 and they supersede requirements that had previously been issued in a series of OMB Circulars.

Federal grant awards are conditioned upon compliance with the *Uniform Requirements*; applicable provisions are typically referenced in the grant or cooperative agreement between the granting agency and the grant recipient. It is important to note that the requirement to comply with grant conditions, including the *Uniform Requirements*, flow down to subawards to subrecipients, unless specifically otherwise indicated in the award agreement or *UAR*. Many of the grant funds the City receives from the state of Illinois originate as federal funds, and are passed through a state agency to grant recipients using a discretionary (competitive) or nondiscretionary (block or formula) award process. Even when a recipient receives a state grant award, it is often a federal award passed through a state agency.

If a grant recipient fails to comply with federal statutes, regulations, or the terms and conditions of a federal award, the federal agency or pass-through entity (e.g. the state agency) may impose additional specific conditions to the award. If the federal or pass-through entity determines noncompliance can't be remedied through additional specific conditions, it may take one or more of the following actions:

- temporarily withhold cash payments pending correction of a deficiency;
- disallow all or part of the cost of the noncompliant activity or action (if funds have already been paid, this would require the grant recipient to pay back those funds);
- suspend or terminate the grant award;
- initiate suspension or debarment proceedings against the grant recipient, which would prevent the recipient from receiving *any* federal funds for a designated time period;
- withhold further grant awards for the project or program; or
- take other remedial action legally available.

This Policy is created to ensure compliance with the *Uniform Requirements*, but they apply to City grants from all sources, including those originating from state or private (foundation and corporate) funding.

2. Federal Granting Agency Regulations and Program Statutes

After the *Uniform Requirements* were released in 2013, federal granting agencies were given one year to review the new provisions and update their agency regulations to align with the *Requirements*. Many of the federal agencies and offices adopted the *Uniform Requirements* as written (approximately 28 did this). Some agencies received OMB approval for specific additions and exceptions (approximately 18 did this). All federal agency regulations implementing the *Requirements* are now contained in Title 2 of the Code of Federal Regulations. At the end of these Policies, there is a list of regulations for some of the most common granting agencies for City grants.

City of Rockford Grant Policy

These Policies have been created to conform with the *Uniform Requirements* because they have been widely adopted across federal and Illinois granting agencies. However, department staff who manage grants must be aware that granting agency regulations may differ slightly. If this is the case, the granting agency regulations prevail. The Council on Finance Assistance Reform created a helpful crosswalk of federal agency exceptions to the *Uniform Requirements* that is available on the U.S. Chief Financial Officers Council website at: <https://cfo.gov//wp-content/uploads/2014/12/Agency-Exceptions.pdf>. However, this crosswalk was created in 2014 and may not reflect changes to federal regulations if they have been made since that time.

In some cases, the program statute (the enabling statute that appropriates funding to support a particular type of grant award or series of awards) may contain additional requirements for grant recipients, limitations on the use of funds, or exceptions to federal statute. If this is the case, the program statute prevails over granting agency regulations. While the grant agreement should specify which laws and regulations apply to the grant award, department staff should contact the Legal Department with any questions in this regard.

3. Grant Accountability and Transparency Act (GATA) (30 ILCS 708)

GATA was passed in 2014 to increase accountability and transparency in the use of grant funds awarded by Illinois agencies through adoption of the Uniform Guidance. Its purpose was to develop a coordinated, non-redundant process for the provision of effective and efficient oversight over the selection and monitoring of state grant recipients. Two of the most basic functions of GATA are 1) to require state grant-making agencies pass through federal funds to comply with the Uniform Requirements applicable to pass-through entities, and 2) to require state agencies that award state-funded grants to adopt a consistent set of policies and procedures compatible with the *Uniform Requirements*. State awarding agencies are prohibited from imposing additional or inconsistent requirements from the *Uniform Requirements* unless specifically required or permitted by state or federal statute.

4. Federal Funding Accountability and Transparency Act (FFATA) (Pub. L. 109-282, as amended by Pub. L. 110-252)

FFATA, as amended, requires that information about federal grants and first-tier subawards and the executive compensation of certain awardees and subawardees be made publicly available. This information is published by OMB on a single, searchable website (USASpending.gov) that is open for public access.

When the City is the prime awardee of a direct federal grant, it is responsible for reporting specific subaward and executive compensation data for subawards of \$25,000 or more, cumulative over the term of the subaward. The City is required to do this through a reporting tool called the FFATA Subaward Reporting System (FSRS) no later than the end of the month that follows the month the subaward is made. The sub-award information entered in FSRS will then be displayed on www.USASpending.gov associated with the

City of Rockford Grant Policy

prime award received by the City. Additional information about complying with FFATA is contained in Chapter 7 on Subaward Management.

b. Conflict of Interest

As expressly stated in the City's Personnel Rules and Regulations, City employees are prohibited from soliciting, obtaining, accepting, or retaining any personal benefit from any supplier, vendor, customer/client, individual, or organization doing or seeking business with the City. This means that employees may not maintain an outside business or financial interest or engage in any outside business or financial activity that conflicts with the interests of the City or interferes with employees' ability to fully perform job responsibilities. It also means employees are prohibited from benefiting directly or indirectly from a third party who furnishes products, materials, or services to the City.

As a reminder, the City's Conflict of Interest Policy applies to employees working in any capacity with any grant proposed or awarded involving the City as recipient or subrecipient. No City employee shall have *any interest*, financial or otherwise, direct or indirect, or have any arrangement concerning prospective employment that will or may be reasonably expected to bias the design, conduct, reporting, or any other aspect of a grant-funded project. When working with grants, City employees shall avoid any action that might result in, or create the appearance of:

- using their position for private gain;
- giving preferential treatment to any person or organization;
- losing complete independence or impartiality; or
- making an official decision outside of official channels.

Not only do conflicts of interest violate grant terms and conditions and the City's policies, even the appearance of a conflict of interest can adversely affect public confidence in the grant-funded program and in the City generally. Violations of the Conflict of Interest policy may result in disciplinary action up to and including termination.

If a City employee believes he or she may have or may appear to have a conflict of interest related to grant administration, the employee must contact the Grant Compliance Officer or Human Resources Department to more fully discuss the issue and, if necessary, determine the most appropriate action to take to manage such conflict. If you believe another City employee may have a conflict of interest, you must report that information to the Human Resources Department.

c. Mandatory Disclosures

The *Uniform Requirements* mandate that grant recipients make timely written disclosure to the granting agency of any violation of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting direct or pass-through federal awards. Some grant agreements contain more extensive disclosure obligations that require reporting in the System for Award Management (SAM) certain civil, criminal, or administrative proceedings connected with the performance of a grant. State grant agreements may

City of Rockford Grant Policy

contain similar disclosure requirements. Failure to make mandatory disclosures can result in serious consequences for the City including suspension or debarment. In the very rare instance when a mandatory disclosure by the City may be required, the Grant Compliance Officer is responsible for managing these disclosures in consultation with the Legal Director. If any City employee becomes aware of a matter that may qualify as the subject of a mandatory disclosure, the employee must contact the Grant Compliance Officer immediately.

d. Roles and Responsibilities

The following summarizes the roles and responsibilities of City staff involved in grant application and award management, as well as the Rockford City Council.

City Council

- approves the acceptance of all grants that exceed \$25,000; authorizes the Mayor to enter into these grant agreements
- approves grant applications when ordinance or resolution is required by grantor
- approves all grant-related procurement, contractual, and administrative actions or delegates such approval authority to the appropriate Department Director or Central Services Manager, as required by the Rockford Code of Ordinances

Legal Department

- reviews all grant agreements before being signed by the Mayor or, for grants of \$25,000 or less, the Department Director
- reviews all contracts entered into under a City grant award, including subaward agreements, Intergovernmental Agreements, and other contracts before execution
- provides legal advice to departments concerning compliance with agreement terms and conditions, rules, laws, and regulations applicable to grants
- works with departments to draft subaward agreements and other necessary agreements in the administration of grants

Grant Compliance Officer

- establishes and updates grant-related policies and procedures to comply with applicable rules, regulations, and laws governing the management of grants
- provides guidance to departments on how to comply with City policies when needed
- coordinates the documentation of required approvals for grant pre-application assessment, application, and award acceptance
- serves as a clearing-house of City grant activity related to grant applications, awarded grants, and grant reporting requirements and due dates
- facilitates grant implementation planning among key departments including the grant-receiving department, Finance, Human Resources, Legal, and other relevant departments

City of Rockford Grant Policy

- maintains a master file for grants received by the City, including key grant-related documents, agreements, reports, and approvals
- develops and conducts Grant Policies and Procedures training for City employees who work with or manage City grants
- manages and maintains the City's registration and user access in the System for Award Management (SAM) and <https://www.grants.gov/>
- manages renewal of the City's Illinois Department of Human Rights (IDHR) public contracts number
- manages mandatory disclosures to granting agencies
- manages the reporting of federal first-tier subawards over \$25,000 in the FFATA Subaward Reporting System (FSRS)
- assists departments with the completion of granting agency risk assessments/questionnaires and compliance certifications

Finance Department

- coordinates and oversees the City's Single Audit, as required by the *Uniform Requirements* Subpart F
- assigns the general ledger accounting identifier that must be used to track all grant-related income, revenue, and expenditures in the City's accounting system, MUNIS
- completes the annual Internal Controls Questionnaire in the GATA Grantee Portal
- completes the Consolidated Year-End Financial Report (CYEFR) in the GATA Grantee Portal
- assists departments with the completion of grant budgets and financial reporting when needed
- completes financial grant closeout in the City's accounting system, MUNIS
- assists departments with coordinating on-site financial audits conducted by granting agencies
- ensures proper accounting of grant revenue and expenditures in close coordination with the managing department
- manages the City's Dun & Bradstreet (DUNS) Number and IRS Federal Employer Identification Number (FEIN)
- manages the City's Illinois Grant Accountability and Transparency Act (GATA) Grantee Portal account
- assist departments with the completion of granting agency risk assessments/questionnaires

Department Receiving Grant Funds

It is the responsibility of assigned department staff to manage the grant program and budget in accordance with the grant agreement, City policies, and applicable laws and regulations. The City department that applies for grant funds bears the primary responsibility of managing those funds and executing the grant-funded program or project.

