



Fourth Program Year Action Plan

The CPMP Fourth Annual Action Plan includes the SF 424 and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

Narrative Responses

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Action Plan Executive Summary:

- A. **Summary of Objectives and Outcomes in Plan.** This Action Plan sets forth the activities, of which the City of Rockford proposes to undertake during the program year beginning January 1, 2013 and ending December 31, 2013. It represents the City of Rockford's strategically developed effort to bring together various public and private resources and to direct the utilization of such resources to address identified housing and community development needs.

In 2013, Rockford will continue to focus on seven objectives: Reducing blight, increasing redevelopment activities, increasing the provision of affordable housing, repairing and maintaining streets and sidewalks, enhancing crime awareness, creating, expanding and retaining employment, and reducing chronic homelessness. These objectives were developed to help address HUD's performance measurement objectives of Creating Suitable Living Environments, Providing Decent Affordable Housing, and Creating Economic Opportunities.

Rockford plans to reduce blight through a number of actions, including rehabilitation, demolition of both sub-standard residential and older vacant commercial and industrial property, code enforcement and a limited amount of new construction.

Rockford will continue code enforcement in conjunction with the Police Department's efforts to create a more holistic approach to addressing problem areas. This approach will not only place a major emphasis on code enforcement but, will also use it to augment the city's "fast track" demolition process and acquisition/demolition or redevelopment program to remove vacant/abandoned properties. All of these efforts encompass several of the activities designed to meet one of the identified objectives of creating *decent housing availability/accessibility, affordability and sustainability.*

The City will invest its current federal financial resources while seeking to obtain and leverage additional resources to demonstrate that properly channeled efforts can make a difference and bring about "Excellence Everywhere."

Additional housing related activities are proposed to increase the *provision of decent housing through availability/accessibility, affordability, and sustainability of decent housing* for homeowners, renters and individuals/families who are either homeless or in eminent danger of becoming homeless. These activities include the removal of architectural barriers and environmental conditions, providing down payment and closing cost assistance, supporting pre/post purchase counseling, providing homeless rental assistance, supporting homeless shelter operations, enhancing permanent supportive housing for the homeless, and activities designed to prevent homelessness.

Rockford's Community & Economic Development Department will continue its efforts to partner with other city departments and other public entities to stabilize and in some cases remove the blighted influences that plague many of the City's older business/neighborhood districts.

In January of 2005, the start of the last Consolidated Plan, Rockford's unemployment rate was 7.7% which skyrocketed to 20% in January of 2010. The unemployment rate has improved. As of September, 2012, the unemployment rate was still high but down to 11%. But, as other cities across the nation, Rockford continues to need decent paying jobs. Recent service industry opportunities often do not pay a wage comparable to their manufacturing counterparts. Also, the current workforce often lacks technical and other skills due to lack of training, education, and criminal background to obtain employment. These factors weigh heavy on the City's ability to create economic opportunity exacerbated by the decrease of entitlement Federal funding.

Rockford will continue to maximize its current resources and look at ways to bring in outside resources. This will include the appropriate use of such tools as Tax Increment Financing (TIF), Enterprise Zone (EZ), River Edge Redevelopment Zone (RERZ), New Market Tax Credits, Historic Tax Credits and the Section 108 program. The City will also continue to look at other resources to expand the number of people provided assistance by leveraging the Federal entitlement funds with funds from the State of Illinois and local partnerships.

Incentives will be provided when available and feasible to bridge gaps and bring projects to closure. Proposed activities are designed to achieve the objective of *expanding economic opportunities through sustainability and availability/accessibility*. Such activities include the increasing of job training opportunities, promoting the creation and retention of jobs, rehabilitation and the improving of infrastructure for businesses in lower income neighborhoods.

The City of Rockford will continue to provide assistance to the Rock Valley College SBDC programs to train business owners on writing a business plan to start a business and receive technical assistance.

The following is a brief description to the activities proposed for 2013. These coincide with the budget spreadsheet which can be found at Appendix 8.

1. Administration and Planning

- a. Administration - \$272,024 FY 2013 CDBG, \$20,000 FY 2013 CDBG Program Income, \$76,847 FY 2013 HOME, \$1,500 HOME Program Income and \$12,493 FY 2013 ESG

The City of Rockford will continue to utilize CDBG, HOME, and ESG funds for the planning and implementation of programs and strategies that are assisted in whole or in part. Program administration costs include staff and related costs required for overall program management, coordination, monitoring, reporting and evaluation. Administrative funds are subject to statutory limitations. No more than 20% of CDBG grant funds plus program income may be used for planning and administration. HOME funds are limited to 10% and ESG may not exceed 7.5% for administrative purposes.

- b. Fair Housing - \$1,500 FY 2013 CDBG

Funds available for the provision of fair housing services designed to further the fair housing objectives of the Fair Housing Act by making all persons without regard to race, color, religion, sex, national origin, familial status or handicap, aware of the range of housing opportunities available to them; other fair housing enforcement, education, and outreach activities; and other activities designed to further the housing objective of avoiding undue concentrations of assisted persons in an area containing a high proportion of low- and moderate-income persons. Activities are commonly conducted by the City of Rockford's Fair Housing Board.

The City also anticipates utilizing a portion of its remaining committed Administration funds available through the Neighborhood Stabilization Program in 2013.

2. Rehabilitation Services – \$546,765 FY 2013 CDBG, \$80,000 FY 2013 CDBG Program Income, and \$132,120 FY2012 Carryover Reprogrammed

This project funds operating costs and staff positions that are primarily responsible for outreach efforts for marketing programs, rehabilitation counseling, loan underwriting and processing, preparing work specification, inspections, and other services related to assisting owners, tenants, contractors, and other entities who are participating or seeking to participate in eligible rehabilitation activities.

3. Homeowner - Single Family Housing – Existing and New

- a. Focus Area and Strategy Area Rehabilitation Program: \$107,938 FY 2013 HOME, \$15,000 FY2013 Program Income HOME, and \$32,275 FY 2012 HOME Carryover Reprogrammed

Approximately \$25,000 (not to exceed \$50,000) will be provided as rehabilitation assistance to approximately six (6) owner occupied

homes located within the City of Rockford. Assistance is typically used to ensure the property meets the current local code and to address lead hazards. However, it may also be used for demolition of blight, and to ensure homes are accessible.

b. 203(k) Loan/Grant Foreclosure Program - \$0

A pilot loan/grant program that began in 2012 utilizing the services of a local lender – PNC Mortgage is being discontinued. The program will be re-evaluated during the year to determine if there is a need to fund it with funds from slower moving line items.