City of Rockford Grant Policy

Department Director

The Department Director is responsible for his or her department's grant activity. Directors must ensure adequate employee resources are in place to properly manage the grant-funded project or program activities and the grant budget. The Department Director is responsible for:

- approving all grant applications and awards the department submits
- obtaining all additional required internal and City Council approvals before grant application or award acceptance, in compliance with these Policies
- ensuring that proposed grant budgets are adequate to support proposed programs or projects and that committed cost match funding is available
- ensuring adequate management of the programmatic/project and financial aspects of the grant award
- approving all grant reports prior to submission to the granting agency
- assigning a Project Manager, Award Manager (can be the same person), and administrative staff who can manage the program/project and grant budget effectively and compliantly
- ensuring staff who work with grants have been trained on the City's Grant Policies and are aware of the grant terms and conditions provided for in the grant agreement
- managing general departmental-level support activities related to grants management, including ensuring timely submission of all required grant reports
- approving any proposed programmatic/project or budget changes prior to requesting approval from the granting agency

To ensure clear accountability and responsibility for each grant, Department Directors will be required to identify staff who will serve in the following roles, once a grant award has been approved and the grant agreement has been executed:

Project Manager

The Project Manager is the primary person responsible for all grant activities. Although some tasks may be delegated, the Project Manager is the chief accountable person and bears responsibility for the overall administration of the grant award, for meeting the terms and conditions of the award, and for representing the grant-funded project or program to the granting agency.

The Project Manager may change throughout the grant term, but changes in the role assignment should be reported to the Grant Compliance Officer for recording in the central file. The Project Manager can also be the same person assigned to fill the role of Award Manager, but the Project Manager is not required to be the Award Manager.

City of Rockford Grant Policy

The Project Manager is responsible for:

- adhering to the terms and conditions of the grant agreement, City policies, and applicable laws and regulations related to the grant project
- notifying the Department Director about needed changes to the program/project scope and budget and obtaining the Director's approval prior to submitting a request of change to the granting agency
- modifying the project/program scope, as needed, and obtaining all necessary approvals from the granting agency prior to implementing any change that requires approval
- modifying the project/program budget, as needed, and obtaining all necessary approvals from the granting agency prior to incurring expenses that require approval
- providing a copy of all grantor-approved changes to the Grant Compliance Officer for documentation in the central file
- managing departmental staff or third-party contractors he/she has delegated or hired to assist in performing the Project Manager's responsibilities
- monitoring expenditures to ensure grant funds are spent in accordance with the approved budget
- ensuring the completion and timely submission of all reports to the granting agency
- ensuring that a copy of all reports submitted to the granting agency is provided to the Grant Compliance Officer for the central file
- ensuring continuation proposals, if applicable, are submitted on time and in accordance with City Grant Policies
- ensuring that subawardees are managed and monitored in compliance with City Grant Policies
- ensuring that contractors are hired in compliance with the City's procurement ordinance and policies, and that contractors have adequately performed work in a timely manner and in accordance with technical, financial, and other requirements of the award
- participating in City Grant Policies and Procedures training

Award Manager

The Award Manager is the individual who is responsible for managing financial aspects of the award and is the primary person who maintains all required financial records and prepares financial grant reports. If these duties are split among people, the Department Director may assign more than one Award Manager.

The Award Manager may change throughout the grant term, but changes in the role assignment should be reported to the Grant Compliance Officer for recording in the central file. The Award Manager can also be the same person assigned to fill the role of Project Manager, but the Award Manager is not *required* to be the Project Manager.

City of Rockford Grant Policy

The Award Manager is responsible for:

- adhering to the terms and conditions of the grant agreement, City policies, and applicable laws and regulations related to the grant budget
- managing the grant budget and ensuring the appropriate charging of expenditures to the project grant award using the assigned accounting identifier in the MUNIS system
- evaluating and enacting budget line item expenditure transfers, when such transfers are permitted without the approval of the granting agency
- completing financial reports (e.g. draw down requests) required by the granting agency
- notifying the Accounting Manager of all grant draw down requests or expected grant payments so that grant revenue can be properly recognized in the general ledger when received
- participating in City Grant Policies and Procedures training

e. Grant Misconduct

All grant-related activity must comply with this Policy. If any City employee becomes aware of a potential violation of this Policy, he or she must report the matter to the Grant Compliance Officer or the Human Resources Department within twenty-four (24) hours of becoming aware of the potential violation. The Grant Compliance Officer or Human Resources Department will take a report and work with the Department Director and assigned grant staff to determine whether a violation has occurred, and to identify appropriate remedial measures in consultation with the Department Director and Human Resources Department.

f. Systems Registrations

The Grant Compliance Officer and Finance Department are responsible for maintaining certain City registrations and accounts that are important to grants. The Grant Compliance Officer shall maintain the City's System for Award Management (SAM) registration, IDHR public contracts number, grants.gov, and FSRS account. The Finance Department shall maintain the City's Dun & Bradstreet (DUNS) Number, IRS Federal Employer Identification Number (FEIN), and the City's Illinois Grant Accountability and Transparency Act (GATA) Grantee Portal account. If any City employee has questions about these numbers or accounts, please contact the respective responsible party.

There are a variety of systems that granting agencies require grant recipients to use for the purpose of submitting programmatic and financial information and reports, among other things. The receiving department is responsible for maintaining access to and using these systems as required by the granting agency. At times, members of the Finance Department may also need to maintain access to these systems depending upon the role Finance staff play in managing a particular grant.

City of Rockford Grant Policy

Chapter 3 Key Points

- Grant applications that propose to expand the scope of services provided by the City must be evaluated thoroughly to determine whether commitment of staff time, overhead costs, and implementation resources are available to support the grant if awarded (for new grants, pre-assessment approval is required).
- Grant applications prepared by third-party grant writers are subject to the requirements of this chapter. Departments that have engaged a third party to prepare a grant application must provide a complete copy of the City of Rockford Grant Policy to the consultant.
- Department staff who prepare a grant application or oversee preparation by a third-party consultant are responsible for thoroughly reviewing all application materials to ensure they have been prepared in compliance with City policies and ensuring that all required approvals have been obtained prior to application submission.
- Grant funds may only be requested to supplement (add to/increase) departmental budgets, not supplant (replace) a different source of funding that has already been budgeted/set aside to pay for a project, program, or activity.
- Proposed grant budget costs must be allowable and allocable to the proposed project or program.
- If a department plans to request that a grant cover all or a portion of the costs of new or existing City employee positions, the department must contact the Finance Department to obtain a complete and accurate cost of the position over the term of the grant.
- Departments *may* but are not required to claim *de minimis* indirect costs as part of a proposed grant budget, following the guidance contained in this chapter.
- Cost match commitments must be allowable under the specific grant program requirements; allocable to the proposed program or project; not be committed as matching funds for another award; and not come from the same type of funding source as the grant (state vs. federal) unless permitted by the granting agency.
- Consider voluntary cost match commitments carefully; they are incorporated into binding requirements of the grant award in the same manner as mandatory cost match commitments.
- Departments must not commit to a granting agency that City funds will continue to support a proposed grant project or program beyond the grant award period.

City of Rockford Grant Policy

Chapter 3 Key Points (contd.)

- If a requesting department is required to complete a risk assessment or internal controls questionnaire, please coordinate completion with the Grant Compliance Officer.
- A helpful chart summarizing grant application approval requirements is contained at the end of this chapter.
- When a department presents a grant application to City Council for approval, the department is advised to also obtain approval to accept the award so that the grant only needs to go through Council once.
- The requesting department is responsible for submitting a final grant application to the granting agency after obtaining all required approvals.

CHAPTER 3: GRANT APPLICATION

When pursuing grants, City employees must consider how the grant and the obligations it may create will further the City's strategic goals. Grant applications that propose to expand the scope of services provided by the City must be evaluated thoroughly to determine whether commitment of staff time, overhead costs, and implementation resources are available to support proposed grant activities and administration if the grant is awarded.

City grant applications prepared by third-party grant writers are subject to the requirements contained in this chapter. Departments that have engaged a third party to prepare a grant application on the City's behalf must provide a complete copy of the City of Rockford Grant Policy at the time of consultant engagement so the grant writer understands the City's requirements. Department staff are responsible for:

- thoroughly reviewing all application materials prepared by a third party to ensure they have been prepared in compliance with the City policies; and
- ensuring that all required approvals have been obtained prior to application submission.

a. Application Preparation

It is the requesting department's responsibility to prepare and submit grant applications. However, the department may identify the need for assistance in completing some aspects of the application. If the department does not know who to contact in order to request assistance, the department should contact the Grant Compliance Officer, who will attempt to identify the appropriate City employee(s) to assist.

City of Rockford Grant Policy

1. Avoid Supplanting

Grant funds may only be requested to supplement (add to/increase) departmental budgets, not supplant (replace) funding that has already been budgeted/set aside to pay for a project, program, or activity. Departments are prohibited from applying for grant funds that will be used to supplant an existing expense so that already budgeted funds can be diverted to another use, *unless explicitly allowed by the granting agency in writing*.

Most granting agency regulations prohibit the practice of supplanting, and violations of these regulations may result in revocation or return of grant funds and/or suspension of future funds from the granting agency.

2. Carefully Consider Proposed Partners

Granting agencies often require grant applicants to collaborate with partner agencies or organizations in order to meet the requirements of a grant opportunity. Even when not required, departments may wish to voluntarily partner with outside organizations or agencies to jointly undertake a proposed project or program.

When proposing partnerships as part of a grant application, it is critical that the requesting department fully and carefully evaluate the partner it chooses--particularly when the partner will receive a subaward under the grant. A subaward is a portion of the grant award passed on by the grant recipient to a subrecipient for the purpose of carrying out all or part of the funded project or program. In these cases, the City serves as a pass-through entity and is responsible for contracting with and monitoring the subrecipient to ensure that it complies with the terms and conditions of the grant agreement and all applicable rules, regulations, and laws. City obligations as grant recipient flow down to its subrecipients (see Chapter 7 for policies on Subaward Management). Departments must carefully assess whether the partner(s) they are considering is willing and able to fulfill these obligations as a subrecipient.

b. Developing a Grant Budget

The grant budget is a critical element of every grant proposal and must be carefully developed because a grant recipient must abide by it when administering the award. Budgets must include all direct costs necessary to support the proposed project or program. These costs must be allowable and allocable to the proposed project or program.

In order for a cost to be allowable, it:

- must be necessary and reasonable for the performance of the grant award;
- must conform to any limitations or exclusions set forth in the *Uniform Requirements* Subpart E—Cost Principles or regulations set by the granting agency;
- must be consistently treated by the City as either a direct or an indirect cost across awards received by the City;

City of Rockford Grant Policy

- must not already be included as a cost or used to meet the cost matching requirements of any other federally- or state-financed program, respectively; and
- must be able to be adequately documented.

A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances.

A cost is allocable to a grant award if the goods or services involved are chargeable or assignable to the award in accordance with the benefits received. This standard is met if the cost:

- is incurred specifically for the grant award; or
- benefits both the grant award and other work of the grant recipient and can be distributed in approximated proportions using reasonable methods.

In addition, under the *Uniform Requirements*, grant expenditures must be tied to program activities. Therefore, granting agencies often require that budget narratives explain not only the calculation of costs, but also how the costs relate to the proposed program activities and objectives.

1. Calculating Employee Compensation Costs (Personnel Pay and Fringe Benefits)

If a department plans to request that a grant award cover all or a portion of the costs of new or existing City employee positions, the department must contact the Finance Department to obtain a complete and accurate cost of the position over the term of the grant. Requesting departments must also do this if all or a portion of the costs associated with new or existing City positions will be used as a cost match. The Finance Department will advise as to pay and fringe benefits costs, as well as the overhead/facilities costs associated with the position (e.g. cost of physical workspace, telephone, parking space, etc.).

The fringe benefit costs (i.e. employer contributions) that are typically allowable under a grant award include costs of leave (vacation, family-related, sick or military); social security; employee life, health, unemployment, and worker's compensation insurance; pension plan costs; and other similar benefits provided in accordance with the City's benefit plan. As with all direct costs, pay and fringe benefit costs must be allocable to the proposed award.

Compensation, fringe benefits, and overhead costs often change from year to year. Even if the requesting department has previously obtained similar information from Finance for a given position, the requesting department must check with the Finance Department each time it prepares a proposed grant budget to ensure nothing has changed.

City of Rockford Grant Policy

2. Direct vs. Indirect Costs

The total cost of a grant award is typically the sum of direct and indirect costs. With grant budgets, it is essential that each item of cost incurred for the same purpose be treated consistently either as a direct cost or an indirect cost across all City grant awards.

i. Direct Costs

Direct costs are expenditures necessary to conduct the grant program or project. The seven standard federal categories for direct costs, also called object class categories, include: personnel; fringe benefits; travel; equipment; supplies; contractual; and other. State grant budget forms often replicate these categories.

Direct costs are costs that can be identified *specifically* with a particular grant award. They can be assigned relatively easily with a high degree of accuracy. The City, as grant recipient, must be able to adequately document direct costs under the grant when drawing down or using grant funds. Departments must keep these requirements in mind as they create proposed grant budgets so that there will be no issues with compliantly managing the grant once awarded. After award, if direct expenditures are not allowable, allocable, and adequately documented, they may be disallowed by the granting agency, requiring the City to bear the cost of such expenses.

ii. Indirect Costs

Indirect costs, also referred to as “facilities and administration costs” or “F & A costs,” are associated with general overhead and operating expenses and are not easily assignable to one specific project or program. These types of expenditures tend to support the overall grant receiving entity and may include expenses such as utilities, telephone service, maintenance, and administration and legal services (e.g. purchasing, payroll, human resources, and other similar pooled support functions).

Granting agencies often allow applicants to request a portion of their indirect costs under a grant award in order to receive partial reimbursement for the many expenses associated with general operations. Grant applicants are *not required* to include indirect costs as part of a proposed grant budget. However, if they wish to, applicants must do so in one of two ways:

- using a negotiated indirect cost rate, which has been approved by the applicant’s cognizant agency (for local governments, the cognizant agency is generally the agency with the largest dollar value of awards with the local government), or
- using a 10% *de minimus* rate without negotiation, which is permitted under the *Uniform Requirements* (2 CFR §200.414(f)).

If an applicant has ever negotiated an indirect cost rate with a government agency, it is generally not permitted to use the 10% *de minimus* rate. However, if an applicant has never

City of Rockford Grant Policy

had a negotiated indirect cost rate, it is permitted to use the *de minimus* rate indefinitely, subject to certain limitations.

(A) The City's Approach to Charging Indirect Costs Under Grants

The City has never had a negotiated indirect cost rate and does not receive more than \$35 million in direct federal funding. Therefore, City departments may elect to claim *de minimus* indirect costs under the *Uniform Requirements*. However, for City grants, funds received for indirect costs may ONLY be applied to the general fund to offset costs associated with administration, *not* to offset costs associated with facilities. This is because, as explained in the introduction to this chapter, costs must be consistently charged as indirect or direct across all City grants. There are some City departments that charge facilities costs as direct costs. This is why funds received for indirect costs using the *de minimus* rate may ONLY be applied to the general fund to offset City expenses associated with administration functions such as those that sit within the Human Resources, Finance, and Legal Departments. This is important because, when preparing a grant budget, departments should be sure to include facilities-related costs of a housing a position in the budget as direct costs (examples would include the cost of a phone, IT services, parking space, etc.). The Finance Department will provide this information as part of the calculation of Personnel Costs.

(B) Calculating Indirect Costs Using the *De Minimus* Rate

When using the *de minimus* rate of 10%, the cost base for the indirect cost calculation is the modified total direct costs (MTDC) under the grant award. MTDC, which is defined in the *Uniform Requirements* §200.68, includes all allocable direct salaries and wages, fringe benefits, materials and supplies, services, travel, and up to the first \$25,000 of each subaward. Direct costs that are EXCLUDED from MTDC include equipment, capital expenditures, rental costs, and the portion of each subaward that exceeds \$25,000.

3. Cost Sharing or Matching (Used Interchangeably)

Granting agencies must state whether cost sharing or matching is required under a grant opportunity; if it is not required, they must state so explicitly. In general, cost sharing and matching requirements will be communicated in the program solicitation—typically in the eligibility section. When cost sharing is required, the granting agency will provide the required percentage or amount and clearly specify what types of cost sharing are allowed to meet the requirement (such as cash, in-kind, or third-party contributions). The grant solicitation will also describe any pre-award requirements for submission of letters or other documentation to verify commitments to meet cost-match requirements.

Cost sharing commitments must be allowable under the specific program requirements. In addition, costs committed as match must:

- be allocable;
- not be committed as matching funds for another award; and
- not come from the same type of funding source as the grant award (e.g. not come from federal sources for federal grants or state sources for state grants).

City of Rockford Grant Policy

If a requesting department has any questions regarding the appropriateness of a proposed cost match, the department must contact the granting agency directly to get clarification before putting the commitment into the final proposed budget.

i. Mandatory cost sharing or matching

If a grant opportunity requires cost sharing or matching, the granting agency will usually require the types and amounts to be included in the proposed budget, and a description of the sources of match in the budget narrative. Sometimes grant recipients are not allowed to draw down award funds until all or a portion of the match has been met. If such a condition is described in the grant solicitation, departments must weigh whether the benefits of the award would outweigh the upfront costs associated with it.

Departments must make sure that match or cost sharing commitments do not become a problem during the management of an award due to improper documentation or fund management. Cost matching funds must be reported and must be able to be documented to the granting agency just as other grant-funded expenditures must be reported and documented.

ii. Voluntary cost sharing or matching

If the requesting department would like to *voluntarily* commit matching funds or commit matching funds in excess of what is required, this must be carefully considered. There are often benefits and risks to voluntary cost sharing. Departments must be aware that voluntary commitments entered on the budget form as contributions from the City or its partners become formal commitments, which are incorporated into the binding requirements of the grant award and are subject to audit.

iii. Third-Party Contributions Used as Match

Under the *Uniform Requirements*, third-party contributions may be used to meet match requirements if permitted by the granting agency. However, departments that commit these sources as a cost match must understand *when* they may be used and *how* to value them correctly, as provided in 2 CFR 200.306, 200.434, and any applicable funding agency regulations. Further, if a third-party contribution is committed and the City has included the specific third-party as a source of match, the department must require the third party to enter into a legally enforceable written agreement to provide the match prior to acceptance of the grant award. Departments must contact the Legal Department to obtain assistance with drafting and negotiating such agreements.

iv. City Commitments Beyond the Grant Term

Departments must not commit to a granting agency that City funds will continue to support a proposed grant project or program beyond the grant award period. This means that departments must not commit to continuation of grant-funded positions, activities, or services once the grant ends. Such budget appropriations will not have been approved

City of Rockford Grant Policy

by City Council and are, therefore, not permitted unless explicitly approved by City Council.

4. Program Income

Program income is defined as gross income earned by a grant recipient during the period of performance that is directly generated by a grant-supported activity or earned as a result of a grant award. Program income includes but is not limited to: income from fees for services performed, the use or rental of real or personal property acquired under a grant-funded project, and interest on loans made with award funds during the period of performance (for a complete list of sources see 2 CFR §200.80).

Granting agencies have autonomy in deciding how to handle program income. Generally, there are three methods of applying program income to a grant award under the *Uniform Requirements*:

- Deduction: Program income is deducted from the total allowable costs under the grant award. The program income becomes part of the granting agency award and the granting agency share is reduced by the program income amount.
- Addition: Program income is added to the grant award and the total budget increases by the amount of the grant award.
- Cost Sharing/Match: Program income may be used to meet the cost sharing or matching requirements of the grant.