The City intends to continue its programs/projects under the Housing and Economic Recovery Act of 2008 and it's Neighborhood Stabilization Program which began March 20, 2009 resulting from program income or de-obligated funds.

4. Acquisition, Relocation, and Disposition - \$0

Due to limited funds, the City is not budgeting for an acquisition program but will continue to dispose of excess property.

Should the City receive additional CDBG funds, this project may be funded.

5. Rental Rehabilitation

Rehab of 533 Fisher - \$250,000 FY 2013 HOME

The City intends to provide additional funds to complete the rehab that originated through the Neighborhood Stabilization Program funds to fill the gap in the contracted amount. This rehabilitation will result in 6 rehabilitated units.

Additional funding towards rental rehabilitation may be provided through the Neighborhood Stabilization Program through the Housing and Economic Recovery Act of 2008 de-obligated and/or program income funds. The City will continue to target these funds to census tracts with the greatest need.

6. Assistance to Community Housing Development Organizations (CHDOs)

CHDO Operating - \$38,423 FY 2013 HOME

The City continues to work with local housing non-profit organizations to further enhance and complement our efforts. Non-profits that meet the eligible criteria may become a Community Housing Development Organization (CHDO) and compete for these operating funds. Funds will be awarded to CHDOs through an application process.

7. Get the Lead Out! (GLO) Program - \$0

A 10% match will be provided to the City of Rockford Human Services Department to match a State of Illinois lead-based paint federal grant if such a grant is submitted and awarded. The program is typically offered citywide and is restricted to low-moderate income households.

8. Homebuyer's Assistance Programs

Many people in Rockford who dream of becoming homeowners face a steep challenge especially in light of the continued foreclosure crisis, credit scrutiny, and economic downturn. The City of Rockford has funded projects to help those families and stabilize the rate of homeownership in Rockford and neighborhoods affected most by the foreclosure crisis while assisting in the de-densification of lower income neighborhoods.

All program participants must complete homebuyer counseling classes and the property must meet local code and the unit cleared through a lead inspection, if applicable, at completion.

a. Homebuyer Assistance Program – \$30,000 FY 2012 HOME Carryover.

Homebuyer assistance may be available for City funded housing activities on a citywide basis for all income eligible residents.

b. Homebuyer Advantage Program - \$150,000 FY 2013 HOME and \$20,000 FY 2012 HOME Carryover Reprogrammed

The Rockford Area Affordable Housing Coalition will administer the Homebuyer Advantage Program, a program available for households of 80% of area median income or less purchasing single family homes within the City of Rockford. The City anticipates providing assistance to thirty-four (34) households.

c. Thatcher Blake - \$30,000 FY 2013 HOME

Homebuyer assistance may be available for households of 80% of area median income or less to purchase a Thatcher Blake River Walk condo unit, originally developed using City funds.

9. RAMP Program \$15,000 2013 CDBG

Funds will be provided to the Regional Access Mobility Program to construct ramps for persons physically challenged. It is anticipated that approximately 5 ramps will be constructed for persons of lower income. This project will be eligible as single family or multi-family rehabilitation.

10. Homebuyer & Rental CHDO Projects

Affordable Housing Projects - \$115,271 FY 2013 HOME and \$203,691 FY 2012 HOME Carry Over Reprogrammed

Funds will be made available to eligible CHDOs on a first come basis to subsidize the gap needed to produce affordable housing homebuyer and

rental projects within their strategy areas. The City anticipates assisting 3 units.

11. Demolition - \$195,336 FY 2013 CDBG

Blighted structures that are not suitable for rehabilitation will be demolished through this program. The City will focus on properties in the CDBG area and deteriorated properties located near schools, on major thoroughfares, and strategically located scattered sites. The City anticipates the demolition of 19 residential and non-residential structures.

Demolitions will also be conducted utilizing funds through the Neighborhood Stabilization¹ program that are de-obligated or considered program income in the geographic areas designated and properties meet the NSP1 definition of blighted.

If additional CDBG funds are received or carry over is more than anticipated, the funds will be used for demolitions as long as we remain within the 30% slum/blight cap.

12. Public Service and Facilities Programs

a. Healthy Neighborhoods Program \$0

If additional CDBG funds exceeding the anticipated level of funds are received, funds may be made available to award to neighborhood groups and/or other non-profits to facilitate projects that address identified needs in specific neighborhoods by making public improvements, improving public facilities, and/or creating new services. Priority will be given to projects serving the City's designated focus area, the CDBG area, and TIF districts. The City will review requests for proposals on a monthly basis. The program concept will remain consistent with that of the previous year.

b. Twenty-First Century After School Program - \$50,000 FY2012 CDBG – Year 5 of 10.

This program supports an after school program at Walker and Nelson Elementary schools.

13. Code Enforcement Program - \$479,645 FY 2013 CDBG

The Code Enforcement Program will include the payment of salaries and overhead costs directly related to the enforcement of state and local code within the CDBG eligible area. This program will be targeted at deteriorated or deteriorating lower income strategy areas. Code enforcement, together with other improvements such as rehabilitation, demolition, and public improvements, is expected to arrest the decline of the area and result in addressing over 3,455 code violations over the next year. This funding will help support code enforcement staff.

14. Microenterprise Assistance

- a. Self-Employment Training Program (RVC/SBDC) - \$30,000 FY 2013 CDBG

The City of Rockford will continue to support the creation of new businesses owned by low/moderate-income residents. The City will use CDBG funds to support the Self-Employment Training (SET) Program, an entrepreneurial training program operated by the Rock Valley College Small Business Development Center. Informational classes will be held with general information about starting a business designed to self-screen candidates for SET classes. An emphasis in Storefront Business Planning will be included. One of the SET classes will be a Spanish version of the SET class. A total of at least three sessions, eight weeks in length, will be offered. It is anticipated that 50 persons will be assisted through the program.

- b. Manufacturing Self-Employment Training Program (RVC/SBDC) - \$25,000 FY 2013 CDBG

This program will assist low-moderate income residents with the creation of a business in the area of manufacturing and provide technical assistance. Participants will receive assistance in the areas of manufacturing, regulations, taxes, business plan advice, lending, writing business plans, marketing, and one-on-one counseling. Three sessions will be provided.

15. Economic Development Services - \$104,075 FY 2013 CDBG and \$13,225 FY 2012 Carryover Reprogrammed

This project funds operating costs and staff positions that are primarily responsible for outreach efforts for marketing programs, rehabilitation counseling, loan/grant underwriting and processing, preparing work specification, inspections, and other services related to assisting business owners and developers. The City will utilize CDBG funds to provide economic development services to entrepreneurs, business- and property-owners, developers, Community Based Development Organizations (CBDOs), and other interested parties in order to facilitate development and provide more goods, services, and jobs to low/moderate income neighborhoods.

16. Standby Section 108 Loan Debt Service - \$85,852 FY 2013 CDBG.

The City will provide stand-by cash infusion to support debt service payments.

17. Rehabilitation & Development Assistance

- a. Rehabilitation & Development Assistance Program - \$68,047 FY 2013 and \$67,880 FY 2012 CDBG Carryover Reprogrammed

The City will continue to provide assistance to Commercial & Industrial businesses or developers making investments within CDBG targeted areas and/or creating or retaining permanent jobs for low- and moderate-income persons, and/or low-income microenterprise business owners. It is anticipated that 2 projects will be assisted.

b. Façade Improvement Assistance Program – \$49,720 FY 2013 CDBG.

This program will provide assistance to businesses to make façade improvements in lower income neighborhood commercial districts. The Program will assist businesses which provide goods and services to the neighborhood and help stabilize CDBG low-to moderate-income neighborhoods. Improvements will be limited to eligible exterior improvements. It is anticipated that 2-3 businesses will be assisted this year.

18. Homeless ESG Activities - \$20,000 FY 2013 ESGP Funds for Essential Services, \$7,400 for Operating, \$56,679 for Homeless Prevention activities, \$70,000 for Outreach and \$12,493 for Program Administration (as previously noted in #1 of this section).

Through the Federal Emergency Solutions Grants Program, local homeless agencies will be assisted. Rehabilitation, essential services, operating, and homeless prevention activities are eligible activities. Funds will be distributed through a competitive process utilizing the Mayors' Community Task Force on the Homeless as the review and approval committee. The City anticipates funding 5 non-profit homeless service providers. The program continues to be administered by the City's Human Services Department.

Approval by Council of the 2013 Proposed Projects/Activities as described above allows the Community & Economic Development Department to administer the CDBG, HOME, and ESG without additional Council approval unless the project/activity is listed below.

Council must approve the following projects/activities:

1. Any projects/activities awarded funds under Section 1 - Administration & Planning, Section 2 - Rehabilitation Services, Section 8 - Homebuyer Assistance (The individual homebuyers assisted will not require council approval. However, any agreements/MOU's for organizations administering and/or assisting with the administration of the homebuyer assistance programs will require City Council approval), Section 13 Code - Enforcement Program, Section 15 - Economic Development Services, and Section 16 - Standby Section 108 Loan Debt Service (specifically the debt service for South Main), requiring an agreement between the City of Rockford and a third party for services equal to or exceeding a value of \$10,000.

Also, any other 3-party agreements, such as Section 9 - RAMP and awards under Section 14 - Microenterprise Assistance, as informational only since the award was already approved via approval of the Annual Plan budget.

2. Projects/activities awarded funds under Section 5 - Rental Rehabilitation.

3. Projects/activities awarded funds under Section 10 - Homebuyer and Rental CHDO Projects.
4. Projects/activities awarded funds under Section 12 - Public Service and Facilities Programs.
5. Projects/activities awarded funds under Section 18 - Homeless ESG Activities.

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.
3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.
4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

Responses:

1. The primary geographic areas of Rockford in which assistance (demolition, rehabilitation, new construction, economic development and code enforcement) will be directed during 2013 will include the Community Development Block Grant area, the HUD Qualified Census tracts, and the NSP census tracts. See maps in Appendix 3 of the appendices section, which also identifies areas of minority concentrations. Strategic areas will be identified within the larger areas to focus our limited resources such as "hot spots" for vacancies as identified by water shut offs. Other areas include those that surround substantial projects such as Jane Addams, the West State Street Corridor, and the South Main Corridor projects. These areas are some of the most severely distressed areas of the city as more than fifty percent of the residents are low income and most have high concentrations of racial minorities. It is estimated at least 70% of our funds will be allocated to projects within the primary geographic areas.

Public services and facilities and homeless activities will be funded on a citywide basis. The location of current and proposed facilities and businesses, acquisition costs, proximity to bus lines, and the current location of feeding programs will help dictate the location of these proposed activities and services.

Economic Development Assistance will be provided in the CDBG targeted low-income areas of the City, in the 30 created Tax Increment Financing Districts, and the Enterprise Zone & River Edge Zone bounded area.

2. There are two reasons for the basis for allocating investments geographically within the above noted boundaries: 1) with dwindling resources, the whole city cannot be served. Since the goal of the entitlement programs is to serve low to moderate income persons, the CDBG area has been selected as a primary focus. There may be concentrated efforts within that area in 2013. 2) The grant we received from the Federal Home Loan Bank of Chicago designated the HUD qualified census tracts and the NSP areas as its geographic boundary. This gives eligible households the opportunity to apply for assistance.

We will continue to market our programs within these areas sometimes focusing mail outs and flyers to concentrated areas. This would include areas on or near main thoroughfares, around schools, and near redevelopment projects to help spur the redevelopment of the entire neighborhood.

3. The greatest obstacle we foresee in 2013 will be the limited resources to address the needs of our community: decent housing, services for those in need, the continued foreclosure problem and its resulting effects on the housing stock, and the need for livable wage jobs. Other obstacles include state and federal guidelines and regulations that limit the population that can be served or the activities that can be undertaken, language barriers, and the continued need for outreach and increased self-sufficiency. One example, approximately 40,000 persons in the service area of our Human Services Department are eligible for the Low Income Home Energy Assistance Program (LIHEAP); funding can only support approximately 6,000 applications.

The actions that will take place in 2013 to address the obstacles to meeting underserved needs include:

- Housing rehabilitation programs will continue. A limited amount of affordable new construction may also be assisted.
- Funding the Rockford Area Affordable Housing Coalition in order to provide pre and post purchase counseling, rehabilitation maintenance training, and foreclosure prevention classes.
- Offering the Homebuyer Advantage Program in 2013 to provide downpayment/closing cost assistance to buyers of vacant property. The program will be administered by a local non-profit.
- Rehabilitation, development assistance, and a self-employment training program available for business expansion or retention and to improve the neighborhood business districts.
- Updating the Continuum of Care ten year strategic plan and using the Point in Time count of the homeless in conjunction with the Housing Inventory Chart to determine gaps in services to the homeless population. These plans are adjusted annually to redirect existing funding or seek new funding in order to address the identified.
- Neighborhood outreach and restructuring services so that we increase self-sufficiency among the service population.
- Addressing language barriers and continuing to ensure that communication efforts with the public are offered in both English and Spanish or include a link to a Spanish speaking resource.