The Deduction method is the method of default under the *Uniform Requirements* unless the awarding agency specifically authorizes applying one of the other two methods. It's important for departments to consider whether program income may be generated as a result of a proposed project or program so that it can be properly accounted for in the proposed grant budget. All program income must be accounted for during the performance period of a grant. Failure to disclose program income may result in it being treated as deductible by the granting agency, which will reduce the overall grant award.

c. Application Risk Assessments

The *Uniform Requirements* work to reduce waste, fraud, and abuse, in part through reducing the number of high risk awardees. Granting agencies may require applicants to complete a risk assessment questionnaire or an internal controls questionnaire as part of a grant application to achieve this end. Typically, the aim of a risk assessment is to evaluate the relative risk an applicant presents in its ability to compliantly and effectively manage an award, if granted. Often many of the questions on risk assessments relate to policies, procedures, and controls the applicant has in place to ensure compliant and effective management of the award.

If a requesting department is required to complete a risk assessment or internal controls questionnaire, please coordinate completion with the Grant Compliance Officer so that the answers provided are consistent with prior assessments submitted, and the answers accurately describe the City-wide policies, procedures, and controls in place. The Grant

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Compliance Officer will coordinate with the Accounting Manager when needed to assist the department in completing these forms.

d. Required Approvals for Grant Applications

Department staff who wish to submit a grant application must *always* obtain the approval of the Department Director and Finance Director prior to submitting the application (regardless of amount or whether the application is new or for grant renewal). Whether additional approvals are required hinges upon the following factors and are described in this section:

- whether the grant application requests funds totaling more than \$25,000;
- whether the grant application is 1) new 2) for renewal of a previously awarded grant with *no* change as to project, program, or city employment positions (“unmodified grant renewals”), or 3) for renewal of a previously awarded grant with proposed changes as to project, program, or city employment positions (“modified grant renewals”); and
- whether the granting agency requires proof of City Council approval as part of the grant application.

1. Pre-Assessment

All applications for new grants and modified grant renewals will require a pre-assessment in order for the department to move forward with preparing the application. The purpose of the pre-assessment will be to evaluate:

- alignment of the proposed grant activities with the City’s strategic priorities and the requesting department’s responsibilities;
- capacity of the requesting department to administer the programmatic, financial, and administrative aspects of the grant, if awarded;
- ability of the requesting department to meet any required cost match;
- sustainability of the project or program beyond the funding period; and
- total cost of the project or program weighed against the anticipated benefit to the City.

For grants of \$25,000 or less that require pre-assessment, the Department Director and Finance Director must approve in order for the department to move forward with preparation of the grant application. For grants over \$25,000 requiring pre-assessment, the Department Director, Finance Director, and City Administrator must approve in order for the department to move forward with preparing the grant application.

2. Application Approval for Grants \$25,000 or Less

The Department Director and Finance Director must approve all grant applications of \$25,000 or less prior to the department’s submission of the application to the granting agency.

City of Rockford Grant Policy

3. Application Approval for New Grants and Modified Grant Renewals over \$25,000

The Department Director, Finance Director, and City Administrator must approve all new grant applications and modified grant renewal applications of more than \$25,000 prior to the department's submission of the application to the granting agency. "Modified" means the department is proposing substantive changes to project, program, or City employment positions funded compared to the last grant awarded.

4. Application Approval for Unmodified Grant Renewals over \$25,000

The Department Director and Finance Director must approve all unmodified grant renewal applications of more than \$25,000 prior to submission to the granting agency by the department. "Unmodified" means the department is not proposing substantive changes to project, program, or City employment positions funded compared to the last grant awarded.

5. Application Approval by City Council

City Council approval to submit a grant application is not *required* unless the granting agency requires it as part of the City's application. However, if time permits, it is *recommended* that departments obtain City Council approval to apply for and accept a grant over \$25,000 prior submitting the application.

As described in Chapter 5, City Council must approve the acceptance of each grant award over \$25,000 and authorize the Mayor to execute the grant agreement on behalf of the City. Such approval should be granted in the form of a City Council resolution unless an ordinance is required by the granting agency. Departments may obtain City Council approval to accept the award at the time of application or before formal notice of the award is received. Therefore, when a grant application is presented to City Council for approval, departments are advised to also obtain City Council approval to accept the award and authorization for the Mayor to execute the grant agreement at the same time.

Before presenting to City Council for approval of a grant application or award acceptance, the department must first refer the item at City Council and receive Finance and Personnel Committee approval.

If a complete grant application is available, it should be presented to City Council when approval is requested. At a minimum, the department must present a memo or annual plan that includes the following information:

- granting agency and funding source;
- objectives of the grant-funded program or project and how funds will be used;
- grant term;
- amount of funds requested (or an estimate if the department is presenting an annual plan);
- matching fund requirement, if applicable;

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- amount of matching funds committed and the source of those funds (or an estimate of the amount and source if the department is presenting an annual plan); and
- reporting requirements (if known).

e. Submission of Grant Applications

After obtaining all required approvals, the requesting department is responsible for submitting the final grant application to the granting agency. After the application has been submitted, the requesting department must provide a copy to the Grant Compliance Officer for the central file. When City Council has approved the grant application and/or award acceptance, the department must also provide a copy of the City Council resolution or ordinance to the Grant Compliance Officer.

f. Grant Application Approval Summary

Applications for Grants **\$25,000 or less**

	NEW GRANTS or MODIFIED GRANT RENEWALS		UNMODIFIED GRANT RENEWALS	
	Pre-Assessment	Application	Pre-Assessment	Application
Department Director	✓	✓		✓
Finance Director	✓	✓		✓
City Council	X	✗ ¹		✗ ²

Applications for Grants **more than \$25,000**

	NEW GRANTS or MODIFIED GRANT RENEWALS		GRANT RENEWALS (no changes)	
	Pre-Assessment	Application	Pre-Assessment	Application
Department Director	✓	✓		✓
Finance Director	✓	✓		✓
City Administrator	✓	✓		X
City Council	X	✗ ³		✗ ⁴

^{1 - 4}: City Council approval to submit a grant application is not *required* unless required by the granting agency as part of the City's application. However, if time permits, it is *recommended* that departments obtain City Council approval to apply for and accept grants over \$25,000 prior to application submission.

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Chapter 4 Key Points

- Before signing any written instrument supporting a third-party grant application, department staff must obtain the approval of their Department Director.
- City staff who are asked by third party grant applicants to sign any written instrument that commits anything beyond general positive regard for the applicant or proposed activity must provide the instrument to the Legal Department for review prior to signing (common instruments are Letters of Support, Letters of Commitment, and Memoranda of Understanding).

CHAPTER 4: CITY PARTICIPATION IN THIRD-PARTY GRANTS

As discussed in the previous chapter, participating in a partnership to jointly pursue a grant opportunity is becoming the norm. An increasing number of grant programs expect a prime applicant to demonstrate in its proposal how it will leverage its relationships with other organizations and agencies in the community to form a multifaceted approach to achieving the goals and objectives of the grant.

Just as the City may seek to form these partnerships as a grant applicant, third parties may also contact the City to partner in their grant applications or grant-funded projects/programs. There are several written instruments that are often used to reflect grant-related partnerships. These include Letters of Support, Letters of Commitment, Memoranda of Understanding, and contractual agreements.

a. Letters of Support and Letters of Commitment

Typically, an instrument called a Letter of Support conveys a positive regard for a grant applicant, the applicant's work, or the applicant's proposed project or program. An instrument called a Letter of Commitment usually provides an organization's assurance that it will *participate* in the proposed project or program in some way. Letters of Support and Letters of Commitment are usually signed by one party and are typically not legally enforceable agreements. Nonetheless, they may contain commitments that are critical to the execution of a grant activity and department staff who are asked to sign Letters of Support or Letters of Commitment must be sure the Department Director is comfortable with the letter before signing it.

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b. Memoranda of Understanding

A slightly more formal commitment, often containing the signatures of multiple parties, might be documented in a Memorandum of Understanding (MOU). Granting agencies generally recognize an MOU as a more serious commitment than a Letter of Support. Despite this, instruments called MOUs are not usually legally enforceable agreements. Often granting agencies require an MOU as part of an application, but require that it be replaced by a contractual agreement if the grant is awarded before initiating grant-funded activities. Nonetheless, they may contain commitments that are critical to the execution of a grant activity and department staff that are asked to sign MOUs must be sure the Department Director is comfortable with the level of commitment described before signing it.

c. Contracts

Contracts represent legally binding, enforceable agreements between parties. In relation to grants, these are usually contracts for services or subaward agreements. Contracts always require Legal Department attorney review prior to signing.

d. Legal Review

There are essential elements required to make an agreement enforceable under law. In determining whether a written instrument is legally enforceable, the substance of the instrument is always more important than what it is called. Therefore, City staff who are asked by third parties to sign any written instrument that commits anything beyond general positive regard for a third-party applicant or activity must provide the instrument to the Legal Department for review by an attorney prior to signing it. The Legal Department will then advise as to whether the instrument is a legally binding contract, which will determine who may sign it and whether City Council approval is required.

City of Rockford Grant Policy

Chapter 5 Key Points

- Prior to accepting a grant award, City employees must follow the requirements of this chapter related to approval of acceptance.
- Third-party grant writers are also subject to the award acceptance requirements contained in this chapter.
- The Department Director, Finance Director and Legal Director must approve acceptance of every grant award. City Council must also approve acceptance of any grant award that exceeds \$25,000.
- The Mayor is the authorized signatory for City grant agreements totaling more than \$25,000, and does so after authorization has been given by City Council.
- The Department Director is the authorized signatory for City Grant Agreements totaling \$25,000 or less, and does so after Finance Director and Legal Director approval.
- Departments may preliminarily accept a grant award if required by the granting agency, so long as it does not require execution of a grant agreement.
- Departments that are required to complete risk assessments, internal controls questionnaires, or certifications prior to receiving a grant agreement must coordinate completion with the Grant Compliance Officer.
- After a grant agreement has been executed, the managing department must work with the Grant Compliance Officer to schedule a grant implementation meeting with relevant supporting departments to develop a grant implementation plan.

CHAPTER 5: GRANT AWARD ACCEPTANCE

When a department receives notice that a grant has been awarded, the department must comply with the policies contained in this chapter, including what approvals are needed for acceptance and who is authorized to execute the grant agreement on behalf of the City. Third-party grant writers are also subject to the award acceptance requirements contained in this chapter, in the event they receive the City's Notice of Award or manage the acceptance process.

a. Notice of Award

Granting agencies take a variety of approaches to notifying a grantee of an award. Agencies also vary in the processes they follow between notice of award and presenting

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the awardee with the official award documents (the grant agreement, approved budget, and deliverables). Sometimes a period of negotiation occurs between the notice of award and acceptance, and sometimes it does not. In some instances, the granting agency presents the awardee with a variety of documents to complete and sign before a grant agreement is offered. Each grant is different. This section is also intended to guide departments through some of the more common activities that occur prior to a grant agreement being presented to an awardee. Regardless, the requesting department must not expend funds it expects to be covered under the grant until all required approvals have been obtained internally and a grant agreement has been fully executed by both parties—the City *and* the granting agency. An exception to this requirement may be made if the granting agency has agreed to cover pre-award costs and the expenditure is approved by the Department Director and otherwise complies with existing City Purchasing Policies and Procedures, if applicable.

1. Preliminary Acceptance

Often a granting agency will send a preliminary letter or system notification of grant award to alert an applicant that an award will be forthcoming. These preliminary notifications are not the formal award documents. However, applicants may be required to “accept” the award in an online system such as the GATA Grantee portal or an agency’s award system in order move forward with receiving the formal award documents from the granting agency. If a department is required to do this, it may proceed with preliminary acceptance so long as it does not require any kind of execution of a grant agreement (electronically or in hard copy format). If the department has any question about whether it should proceed with preliminary acceptance, it should contact the Grant Compliance Officer or Accounting Division to obtain assistance before moving forward.

2. Risk Assessments, Questionnaires, and Certifications

Granting agencies may require that the City complete a variety of risk assessment questionnaires or compliance certifications after notice of award but prior to being offered a grant agreement for execution. This is often the case when the granting agency is a state pass-through agency awarding federal funds. Typically, the aim of a risk assessment is to evaluate the relative risk an applicant presents in its ability to compliantly and effectively manage an award. Often many of the questions on risk assessments relate to policies, procedures, and controls the applicant does or does not have in place to ensure compliant and effective management of the award. Certifications are usually intended to assure the granting agency that the City is in compliance with applicable agency regulations.

If a department is required to complete any type of risk assessment, internal controls questionnaire, or certification, please coordinate completion with the Grant Compliance Officer so that the answers provided are consistent with prior assessments submitted and they accurately describe the City’s policies, procedures, or compliance. The Grant Compliance Officer will coordinate with the Accounting Manager and other departments when needed to assist the department with completing these forms.

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b. Authorized Signatory for City Grant Agreements

The Mayor is the only authorized signatory for City grant agreements totaling more than \$25,000, and will only execute these agreements after Department Director, Finance Director, Legal Director, and City Council approval. In emergency situations, the Mayor may authorize a designee to sign after the required approvals have been obtained. Such designation must be made in writing.

The requesting Department Director is the only authorized signatory for City Grant Agreements totaling \$25,000 or less, and may only execute these agreements after Finance Director and Legal Director approval. In emergency situations, the Department Director may authorize a designee to sign after the required approval have been obtained. Such designation must be made in writing.

c. Department Director, Finance Director, and Legal Director Approval

1. Department Director Approval

Often, months pass between the submission of a grant application and a notice of award. When a department receives a notice of award and is presented with the grant award documents by the granting agency, the Department Director and staff who will manage the award must review them carefully to be sure the department is still willing and able to execute the project or program as proposed. This should include a thorough review of the original proposal, approved budget, and expected deliverables. If there were partnerships presented as part of the grant proposal, the department must contact all partners to make sure they are still interested in participating. The Department Director and staff must also read the grant agreement, including all terms and conditions of the award. If the Department Director wishes to proceed with grant acceptance after reviewing the award documents, he or she must approve award acceptance. The Grant Compliance Officer will then coordinate Finance Director and Legal Director and review, and will document all required approvals.

2. Finance Director Approval

The Finance Director must approve the acceptance of a grant award before City Council review or before the grant agreement may be executed, depending upon the amount of the award. The Finance Director's review will focus primarily on the grant budget.

3. Legal Director Approval

The Legal Director must also approve the acceptance of grant award before City Council review or before the grant agreement may be executed, depending upon the amount of the award. The Legal Director's review will focus on the terms and conditions of the grant agreement. While grant agreements are often non-negotiable, the Legal Director or a designated City Attorney must review the terms and conditions of these agreements to ensure that the City is in compliance with all applicable statutes and agency regulations referenced, and that the agreement does not contain unduly burdensome provisions that warrant further consideration before the City enters into the agreement. Often, there

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are many strings attached to a grant award in the form of granting agency regulations that extend well beyond the project or program funded. Compliance with all of the applicable laws and regulations referenced in the grant agreement may require extensive City resources and/or changes to City policy that must be fully considered before signing the grant agreement.

d. City Council Approval

As described in paragraph b. of this chapter, the Department Director, Finance Director, and Legal Director must approve the acceptance of all grant awards.

If a grant award is \$25,000 or less, the Department Director may execute the grant agreement *after* the Finance Director and Legal Director have approved. City Council approval is not required.

If a grant award exceeds \$25,000, City Council must also approve acceptance of the award after the Department Director, Finance Director, and Legal Director have done so. City Council approval should be granted in the form of a City Council resolution unless an ordinance is required by the granting agency.

As described in Chapter 3, departments *may* obtain City Council approval to accept a grant award before formal notice of the award is received (often at the time of application). For departments that are funded significantly through grants, such as the Human Services and Community Development Departments, this may be done at the time the department's annual plan is reviewed by City Council.

1. If City Council Approved Grant Award Acceptance Before the Notice of Award was Received (Grants Over \$25,000)

If City Council has already approved acceptance of the grant before the department receives actual notice of the award, the department may proceed with sending the grant agreement to the Mayor for execution *after* the Department Director, Finance Director, and Legal Director have approved it.

In these instances, the department must still report the grant award and acceptance to City Council with an *information-only memorandum*, which should include the following information:

- granting agency and funding source;
- objectives of the grant-funded program or project and how funds will be used;
- grant term;
- amount of funds awarded;
- amount of matching funds committed and the source of those funds (if applicable); and
- reporting requirements.

The department should also provide a copy of the grant agreement.

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2. If City Council Has Not Yet Approved Award Acceptance (Grants Over \$25,000)

If City Council has not approved acceptance of the grant award at the time the department receives notice of the award, the department must obtain City Council approval *after* the Department Director, Finance Director, and Legal Director have approved it.

Before presenting to City Council, the department must first refer the item at City Council and receive Finance and Personnel Committee approval. When doing so, the department must present a memo to the Finance and Personnel Committee and City Council that includes the following information:

- granting agency and funding source;
- objectives of the grant-funded program or project and how funds will be used;
- grant term;
- amount of funds awarded;
- amount of matching funds committed and the source of those funds (if applicable); and
- reporting requirements.

The department should also provide a copy of the grant agreement.

e. Grant Agreement Execution

After all required approvals have been obtained, as described in this chapter, the Mayor (for grants over \$25,000) or requesting Department Director (for grants \$25,000 and under) may sign the grant agreement on behalf of the City. The managing department is responsible for returning the executed agreement to the granting agency and providing a copy of the fully executed grant agreement to the Grant Compliance Officer for the central file.

f. Grant Implementation Plan

All departments that receive grant funding must work with the Grant Compliance Officer to schedule a grant implementation meeting for the purpose of developing a Grant Implementation Plan. The Plan will identify goals and objectives to be achieved, timelines, roles and responsibilities, reporting requirements, and will take into account granting agency terms and conditions. The purpose of the Plan will be to ensure that grant-funded programs and projects are managed according to the terms set forth in the grant agreement, the City of Rockford Grant Policy, and other applicable City policies and procedures. The Grant Compliance Officer will schedule the Grant Implementation Meeting, which shall include representation from the managing department, Finance Department, Legal Department, and any other appropriate departments, depending upon the details of the grant (for example, Human Resources should be included if the grant provides for new City staff).

The following items shall be addressed at the meeting:

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- identification of the grant Project Manager and Award Manager
- assignment of an accounting identifier that must be used for all grant-related expenses and grant payments recorded in MUNIS
- review of all requirements and conditions of the grant agreement;
- review of the approved grant budget;
- review of subaward and contract requirements (if applicable) under the award;
- review of equipment management requirements (if applicable) under the award;
- review of the grant reporting requirements and deadlines;

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Chapter 6 Key Points

- The managing department is responsible for insuring that a grant-funded project or program is administered consistently with the grant's objectives; that grant funds are used according to the approved application and budget; and for managing the grant in accordance with the grant agreement, agency regulations, and all applicable City policies. This is the case even when the department engages a third party consultant to manage or help manage the grant.
- Managing departments must be aware of the cost principles that apply to the specific grant they are managing. This means departments must understand what is required for a grant cost to be allowable and allocable.
- Managing departments must obtain written approval by the granting agency for deviations from the approved grant budget or program/project plans *prior* to implementing a change or incurring unbudgeted costs.
- Managing departments must maintain a record with certain information for grant-funded equipment (see paragraph e).
- Managing departments must be careful to follow the policies in this chapter related to disposition of grant-funded equipment and supplies.
- Managing departments must understand the distinction between a procurement contract and a subaward arrangement (see paragraph f).
- Managing departments must comply with the City's Purchasing Policies and Procedures, and Minority and Women Business Enterprise Procurement Policy when engaging in grant-funded procurement, even when federal procurement rules are less restrictive.
- Managing departments are responsible for understanding grant reporting requirements and must ensure that all performance and financial reports are completed and submitted to the granting agency on time. A copy of all reports must be provided to the Grant Compliance Officer.
- Job postings for grant-funded positions must clearly explain that the position is funded through a grant and may be subject to elimination when grant funding expires.
- Managing departments must keep documentary support for staff time and effort charged to grants.
- Grant records must be retained for three years after the date the final financial expenditure report is submitted *unless* the City's Local Records Disposition Schedule requires retention for a longer period.
- Managing departments must work with the Accounting Division to ensure that unused balances of grants paid in advance are returned to the granting agency.