- Continuing to work with neighborhood groups to reach further into the community and holding monthly outreach meetings in various locations throughout the low-income community through the Human Services Department.
 - Training in financial literacy as well as housing counseling and intensive case management through the Human Services Department for those seeking emergency financial assistance. They will also continue to link low-income people to the Workforce Investment Board to improve opportunities for income.
 - Continuing to try and leverage funding with other local and state programs. In addition, planned improvements and structural changes in the Rockford's School District #205 should increase training and education and improve deficiencies in the workforce to provide future "livable wage" jobs.
4. The following resources are expected to be made available and are listed by source type: Federal, State or other resources.

Federal resources expected to be made available include:

1. Community Development Block Grant - The Community Development Block Grant (CDBG), one of the longest-running programs of the U.S. Department of Housing and Urban Development, funds local community development activities such as affordable housing, anti-poverty programs, and infrastructure development. CDBG, like other block grant programs, differ from categorical grants, made for specific purposes. The program provides annual grants on a formula basis to entitled cities and counties to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons.
2. HOME Investment Partnerships Program - The HOME program provides grants directly to the local government in order to implement local housing strategies designed to increase homeownership and affordable housing opportunities for low- and very low-income persons. Please see Appendix 11 for an explanation of how HOME match requirements are satisfied.
3. McKinney Emergency Solutions Grant funds and the Homeless Prevention and Rapid Re-Housing Program, administered by the City of Rockford's Human Services Department, helps nonprofit organizations, including community and faith-based organizations provide emergency overnight and day shelter, offer supportive services for homeless families and individuals, and implement effective homeless prevention and rapid re-housing initiatives within the local continuum of care. See Appendix 12 for an explanation of how Emergency Solutions Grant match requirements are satisfied.
4. Neighborhood Stabilization Program (NSP) program income and deobligated funds. Original grant funds are available for Administration unless used for costs associated with the project located at 533 Fisher Avenue.
5. Housing Choice Voucher Program (Section 8 funds) - This program is designed to help low-income families obtain affordable housing and increased

housing choices. Two (2) public housing authorities, the Winnebago County Housing Authority and the Rockford Housing Authority, administer the program serving the Rockford community.

6. HUD's 203(k) – Although a program was developed in 2012, no action was taken and is not expended to continue in 2012 due to a lack of funding. But, this program continues to be available to the general public through certain lenders. Other lenders offer similar buy and rehab products.

The Section 203(k) program is the Department of Housing and Urban Development primary program for the rehabilitation and repair of single family properties. Lenders have successfully used the Section 203(k) program in partnership with state and local housing agencies and nonprofit organizations to rehabilitate properties and assist borrowers. In certain situations, this program can be combined with HOME funds when conforming to the program guidelines.

The 203(k) program allows borrower to get one mortgage loan, at a long-term fixed (or adjustable) rate, to finance both the acquisition and the rehabilitation of the property. To provide funds for the rehabilitation, the mortgage amount is based on the projected value of the property with the work completed, taking into account the cost of the work. To reduce the risk to the mortgage lender, the mortgage loan is eligible for endorsement by HUD as soon as the mortgage proceeds are disbursed and a rehabilitation escrow account is established. The lender then has a fully-insured mortgage loan.

The program can be used to accomplish rehabilitation of an existing one-to-four unit dwelling in one of three ways:

- To purchase a dwelling and the land on which the dwelling is located and rehabilitate it.
 - To purchase a dwelling on another site, move it onto a new foundation on the mortgaged property and rehabilitate it.
 - To refinance existing liens secured against the property and rehabilitate.
7. The New Markets Tax Credit (NMTC) Program was established in 2000 as part of the Community Renewal Tax Relief Act of 2000. The goal of the program is to spur revitalization efforts of low-income and impoverished communities across the United States and Territories. The NMTC Program provides tax credit incentives to investors for equity investments in certified Community Development Entities, which invest in low-income communities. The credit equals 39% of the investment paid out over seven years.
 8. Section 108 loans provide a source of financing for economic development, housing rehabilitation, public facilities, and large-scale physical development projects. It allows the City of Rockford to transform a small portion of our CDBG funds into federally guaranteed loans large enough to pursue physical and economic revitalization projects that can renew entire neighborhoods. This type of public investment is often needed to inspire private economic

activity, providing the initial resources or simply the confidence that private firms and individuals may need to invest in our distressed areas.

In 2013 the City of Rockford anticipates submitting a Section 108 Loan Guarantee Application in the amount of approximately \$1,500,000 to help retain and grow Rockford Products, LLC. Rockford Products is one of the City's oldest manufacturing companies. The Section 108 Loan Guarantee funds will be invested in the business to insure the retention of Rockford Products, LLC in the City of Rockford, increase productivity, increase sales, and add employment. Should this project fall through, funds will be used for another ED activity.

9. Choice Neighborhoods is a pilot program and an initiative to transform distressed neighborhoods and public and assisted projects into viable and sustainable mixed-income neighborhoods by linking housing improvements with appropriate services, schools, public assets, transportation, and access to jobs. A strong emphasis is placed on local community planning for access to high-quality educational opportunities, including early childhood education. The initiative involves public housing, local governments, non-profits, and for-profit developers in undertaking comprehensive local planning with residents and the community. The Rockford Housing Authority successfully submitted an planning grant application in 2010 with the support of the City of Rockford and intends to apply for an implementation grant. It is expected that the Choice submission will be between 9/2013 and 1/2014. CDBG lots will be utilized as part of the implementation grant once achieved.
10. Youthbuild/Comprehensive Community Solutions, Inc. (CCS) was awarded one of the first grants from the U.S. Dept. of Labor for the YouthBuild Rockford program, following transfer of the program from HUD to DOL in 2006 and has been awarded a total of three DOL YouthBuild grants. The program's original goals are to educate, provide construction training and employ at-risk youth in their communities, while a greater emphasis is being placed on offering postsecondary education and forging stronger links with the One-Stop Career Center system and the nation's community colleges. CCS has been operating the YouthBuild Rockford program since its inception in 1995.