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CHAPTER 6: GRANT MANAGEMENT

Once grant funding is awarded and accepted, the managing department is responsible for insuring that a grant-funded project or program is administered consistently with the grant's objectives; that grant funds are used according to the approved application and budget; and for managing the grant in accordance with the grant agreement, agency regulations, and all applicable City policies. This is the case even when the department engages a third party consultant to manage or help manage the grant.

a. The Strings Attached to Federal Grants

When the federal government awards grants either directly or passed through a state agency, it attaches many conditions to the award that may extend even beyond the grant-funded activity. Federal granting agencies often have regulations connected to public policy, and seek to enforce certain federal laws and executive orders related to, for example, civil rights, nondiscrimination, lobbying, a drug-free workplace, etc. By accepting grant funds, the City agrees to be bound by *all* of these requirements, which are typically referenced in the grant agreement. It is important that departments do not overlook the importance of complying with these other requirements, and do not assume that the City is already in compliance with the various granting agency public policy regulations. This is why Legal Department review of the grant agreement, before it is signed, is critical. The consequences for violating these public policy requirements can include the withholding of federal funds, suspension, or even debarment from eligibility for future grants. Consequences can extend beyond a particular department to the City as a whole.

b. Managing Grant Costs (Expenses)

1. Financial Accounting vs. Cost Accounting

Financial accounting involves a system of tracking revenue and expenses to provide an overview of an entity's financial position. It includes preparation of revenue and expenditure reports, financial statements, statements of cash flow, and more. It does not involve budget decisions about the daily running of business or a project or program. While financial accounting is important as it relates to proper tracking of grant revenue and expenses in the City's financial system, it is only one part of grant accounting.

With the implementation of the *Uniform Requirements*, cost accounting has become an increasingly important element of grant accounting. Cost accounting provides a system or method so those who manage the grant can make decisions about implementing a grant-funded project or activity by tracking the costs that are allowed charged to the grant. It is important that grant Project Managers and Award Managers understand the cost principles that apply to grants. These principles serve as the basis for the allowability of grant expenditures. Attention must be paid to the type of cost and whether or not it is necessary, reasonable, allocable to the grant activity, charged to another grant activity, and adequately documented. If an expense is disallowed by a granting agency, the City will be required to bear the cost of the disallowed expense.

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2. The Federal Cost Principles

The cost principles contained in Subpart E of the *Uniform Requirements* are applicable to most grant recipients and types of grants. Subpart E lists allowable items of cost, provides the principles for allowability of those costs, requires grant recipients to exercise sound management practices in the administration of grant awards, and to conduct grant-related activities in a manner consistent with the underlying grant agreement program objectives. The allowability of approximately 55 items of cost are contained in 2 CFR §200.42-200.475.

In addition, the Uniform Requirements provide 22 instances when a grant recipient needs prior written approval from a granting agency for select costs in order for them to be allowable (see 2 CFR §200.407). Generally, sticking closely to the approved grant budget assures that such written approval has been secured. However, two very important categories of cost that require prior written approval from the granting agency are revision of budget and program plans and subawards. Revisions are discussed in more detail in paragraph d. of this chapter and subawards are discussed in Chapter 7.

The cost principles contained in the *Uniform Guidance* have generally been adopted by all federal granting agencies and state agencies, but some may have regulations that contain more restrictive requirements. Additional restrictions for allowability of costs may be included in the grant agreement. Thus, departments must be aware of the cost principles that apply to a specific grant and specific items of cost. The rule of precedence is that the most restrictive cost provisions prevail.

One exception to the application of cost principles to the allowability of costs is for a “fixed amount award.” This award type dictates that accountability is based on performance and results rather than specific costs. However, even fixed amount awards are negotiated using cost principles or other pricing information as a guide.

3. Cost Allowability

Generally, in order for a direct cost to be allowable, it:

- must be necessary, reasonable, and allocable to the grant award;
- must comply with any limitations set by the granting agency;
- must be consistently treated by the City as either a direct or an indirect cost across awards received by the City;
- must not already be included as a cost under any other grant program;
- must not also be used to meet the cost matching requirements of any other federally-financed or state-financed program, respectively (if it is a state grant, a direct cost cannot have been used to meet the cost match requirements of another state award; if it is a federal grant, a direct cost cannot have been used to meet the cost match requirements of another federal award); and
- must be adequately documented.

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In sum, a cost is usually allowable when it is reasonable, allocable, consistently treated, not charged elsewhere, and not excluded or limited by the granting agency.

A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances.

A cost is allocable to a grant award if the goods or services involved are chargeable or assignable to the award in accordance with the benefits received. This standard is met if the cost is incurred specifically for the grant award or it benefits both the grant award and other work of the grant recipient and can be distributed in approximated proportions using reasonable methods.

c. Cost Match Allowability

When cost sharing falls short of what is required under the grant award, the granting agency could require that a portion of the grant funds paid be returned. Departments must be diligent in ensuring that costs incurred as a match are allowable. If a cost match is disallowed, the City may be required to return grant funds to meet the match percentage requirements of the grant award.

The principles that apply to cost match allowability are substantially the same as the principles for direct cost allowability. Cost match contributions:

- must be necessary and reasonable for accomplishment of the project or program funded;
- must be as described in the approved grant budget;
- must be documented and verifiable from the City's records;
- must not also be counted as cost match under a different grant award;
- must not also be charged as direct costs under any other federal or state grant award, respectively (if it is a state grant, a cost match cannot be paid for with other state funds; if it is a federal grant, a cost match cannot be paid for with other federal funds); and
- must comply with any cost limitations set by the granting agency.

One of the most common issues with cost match allowability relates to lack of documentation of third-party in-kind contributions used as cost match. Department staff who manage a grant where third-party in-kind contributions are used must ensure that these contributions are well-documented and that records reflect how the valuation was determined.

d. Changes Requiring Granting Agency Prior Approval

The foundation of a grant award is the budget, scope of work, and the personnel carrying out the work. City staff who manage a grant award must obtain written approval by the granting agency for deviations from the approved grant budget or program/project plans *prior* to implementing a change or incurring unbudgeted costs. Granting agency written approval must be obtained for:

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- new costs not included in the budget
- a change in the scope or objective of the project (with or without budget changes);
- a change in key personnel specified in the grant award;
- disengagement from the project for more than three months or a 25% reduction of time spent on the project by the project director;
- subawarding, transferring, or contracting out any of the work under the grant that was not described as being subawarded, transferred, or contracted for in the application or approved award; and
- a change in cost-sharing or matching amounts or sources from what was approved in the budget.

Any expense incurred without granting agency approval, when required, is considered the responsibility of the City to pay for. As a result, departments must make sure they are very attentive to the requirement that budget changes are approved in writing by the granting agency before an expense obligation is incurred.

Generally, the transfer of funds among direct cost categories is permissible so long as the cumulative amount of such transfers does not exceed 10% of the total approved budget. However, City staff must be very careful when doing this, and must be sure that the federal awarding agency has not further restricted the transfer of funds among categories. It is always a good idea to obtain written guidance from the granting agency's Grant Manager before transferring funds among categories.

While granting agencies do not typically require reporting by line item within a grant budget, department staff who manage grant awards must be aware that *all expenditures* charged to an award are subject to audit or desk review by the agency.

e. Property Management and Disposition (Equipment and Supplies)

1. Federal Definition of Equipment vs. Supplies

The most common types of property that are funded by grants as direct costs are equipment and supplies. Equipment is defined by the *Uniform Requirements* as tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost of \$5,000 or more. Supplies are defined as tangible personal property that is not otherwise considered equipment. It should be noted that a computing device is a supply if the acquisition cost is less than \$5,000, regardless of the length of its useful life. The *Uniform Requirements* and most granting agency regulations implementing the *Requirements* dictate how this type of property must be managed and disposed of once it is no longer useful.

2. Management of Equipment

Grant-funded equipment must be kept in good condition and City staff must ensure that it is adequately secured. An equipment record must be maintained for each item of equipment, which must include the following information:

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- a description of the equipment;
- the manufacturer's serial and model number or other unique identification number;
- source of funding for the equipment, including the grant or agreement number;
- whether title rests with the City or granting agency;
- unit acquisition date and cost;
- percentage of granting agency participation in the project or program for which the equipment was acquired;
- location, use, and condition of the equipment and the date the information was reported (location, use, and condition must be updated bi-annually); and
- date of disposal, sale price, or method used to determine fair market value where the City has disposed of and compensated the granting agency for its share.

The department must conduct a physical inventory of all grant-funded equipment and reconcile the results with the equipment record every two years. The inventory should verify the existence, current use, and continued need for the equipment. The City must retain equipment records for three years after disposition of the equipment unless the City's Local Records Disposition Schedule requires retention for a longer period.

3. Disposition of Equipment

Grant-funded equipment must be used as long as it is needed to further the purpose of the grant award. During the term of the grant award, the grant recipient may make the equipment available for shared use, so long as it does not interfere with the grant-funded project need. When the equipment is no longer needed for the original purpose, it may be used for other projects funded by the granting agency or, if none, by any granting agency. When the equipment is no longer needed by the City, the equipment must be disposed of according to the instructions provided by the granting agency. If no specific instructions are provided, the guidance contained in this section must be followed.

After the grant term, the City can sell equipment that is no longer needed (following the policies and procedures outlined in the City's Purchasing Manual) without compensating the granting agency ONLY IF the current market value of the unit of equipment is less than \$5,000. If the equipment is worth \$5,000 or more, the City must pay the granting agency its share of the market value of the equipment or do one of the following, at the direction of the granting agency:

- Sell the equipment and deduct and retain \$500 or 10% of the proceeds, whichever is less, for the City's selling costs;
- Transfer title to the granting agency; or
- Take disposition of the equipment upon direction of the granting agency.

In the absence of specific granting agency instructions concerning disposition of the equipment within 120 days after the end of the financial support for the grant-funded

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project, the City may either retain or sell the equipment and pay the granting agency its share of the market value.

4. Disposition of Supplies

If an inventory of supplies with a market value exceeding \$5,000 exists at the end of a grant term and if the supplies are not needed for any current or previously funded federal grant project (in the case of federal direct or pass-through awards), the City may retain the supplies for use in other City activities. However, the City may not sell the supplies without paying the federal agency its fair share in the same manner as is described in paragraph 3 for equipment. If the value of the grant-funded supplies is \$5,000 or less at the close-out of the grant, the City may either retain or sell the supplies without compensating the granting agency.

f. Subawards vs. Procurement Contracts

Often the City will receive a grant for a project or program for which it does not have the internal personnel or resources needed to adequately fulfill the grant objectives. As a result, the City must engage outside entities to provide products or services. These will be obligated in the form of either a *procurement contract* or *subaward* funded by the grant. Both require a written agreement. However, it is incredibly important for department staff who manage grants to understand the distinction between procurement contracts and subawards because there are specific and distinct requirements that apply to each.

1. Distinguishing between Subawards and Procurement Contracts

A subaward is a grant award provided by a grant recipient (also called a pass-through entity) to a subrecipient for the purpose of assisting the recipient in carrying out part or all of the grant-funded award activities. It does not include payments to a contractor or payments to an individual that is a beneficiary of a funded program. Sometimes the entity holds a competitive process to make a subaward, and sometimes the subaward is treated as a sole source type of contract. This will largely depend upon the grant requirements and the granting agency's determination.

A procurement contract is purchasing arrangement whereby a grant recipient purchases property, goods, or services it needs to carry out the grant-funded project or program.

Definitions alone may prove insufficient when trying to determine whether a particular entity will serve as a subrecipient (also called a subawardee) or contractor. However, the *Uniform Requirements* provide additional helpful characteristics of each to support the correct classification (see 2 CFR §200.330).

Characteristics that support classification of an entity as a subrecipient include:

- The entity determines who is eligible to receive assistance under the project or program;
- The entity has its performance measured in relation to whether objectives of the funded project or program were met;

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- The entity has responsibility for programmatic decision making;
- The entity uses award funds to carry out a program for a public purpose specified in the authorizing statute, as opposed to providing goods or services for the benefit of the recipient (pass-through entity); and
- The entity is responsible for adherence to applicable program requirements specified in the award.

Subrecipients maintain *a state or federal assistance relationship with the granting agency*. Grant obligations and grant award terms and conditions are *passed through* the recipient (the City) to the subrecipient.

Characteristics that support identification of an entity as a contractor include:

- The entity provides the applicable goods or services as part of its normal business operations;
- The entity provides similar goods or services to many different purchasers;
- The entity normally operates in a competitive environment;
- The entity provides goods or services that are ancillary to the operation of the funded project or program; and
- The entity is generally not subject to the compliance requirements of the funded project or program.

Contractors maintain *a procurement relationship with the City*. When engaging contractors, City staff must follow the City's procurement-related ordinances, policies, and procedures.

2. Subawards Must be Approved by the Granting Agency

The City's ability to make subawards must be included in the approved federal award, or the City must obtain prior written approval from the granting agency before subawarding funds. Sometimes, determining whether such approval has been given is confusing; the entity may be included in the grant proposal and approved grant budget, but the granting agency may not have explicitly approved the arrangement as a subaward. The determination and prior approval is of critical importance. Therefore, if you are at all unsure whether you are dealing with a subaward or contract, consult the granting agency Grant Manager who has been assigned to the grant to discuss the determination.

3. Managing Subawards

Subawards require extensive resources to manage, from risk assessment to the drafting of the Subaward Agreement to departmental monitoring of the subrecipient for compliance with the terms and conditions of the grant award. Department staff who manage a grant that has subwards must be prepared to dedicate time and effort to this, well beyond what would be required of a contractor. Chapter 7 of these Policies provides important requirements related to managing subawards.

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g. Procurement Under Grants (Contracts and other Purchases)

All procurement activity associated with grants must comply with the City's Purchasing Ordinance, Purchasing Policies and Procedures, and Minority and Women Business Enterprise Procurement Policy. These City policies and procedures are in line with the Procurement Standards contained in §200.318-200.321 of the *Uniform Requirements*. In some instances, the City's policies may be stricter than the *Uniform Requirements* or granting agency regulations. In those instances, City policies must still be followed.

There are certain contract provisions that must be included in City contracts funded by federal grant awards. When the value of any such contract exceeds the \$25,000 threshold and must be publicly advertised, those provisions are included in the City's template RFP or call for bids documents. When department staff seek to award a grant-funded contract under the \$25,000 threshold, they must first contact the Grant Compliance Officer, who will coordinate Legal Department review to ensure the contract contains all necessary provisions.

There may be additional specific grant conditions that govern grant-funded contracts. Department staff managing the grant must make the Central Services Division aware of such conditions so that any bid or proposal solicitation may be handled accordingly, when needed. When any grant-funded procurement contract is presented before City Council for approval, department staff must ensure that the corresponding memorandum identifies the particular grant funding source for the contract.

h. Grant Reporting

Assigned department staff who manage a grant award are responsible for understanding the grant reporting requirements and must ensure that all performance and financial reports are completed and submitted to the granting agency on time and in accordance with the requirements. Failure to submit timely reports reflects poorly on the City as a whole. Failure to submit reports can result in the withholding of grant payment advances or reimbursements, or suspension or termination of the grant award. As a result, the Grant Compliance Officer will also track the submission of grant reports to support timely completion. The grant Project Manager must provide the Grant Compliance Officer with a copy of *all grant reports* submitted to the granting agency immediately after they have been submitted. The Grant Compliance Officer will save a copy to the central file, and will ensure that a copy of all financial reports is provided to the Accounting Division.

Deadlines for federal reports are often predictable and are as follows:

- Annual reports are due 45-90 calendar days after the reporting period;
- Quarterly reports are due 15-30 days after the reporting period;
- Semi-annual report are due 15-30 days after the reporting period; and
- Final reports are due 45-90 days after the period of performance (grant term) has ended.

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However, granting agencies may dictate a more or less frequent reporting structure and different deadlines, or they may approve deadline extensions. The grant agreement typically specifies the reporting requirements, but department staff who manage the award should not hesitate to contact the granting agency to obtain clarification if needed.

i. Grant-Funded Employment

Job postings for grant-funded positions must clearly explain that the position is funded through a grant and may be subject to elimination when grant funding expires. City staff positions that are fully funded by a grant must be tied in the payroll system to the accounting identifier assigned to that grant.

j. Staff Time and Effort Tracking

Compensation for City staff time is often included in approved grant budgets. City staff must be aware that an absence of adequate documentation on compensation or time spent can serve as a basis for disallowing these costs, even when they are in the approved grant budget.

For federal awards, the *Uniform Requirements* do not mandate a single approach to time and effort documentation—though granting agencies may have their own regulations that dictate a specific approach. Absent specific direction by the granting agency, department staff who manage grants covering staff compensation must exercise judgment in developing documentary support for the staff time and effort expended on grant-funded activities. The granting agency expects that this documentation remains available, and may request it be provided at any time. The following should serve as guidance for maintaining time and effort documentation:

- Time and effort reports should reflect an after-the-fact distribution of the actual activity of the employee (staff cannot rely on prospective estimates of time that will be spent);
- Time and effort reports should account for total compensated activities so that the correct percentage of time and effort can be attributed to the grant-funded program or project;
- Time and effort reports should be prepared at least monthly and should coincide with pay periods;
- Time and effort reports must be signed by the employee or supervisor who has first-hand knowledge of work performed by the employee.

Often, a granting agency will have a time and effort report template available if it is not explicitly required. Department staff should ask the granting agency about appropriate time and effort documentation at the outset of a grant period so that there is no misunderstanding as to expectations regarding proper documentation.

k. Recordkeeping Requirements

City staff must maintain and retain all grant-related financial and program records, supporting documents, and other records pertinent to the grant during the grant period

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and for three years after the date the final financial expenditure report *unless* the City's Local Records Disposition Schedule requires retention for a longer period or the granting agency extends the retention period. The three-year retention requirement also extends to subrecipients, contractors, and subcontractors.

The granting agency, Government Accountability Office (for federal direct and pass-through grants), and pass-through agencies and their authorized representatives have the right to access grant-related records. These access rights do not expire at the end of the retention period; authorized officials have access rights for as long as the records are retained by the City.

I. Grant Closeout

Grants are typically ready for closeout on the date the grant period (also referred to as the grant term or period of performance) ends. During closeout, the granting agency verifies that the recipient has completed all administrative actions and all required work under the grant. Key features of the grant closeout are:

- submitting all final performance, financial, and other reports to the granting agency;
- adjusting the federal share of costs upward or downward, if necessary;
- settling any cash balances;
- accounting for any property acquired with grant funds;
- closing out the award in the local and granting agency accounting systems.

Department staff who manage the grant must work with the Accounting Division to ensure that unused balances of grants paid in advance are returned to the granting agency. They must also work with the Accounting Division to ensure that all payments and expenses made under the grant have been properly accounted for and assigned to the grant accounting identifier in MUNIS before the project is closed. Expenses must not be incurred after the grant award period has ended.

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Chapter 7 Key Points

- The terms and conditions of a federal award flow down to subawards issued by the City as recipient. The subaward agreement the City enters into with the subrecipient must contain these terms and conditions.
- City subrecipients must be registered in the System for Award Management (SAM) and/or the Grant Accountability and Transparency Act (GATA) Grantee Portal, depending on the source of funding.
- Managing departments must conduct a risk assessment of the subrecipient prior to making a subaward.
- Managing departments must monitor subrecipients during the term of a subaward.
- All subawards must be memorialized in a subaward agreement, following the required approvals described in this chapter.
- First-tier federal subawards of \$25,000 or more must be reported in the FFATA Subaward Reporting System (FSRS) no later than the end of the month that follows the month the subaward agreement is executed. The Grant Compliance Officer is responsible for maintaining the central FFATA reporting function for all direct federal grants received by the City.

CHAPTER 7: SUBAWARD MANAGEMENT

Chapter 6 on Award Management contains important guidance and policies on determining whether the engagement of a third party to provide goods or services should be considered a procurement contract or a subaward arrangement. As described in Chapter 6, subawards must first be approved in writing by the granting agency before the City may move forward with the subaward, following the guidance and policies contained in this chapter.