The YouthBuild Rockford Program's goals include: 1) to create affordable housing for homeless and low-income persons and facilities serving various community needs; 2) to create access to well-paying, long-term, meaningful jobs for young adults; 3) to graduate young people who have internalized a commitment to being active community leaders, the ability to take responsibility for their successes and failures and the capacity to set and achieve goals, and 4) to develop meaningful partnerships between adults and youth. (The program has had over 5,300 applicants, has served 950 young people, and placed approximately 75% in jobs or education upon graduation.)

YouthBuild targets at-risk youth that have barriers to employment and to self-sufficiency, in the age range of 16-28. Each youth has the opportunity to participate in a variety of educational components related to their specific needs including Applied Academics, Employability Training, Experiential Vocational Training (Construction or Urban Agriculture), Leadership

Development and Service Learning, Life skills training, a one-year Graduate Program, and an Alumni Club.

Structured classes are conducted to introduce youth to skilled apprenticeships. They learn and practice construction skills, including green building, and earn a nationally-recognized credential through the construction of new homes, or other projects undertaken by CCS, Inc. as a CHDO. The program places graduates in employment, including union apprenticeships, and/or post secondary education.

The YouthBuild Rockford Program has been the recipient of three national awards and is considered one of the most effective programs in the country.

11. Our local Continuum of Care receives approximately \$1.6 million dollars which it uses for various programs including Transitional Housing, Permanent Supportive Housing, and Shelter Plus Care. Our jurisdiction also has a total of 60 HUD-VASH vouchers to house homeless and chronically homeless veterans. In addition, Rockford's Human Services Department receives approximately \$900,000 in Community Services Block Grant funding to address poverty issues.

State Funds expected to be made available include:

1. Illinois Housing Development Authority (IHDA) – This link connects to IHDA's action plan which lists all the funding available
<http://www.ihda.org/government/documents/03AP-ESGHOPWAFED.pdf>
2. Low Income Housing Tax Credits: IHDA is the state's designated housing tax credit agency. Tax credits are incentives for for-profit or non-profit investors to invest in affordable housing for lower income families. The credits may be taken for ten years after the project is placed in service. The annual amount of the credit is a fixed percentage of the qualified costs of the project. Tax Credit projects may leverage other public and private resources such as HOME, CDBG, Tax Increment Financing (TIF) funds, Section 108 and conventional financing in the form of first and second mortgages.
3. IHDA Home Start is a state program, available through local financial institutions, that offers below-market interest rates on conventional loans for new and existing homes. First time homebuyers may also qualify for 3% of the purchase price up to \$6,000 for down payment assistance. Assistance is provided as a 10%, zero interest rate second mortgage. Homebuyer must provide \$1,000 toward the transaction. There are income and purchase price restrictions.
4. IHDA Home Modification grant – It is hopeful that this grant will be made available in 2013. This grant provides assistance to modify homes to improve accessibility.
4. IHDA's Homebuyer Assistance Program in conjunction with the Rockford Area Affordable Housing Coalition (RAAHC) and the Neighborhood Housing Services of Freeport provided \$3,000 - \$5,000 (based on household income) for homebuyer assistance has been available over the last two years. Low to moderate income households could purchase single family dwellings located

throughout Stephenson and Winnebago counties. This program expires in January, 2013. Should the funds become available through IHDA, it is anticipated that a grant would be submitted. In the meantime, the City intends to continue a similar program strictly for purchasers of vacant property in partnership with the Rockford Area Affordable Housing Coalition.

6. IHDA's Rental Housing Support Program will continue to address the need for decent, affordable, and permanent rental housing will be available via a grant received by and administered through the City's Human Services Department.
7. The River Edge Redevelopment Zone promotes the safe and cost effective development of environmentally challenged properties near rivers through the use of tax incentives and grants. The River Edge purpose is to create and retain jobs and to stimulate business and industrial retention and growth.
8. The Enterprise Zone assists in the revitalization of distressed areas by offering financial and tax incentives to stimulate business growth and neighborhood improvement. This Zone will expire in December 2013; but the City of Rockford plans to pursue the application process to extend the Enterprise Zone.
9. Federal Lead Based paint program administered by the Winnebago County Health Department and called Creating Lead Safe Rockford Program and is expected to continue into 2014. Rockford provides a match of staff and HOME grant commitments via its HOME Focus Area Rehabilitation Program.
10. Federal Home Loan Bank of Chicago – Affordable Housing Program (AHP) & Downpayment Plus Program are available. The AHP is a subsidy fund is designed to assist in the development of affordable housing for low and moderate income households. Owner-occupied and rental projects are eligible for funding. Funds can be used to finance homeownership for households at or below 80% of area median income, or to finance the purchase, construction or rehabilitation of rental housing in which at least 20% of the units will be occupied by and affordable for very low income residents. Financial institutions in Illinois that hold stock in the Chicago FHLB may apply for AHP. The local members also have access to Downpayment Plus program which provides down payment and/or closing cost assistance to low income households purchasing in Illinois.

The City was successful in the receipt of \$180,000 through the local member, Harris Bank, of the Federal Home Loan Bank in 2012 which was leveraged with local HOME funds. This program will be completed in 2013.

11. Community Services Block Grant, Department of Energy Weatherization funds, HUD Continuum of Care and ESG funds, funding from the Illinois Housing Development Authority that is applied for and administered by the City's Human Services Department.

Local Funds expected include:

1. American Dream Mortgage available through U S Bank. This program provides fixed rate, repair escrows, and up to \$3,000 Entry Cost Assistance to

be used as closing costs, prepaids or down payment for homebuyers purchasing 1-2 unit dwellings. Income restrictions apply.

2. Habitat for Humanity International is a nonprofit organization that builds and sells homes to low-income families at-cost. Rockford Area Habitat for Humanity built 100 homes since 1988 and plans to build 4 in 2013. After participants show "need", willingness to partner, and an ability to pay mortgage, they are required to volunteer 300 hours of "sweat equity" toward the construction of their home or others. The work varies from general construction, resale retail shop, family selection to assisting at the local office.
3. The Community & Economic Development Department uses local funds to fund the Water Hook-up program, a program available to low-income households for hooking up to City water when wells are non-functioning.
4. Homebuyer Counseling Services – Homebuyer counseling services are provided locally through the Rockford Area Affordable Housing Coalition and Family Credit Management. All of the City of Rockford's Community & Economic Development homebuyer assistance programs require the homebuyer to obtain pre-purchase housing counseling. Counseling helps to ensure families have been trained to undertake and maintain homeownership responsibilities.
5. Tax Increment Financing (TIF) is an important economic development tool used to finance certain types of development costs. TIFs are used by the City to provide public infrastructure improvements, attract private development, spur employment growth and increase the municipal tax base. There are 30 TIF districts scattered throughout the city which include commercial, industrial, residential and mixed use neighborhoods. TIF Financing allows a developer or property owner to receive a portion of the increased real estate taxes generated from a rehabilitation or new construction project.
6. Neighborhood Housing Services (NHS) of Freeport: Established in 1997, NHS is a community-based nonprofit organization, committed to improving neighborhoods and the lives of people throughout Freeport, IL. NHS, through collaborating with the Rockford Area Affordable Housing Coalition, has extended services to the Rockford area.
7. Local match of private funds and volunteer services for the rehabilitation, homebuyer, homeless and commercial projects.

Managing the Process

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.
2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.

3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

Response:

1. The lead agency for administering the programs covered under the Plan will be the City of Rockford's Community and Economic Development Department. This will encompass coordinating and/or managing most housing and publicly-funded economic development and clearance activities. In some instances, this Department will defer its lead role and share coordination with the Rockford Local Development Corporation on publicly/privately-funded economic development activities along with other private financing institutions and the City of Rockford Human Services Dept.

Public Housing activities will continue to be the responsibility of the public housing authorities (Rockford Housing Authority and Winnebago County Housing Authority). Home energy related activities including home weatherization and energy assistance, along with social service activities will continue to be managed and coordinated by the City of Rockford's Human Service Department. This entity will also continue to serve in the lead role in all homeless activities in 2013. The Winnebago County Health Department generally takes the lead regarding lead mitigation/control or lead abatement activities but works cooperatively with the City of Rockford's Community Development and Human Services Departments. The Rockford Area Affordable Housing Coalition will take the lead in providing down payment and closing cost assistance along with local lenders.

The City will also continue to provide technical assistance directly to or seek technical assistance from HUD to provide assistance to external agencies such as Northwestern Illinois Agency on Aging, Regional Access Mobilization Project, Family Credit Management, Neighborhood Housing Services of Freeport, Community Housing Development Organizations and the Rockford Area Affordable Housing Coalition. Cooperative efforts among agencies are critical in the provision of affordable housing.

2. The process by which the City of Rockford utilizes to develop the Action Plan update begins near the beginning of the year right after the previous years CAPER is completed and submitted. The process continues throughout the year with periodic assessments of current program performance including participation and expenditure rates. It is culminated at the time of the public hearing with the presenting of the draft plan. The entire process represents a collaborated effort of the City of Rockford and other partner organizations such as the Mayor's Task Force on the Homeless [represented by more than fifty (50) social service agencies] and numerous public and private housing and economic development entities. Private, public, and non-profit organizations were reached through several means, including informal telephone conversations, e-mail correspondence, and meetings regarding specific issues. The Community and Economic Development Department provides staff support for many City boards, commissions, and task forces that contribute data for the Plan preparation. The consultation process also included discussion and coordination with both the Rockford and Winnebago Housing Authorities and the City of Rockford Human Services Department. They also provide statistical data and narratives related to their housing stock and plans they have for on-going enhancements to their affordable housing stock and how their efforts impact the overall anti-poverty strategy of the City.

The following represents the timeline and schedule for preparation of the plan:

Annual Action Plan Citizen Participation Schedule

<u>Date</u>	<u>Activity</u>
April 30	Perform quarterly program assessment
June 12	Hold initial meeting with administration to discuss ideas
June 12 – 28	Evaluate current programs
June 29	Hold ND/ED budget planning sessions(s)
July 2 – August 3	Develop draft of Annual Action Plan
August 7 or 8	Meet with Administration to present draft plan budget
August 14	Hold first public input sessions (AM & PM)
August 15 – September 12	Complete narrative portions of plan to correspond with proposed budget
September 10-12	Meet with Aldermen to share proposed plan
September 12 & 13	Hold second public input sessions

September 17	Read plan into City Council with pending date for committee review of 10/22 & publish plan for 30 day comment period
September 18	30 day comment period begins
September 18 – October 19	Additional discussions with Aldermen as needed
October 19	30 day comment period ends
October 22	Plan is discussed at Planning & Development committee meeting
October 29	City Council reviews committee recommendation
November 5	Receive City Council approval
November 13	Submit to HUD
December 15	Publish request for release of funds

3. The City of Rockford will continue to maintain its ongoing efforts to coordinate with other public housing providers as well as partnering with private housing providers when applicable. Such coordination efforts are also extended to both health and social service agencies. All such agencies have been and will continue to be encouraged to communicate on a regular basis to discuss program design and implementation.

Several city departments will continue to coordinate efforts to promote the best possible delivery of services. The participating departments are Finance, Human Services and the Community and Economic Development. Each has a specific role in administering homeless programs, emergency payment of rent and utilities, weatherization, lead hazard reduction, home water hook up, and all other home rehabilitation programs.

The city will continue to staff various boards, committees, coalitions, commissions and task forces for partnering service providers. The level of staff support will vary depending upon the level and nature of city involvement with the partnering entity.

Citizen Participation

1. Provide a summary of the citizen participation process.
2. Provide a summary of citizen comments or views on the plan.

3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

Response:

1. In compliance section 24 CFR 91.105 of the Department of Housing and Urban Development federal regulations, the City of Rockford adopted and adheres to a City Participation Plan which can be found at Appendix 4. The plan sets forth the City's policies and procedures for citizen participation and does so in manner that ensures compliance with the federal regulations.

The City of Rockford is fully cognizant of the importance of citizen participation as it relates the development of an Annual Action Plan. The citizen participation process creates a vessel to obtain meaningful input from the community and organizations serving the community to formulate programs that will best meet the needs of low and moderate income people throughout the community. The year's process included holding two sets of public input sessions designed to inform citizens as well as to provide an opportunity for input that was be used to help the City determine activities for the 2013 Action Plan. Their input, along with the assistance of the Citizen Participation Committee, helped to ensure that Rockford's Federal funds were allocated as appropriately as possible. Throughout the process, the Community and Economic Development staff provided technical assistance to applicants and the Citizen Participation Committee members. A set of public input sessions was held west of the river and a second set was held east of the river, with each having a day time option as well as the evening option. Each session was promoted throughout low-income communities and at non-English speaking services centers and at centers that assist the disabled community. All locations were all fully accessible facilities and included ample available free parking along with being either located on or adjacent to public bus lines. In addition, a city staff person trained in providing sign language was present at each public input session. The entire Annual Action Plan Citizen Participation Schedule is outlined in the previous section of this document – Managing the Process.