Even when the City's issuance of a subaward is approved by the granting agency, there are extensive requirements the City must follow in managing the subaward. In addition to meeting the grant requirements as a direct recipient, the City must simultaneously act as a granting agency itself, imposing the same requirements on the subrecipient as the City must follow as direct recipient. The City must also follow certain provisions of the *Uniform Requirements* applicable to pass-through entities.

a. Flow-Down of Grant Award Terms and Conditions to Subrecipient

The *Uniform Requirements* explicitly state that the terms and conditions of a federal award flow down to subawards to subrecipients unless a particular section of the *Uniform*

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Requirements or the grant agreement state otherwise. This means that subrecipients, for the most part, must comply with all of the regulations the City does as recipient.

b. Requirements of the City as Pass-Through Entity

Grant recipients are accountable for managing *all* of the activities of the award, even when it engages a third party to conduct some of these activities. For federal grant awards, pass-through entities must generally comply with the requirements described in the *Uniform Requirements* §200.331 entitled “Requirements for pass-through entities.” As a reminder, a federal granting agency may deviate from the *Uniform Requirements* in their implementing regulations, so it is always a good idea to check those regulations to be sure that there are no additional requirements that may apply. This section, in addition to addressing other requirements, summarizes the requirements for pass-through entities contained in §200.331.

1. Verify Subrecipient’s Registration in Grantee Systems

Just as the City must be eligible to receive state and federal grant awards through registration in the System for Award Management (SAM) and the Grant Accountability and Transparency Act (GATA) Grantee Portal, so too must the subrecipients the City engages to carry out its awards. If the City’s grant is a direct federal grant, the subrecipient must have an active SAM registration. If the City’s grant is a federal grant passed through a state agency, the subrecipient must be registered in both SAM and the GATA Grantee Portal. If the City’s grant is awarded by a state agency using state-appropriated funds only, the subrecipient must be registered in the GATA Grantee Portal. Pass-through entities are prohibited from making subawards to entities that have been suspended, debarred, or otherwise deemed ineligible to participate in federal or state assistance. A subrecipient’s valid registration in these systems provides assurance to the City that the subrecipient is not suspended, disbarred, or ineligible before issuing a subaward through formal agreement.

2. Conduct a Risk Assessment

Just as the granting agency conducts a risk assessment for the City, the City as a pass-through entity must conduct a risk assessment of the subrecipient prior to making the subaward. The risk evaluation should focus on potential noncompliance with statutes, regulations, and other terms and conditions of the award. The results of the risk assessment inform how the City should monitor the subrecipient during the subaward period.

Department staff managing the grant award are responsible for conducting this risk assessment, with the support of the Grant Compliance Officer who can provide a standard risk assessment form that may be modified based on the terms and conditions of the award.

- i. The following should be considered when evaluating the risk posed by a subrecipient:

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- subrecipient's experience with similar grant awards or subawards;
- subrecipient's financial stability
- subrecipient's history of performance in managing grants
- results of subrecipient's previous audits;
- subrecipient's staffing changes or any changes in systems; and
- subrecipient's ability to effectively implement statutory, regulatory, or other requirement imposed under the award.

ii. If department staff determine the subrecipient presents some heightened level of risk, the following special conditions should be considered to be included in the Subaward Agreement:

- withholding authority to proceed to the next phase of a project until receipt of evidence of acceptable performance within a given period of performance;
- requiring additional, more detailed financial reports than may be required under the City's grant award;
- requiring additional project monitoring;
- requiring subrecipient to obtain technical or management assistance; or
- establishing additional prior approvals.

3. Conduct Monitoring

The City is responsible for monitoring the subrecipient's activities to ensure that the subaward is used in accordance with the requirements set forth in the subaward agreement. The risk assessment and the activities to be conducted by the subrecipient should dictate the City's approach to monitoring.

Department staff managing the award are responsible for conducting subrecipient monitoring. Staff who have questions or need advice on monitoring should contact the Grant Compliance Officer.

- i. The following monitoring activities *must* be conducted by department staff managing the award:
 - Review the financial and performance reports submitted to the City by subrecipient and obtain documentation of expenditures and funded staff time and effort (often referred to as a "desk review"); and
 - Follow-up to ensure that subrecipient takes timely and appropriate action on any deficiencies identified through audits, risk assessments, site visits, or other means.
- ii. The following additional monitoring activities *should be considered* by department staff managing the award, depending upon the risk assessment results and the activities performed by the subrecipient:

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- Provide subrecipients with training and technical assistance on program-related matters; and
- Perform on-site reviews of the subrecipient's program operations.

If a subrecipient fails to comply with the terms and conditions of the subaward, the City must take appropriate action. The following remedies are available under the *Uniform Requirements* §200.338 and may be taken at the discretion of the managing department in consultation with the Legal Department if needed:

- temporarily withhold cash payments pending correction of the deficiency by the non-Federal entity or more severe enforcement action by the Federal awarding agency or pass-through entity;
- disallow (that is, deny both use of funds and any applicable matching credit for all or part of the cost of the activity or action not in compliance);
- wholly or partly suspend or terminate the subaward;
- recommend to the federal awarding agency the initiation of suspension or debarment proceedings, as authorized under 2 CFR part 180 and federal awarding agency regulations; and/or
- withhold further subawards for the project or program.

The managing department may take other action legally available, in consultation with the Legal Department.

4. Provide Information to Subrecipient in the Subaward Agreement

For federal awards (either direct or passed through), the City must provide the best information available to the subrecipient to describe the federal award. As described in the next section, this information should be documented in the subaward agreement. Required information includes:

- i. federal award identification;
 - (C) subrecipient's name (the exact name associated with its duns number)
 - (D) subrecipient's duns number
 - (E) federal award identification number (fain)
 - (F) federal award date (for direct federal awards only—this is the date when the original federal award agreement is signed by the authorized official of the federal awarding agency)
 - (G) subaward performance period start and end date
 - (H) amount of funds committed by the city to the subrecipient
 - (I) award project description
 - (J) name of federal awarding agency
 - (K) name / contact information for City employee managing the subaward
 - (L) Catalog of Federal Domestic Assistance (CFDA) number and name
 - (M) indirect cost rate for the City's award, if applicable

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Items (C), (D), (G), (H), and (J) should be located in the grant agreement between the City and the granting agency, even if the granting agency is a state pass-through agency. The remainder of the information should be provided by department staff managing the subaward.

- ii. all requirements imposed by the pass-through entity (City) on the subrecipient so that the subaward is used in accordance with all applicable statutes, regulations, and the terms and conditions of the grant award;
- iii. any additional requirements the City wishes to impose in order to meet its responsibilities to the awarding agency including identification of any required financial and performance reports;
- iv. the subrecipient's negotiated indirect cost rate or *de minimis* rate if it is charging indirect costs under the subaward;
- v. the requirement that subrecipient must permit the City and auditors to have access to the subrecipient's records and financial statements as necessary; and
- vi. appropriate terms and conditions concerning the closeout of the subaward.

c. The Subaward Agreement

All subawards must be memorialized in a subaward agreement, executed by the subrecipient and the City. Subaward agreements totaling \$25,000 or less may be approved by the Department Director after approval by the Legal Director. The Department Director is the authorized signatory for these agreements. Subaward agreements totaling more than \$25,000 must be approved by City Council after Legal Director approval. The Mayor is the authorized signatory for subaward agreements totaling more than \$25,000.

The subaward agreement is the City's most important tool for managing subawards. In drafting a clear agreement, the City is able to meet the many pass-through entity requirements specified in the *Uniform Requirements* and ensure that the subrecipient will carry out the subaward in compliance with the grant terms and conditions.

Subaward agreements must contain certain core components, described in paragraph (4) of this chapter. However, each agreement must be uniquely tailored to the specific terms and conditions of the grant agreement between the City and the granting agency. It must also contain a scope of work and budget that is specific to the details of the subaward. Department staff who manage the grant award must work with the Legal Department to draft each subaward agreement in order to ensure all necessary provisions are included. The Legal Department will maintain a template that will be completed based upon the specific details and requirements of each subaward.

d. Compliance with FFATA: Reporting Subawards of \$25,000 or More

The Federal Funding Accountability and Transparency Act (FFATA), as amended, requires that information on certain federal first-tier subawards be made publicly

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available. This information is published by OMB on a single, searchable website (USASpending.gov) that is open for public access.

When the City is a direct recipient of a federal grant, it is responsible for reporting certain data for first-tier subawards of \$25,000 or more (cumulative over the term of the subaward). The City is required to do this through a reporting tool called the FFATA Subaward Reporting System (FSRS) no later than the end of the month that follows the month the subaward agreement is executed. Information required to be reported in FSRS for federal first-tier subawards includes:

- subawardee information including the entity's name, location, DUNS number, congressional district, and information about the subaward amount and use of funds; and
- subawardee executive compensation data including the names and total compensation of the five most highly compensated officers of a subawardee entity if: 1) the entity in the preceding year received 80% or more of its annual gross revenues in federal awards, and 2) \$25,000,000 or more in annual gross revenues from federal awards, and 3) if the public does not already have access to this compensation information through periodic reports required to be filed under section 13(a) or 15(d) of the Securities Exchange Act or section 6104 of the Internal Revenue Code.

The sub-award information entered in FSRS will then be displayed on www.USASpending.gov associated with the federal prime award received by the City.

The Grant Compliance Officer is responsible for maintaining the central FFATA reporting function for all direct federal grants received by the City. Department staff must notify the Grant Compliance Officer when a subaward of \$25,000 is planned so that proper and timely subaward reporting can be made in the FSRS system.

Common Federal Granting Agency Regulations¹

Department of Commerce: 2 CFR Part 1327

Department of Energy: 2 CFR Part 910

Department of Health and Human Services: 2 CFR Part 300

Department of Homeland Security: 2 CFR Part 3002

Department of Housing and Urban Development: 2 CFR Part 2400

Department of Justice: 2 CFR Part 2800

Department of Labor: 2 CFR Part 2900

Department of Transportation: 2 CFR Part 1201

Environmental Protection Agency: 2 CFR Part 1500

Small Business Administration: 2 CFR Part 2701

¹ These are common agency regulations; this is not an exhaustive list of all federal agencies that have grant regulations.