2. There was one written comment received during the 30-day comment period. The comments are contained in Appendix 6 of this document. In addition, comments and views offered during public hearings were captured in the minutes of each and public hearing and can be found in Appendix 5.
3. As was mentioned previously, outreach efforts to obtain participation from non-English speaking persons and those from the disability community included working with service centers that serve those populations. More specifically, La Voz Latina, the local Hispanic service center is included on regular communication to promote participation from their clientele. La Voz translate each correspondence into Spanish and acts as an interpreter for those who may need it upon request. In additional, the local center for independent living, RAMP receives outreach material as well and serves as the primary entity to communicative with and promote involvement from the disability community.

4. There were no comments made that were not accepted.

Institutional Structure

1. Describe actions that will take place during the next year to develop institutional structure.

Response:

The 2013 Annual Action Plan principal responsibility remains with the Department of Community and Economic Development with the Department of Human Services managing all homeless programs. The coordination among all public and private organizations involved in community development activities will be initiated and maintained by the department. Current partnerships will be nurtured and new ones will be sought to address the needs of this community. Such efforts are designed to identify and secure resources necessary to carry out the various aspects of this plan. More specifically, the following actions will be continued:

- The city will continue to carry out the final aspects of its Neighborhood Stabilization Program activities which will expire March 20, 2013.
- The city will continue to attempt to strengthen and build the capacity of non-profit housing developers by facilitating their access to technical assistance.
- The city will continue to work with and make resources accessible to neighborhood and community based groups and organizations.
- The city will continue to encourage coordination among local lenders and realtors to create additional affordable housing and economic development opportunities.
- The Department of Community and Economic Development Rockford will work with Metropolitan Agency for Planning (RMAP) and its Sustainable Communities Regional Planning Grant program of HUD in their development of a Regional Analysis of Impediments as the fair housing assessment document for the region. The identification of impediments and findings, recommendations, and actions will be incorporated into the 2013 as a substantial amendment, if needed, the 2014 Annual Plan and the current Consolidated Plan, a substantial amendment, if needed, as well as the 2015-2019 Consolidated Plan.
- The City will continue to utilize other available state & federal public resources to enhance and/or encourage economic development in targeted areas.
- Partnerships with EDEEN neighborhood residential/commercial organizations will be structured for uniformity and continued.

Monitoring

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

Response:

a. Recipient Monitoring

The City of Rockford has and continues to recognize the importance of ongoing monitoring in regards to the overall effectiveness of CDBG, HOME, and ESG programming. As a result, the City of Rockford Community and Economic Development Department continues to carry out a previously developed internal management plan designed to assure the proper and timely implementation of the annual plan activities. It also includes processes to assure proper compliance with all program requirements for the CDBG, HOME, and ESG entitlements.

b. Rehabilitation Projects

The responsibility for monitoring rehabilitation projects begins with the assigned Finance/Construction specialists. Upon completion, the responsibility shifts to the Compliance unit to ensure that all the requirements of the agreement have been met. The City of Rockford will also ensure compliance with housing codes, consistent with the requirements of the Consolidated Plan programs. All properties assisted will be inspected prior to assistance by a trained Rehabilitation Construction Specialist for code compliance and will require that any identified violations be addressed as a condition of funding. In many cases, the rehab project will assist in addressing the violations. The specialist will continue to monitor projects throughout the construction phase. Also:

- Each homeowner or investor-owner project file in which funds may be committed will contain a check sheet to determine if it meets the definition of Section 215 goals (affordable housing) upon initial occupancy. For projects that actually result in assistance, records will be kept regarding the units' affordability, data on income, age, race/ethnicity, family size and gender data on each household benefiting from the program in the file and at a centralized location for reporting purposes. Each file will also contain costs, methods of procurements, work items completed and volunteer hours, if utilized.
- Accountability of recipients and their contractors will be insured through quality standards and performance/production guidelines as outlined in the agreements/contracts executed with each recipient of federal funds. In addition, all funds awarded will be held in an escrow account and disbursed only after proper invoicing to the City is presented and an inspection is made at the project site by City staff. The City shall also inspect each unit to determine if it meets local housing code, housing quality standards established by HUD, or the building code prior to final payout and yearly throughout the term of the agreement or contract. The agreements/contracts will specify City and HUD requirements including affirmative marketing and fair housing requirements, Section 504 handicapped accessibility requirements, rules regarding lead based paint, housing quality standards through the attachment of itemized work item lists/ bids/proposals, procurement requirements, maintenance of insurance, Davis-Bacon, and other rules as they may apply. Also, through

the execution of promissory notes and mortgages, other restrictions will be outlined such as, but not limited to, recapture restrictions, determinations of appropriate equity interest and third party rights, and those that will ensure continued affordability through long term mortgages with assumption clauses, as applicable. Title will be conveyed to those participating in the City's programs with specific terms and conditions.

- Investor-owners that have received federal funds for the rehabilitation of rental units will also be required to submit annual responses to questionnaires regarding rents, tenant characteristics, and affirmative marketing procedures in order to determine compliance with program policies and procedures as stipulated in executed agreements, contracts, notes and mortgages.
- Occupancy and maintenance requirements will be instituted on several programs. Monitoring methods include: 1) requiring property owners to maintain property insurance in full force and effect with the City listed as loss payee. This ensures the City being notified if ownership changes and protects City investments, and 2) scheduling on-site and regular drive-by inspections.
- All projects assisted with CDBG and HOME funds will be monitored subsequent to completion consistent with the regulations of the program.

The Department also monitors the amount of available funding per activity by utilizing the IDIS and the City's financial management accounting system to assure that uncommitted and expended funding does not exceed allowable HUD-recommended levels yet meets the 1.5 percent expenditure HUD requirement.

The City's overall monitoring practices are designed to achieve the following goals:

- Improve program performance
- Improve financial performance
- Assure regulatory compliance

Economic Development projects assisted with CDBG will be monitored in consistence with HUD required regulations of the program during and if applicable after project completion.

c. Sub-Recipient Monitoring

The City provides oversight of all designated sub-recipients of CDBG, HOME, or ESG funds and conducts a Risk Assessment to determine the appropriate level of monitoring that is needed for each. Typical monitoring will include monthly desk audits of records and reports, yearly on-site visits, and a comprehensive review if there are warning signs of problems.

Monthly "desk audits" of the programs allows staff the opportunity to track the accuracy and timeliness of expenditures. On-site monitoring enables staff members an occasion to ensure sub-recipients are in compliance with Federal

regulations and are actively working to achieve the objectives outlined in their grant agreement and the Annual Action Plan. Site visits also allow sub-recipients to receive technical assistance and provide feedback about program administration.

The Risk Assessments will also take into account the following risk factors:

- Sub-recipients new to either the CDBG, HOME and ESG program,
- Sub-recipients that have experienced turnover in key staff positions or a change in goals or direction,
- Sub-recipients with previous compliance or performance problems such as untimely reports and pay requests or repeatedly inaccuracy,
- Sub-recipients carrying out high-risk activities; and
- Sub-recipients undertaking multiple-funded activities for the first time.

To help ensure success in meeting its goals, the City will:

- Select sub-recipients that share the vision of the Consolidated plan,
- Prescreen to determine capacity, eligibility and feasibility,
- Execute clear, complete and enforceable agreements,
- Provide ongoing training and technical assistance to improve performance; and,
- Ensure that there is an effective reporting and data gathering system will be in place.

d. Davis Bacon Compliance

The City of Rockford employs a staff member in the City's Legal Department to oversee any projects that require Davis Bacon compliance. This position attends all bid openings and is responsible for conducting site visits, conducting employee interviews, and checking the weekly payroll forms for accuracy and compliance.

e. Section 3 Compliance

Rockford's Legal Department is responsible for Section 3 compliance. This includes overseeing projects that require section 3 compliance and preparing the yearly reports to document compliance.

f. Minority and Women Business Outreach Program

1. Minority and Women Business Outreach Efforts

Consistent with Executive Orders 11625, 12432, and 12138, the City of Rockford will continue its efforts to encourage the use of minority and women's business enterprises.

2. Outreach Standards

The City's outreach standards at a minimum will include:

- a. The promotion and encouragement of minority and woman-owned businesses and their participation in the City's procurement process as both general contractors, subcontractors, and suppliers of goods and services.
- b. Issuing a yearly statement in the Rockford Register Star (and/or a minority publication with a substantial circulation) of its public policy and commitment to minority and women business development.
- c. Networking with local, state, federal, and private agencies and organizations to enhance the contractual opportunities for minority and women business development.

3. Guidelines for a Minority/Women Business Outreach Program

In order to ensure the inclusion to the greatest extent feasible, of minorities and women and entities owned by minorities and women, the City of Rockford's guidelines for Minority and Women Business outreach programs will include:

- a. Publishing, in conjunction with the Northern Illinois Minority Companies Association, a Minority and Female Business Directory if feasible.
- b. Supporting a minority and women business development and support group (NIMCA-Northern Illinois Minority Companies Association & RAMBA – Rockford Area Mexican Business Association).
- c. Conducting specialized workshops for minority and women regarding contacting and subcontracting opportunities through City and other agencies.
- d. Promoting and marketing minority and woman business through:
 - News stories
 - Television talk shows
 - Public service announcements
 - Special video tapings
 - Flyers to other interested businesses and organizations
 - Specialized advertising in magazines and newsletters
- e. Preparing an annual year-end report on the dollar amounts awarded to minority and women businesses.
- f. Continuing an established and extensive network with local, state, and federal agencies and businesses to more readily notify and assist the minority and women business community when contract or subcontract opportunities arise.

- g. The sponsoring or co-sponsoring of:
- Minority and Women Business Support Group meetings
 - Northern Illinois Minority Companies Association (NIMCA)
 - Chicago Regional Purchasing Council
 - Downstate Illinois Minority Enterprise Systems (DIMES)
 - Hispanic Chamber of Commerce of Northern Illinois (HCCNI)
 - Northern Illinois Black Chamber of Commerce (NIBCC)
 - Rockford Black Business Owners Association (RBBOA)
 - Rockford Ministers Fellowship
 - National Association for the Advancement of Colored People (NAACP)
 - Rockford Area Minority Coalition Organizations (RAMCO) made up of several organizations for networking & the dissemination of information.
 - Rockford Area Mexican Business Association
 - Business related education workshops
 - State, federal and private conferences, works shops and seminars
- h. Maintaining centralized records on the use and participation of minority and women businesses as contractors and sub- contractors in all HUD-assisted program-contracting activities through the Neighborhood Development Division and the Purchasing Department.
- i. Maintaining a Procurement Policy that encourages the use of Minority and Women Owned Business in the City's procurement efforts:
- As part of bid requirements the City of Rockford requires Minority and Women Owned Business to certify their business as such. Also, Bid documents, require contractors to register as a Minority Business Enterprise (MBE) or Women Business Enterprise (WBE), as a means of certification. Certifications from the Illinois Department of Transportation, Illinois Central Management Services and the City of Chicago can be reciprocated for this requirement.
 - Require contractors/firms to provide a listing of subcontractors.
 - Track MBE/WBE participation of all contracts awarded through bid process.
 - Revamped measures to encourage minority and women-owned business participation.
 - Set goals for minority participation

4. Other Projects/Actions

- a. Economic development activities will have individual project files in which the eligibility, environmental review, financial underwriting, public benefit analysis, and approval documentation will be found. Each file will also contain project cost documentation and Davis-Bacon documentation
- b. The Community and Economic Development Department is responsible for meeting identified goals and will complete year-end accomplishment reports. The reports will be reviewed at regularly scheduled quarterly staff meetings. Accomplishments will be evaluated to determine

whether the programs are being carried out in accordance with its goals, objectives and performance measurements in the Action Plan and in a timely manner. Productivity and program impact will be evaluated on a yearly basis.

- c. As required, a Consolidated Annual Performance and Evaluation Report (CAPER) will be completed and submitted to HUD annually by March 31st (90 days after end of program year) to document the progress made implementing Rockford's community development strategy.
- d. The Mayors' Community Task Force on Homeless will meet monthly to review the homeless providers' progress in serving the homeless, discuss problems, and identify gaps in services. They will also identify priorities for the following year and grant opportunities.
- e. The Rockford Housing Authority will continue to submit to the City of Rockford copies of reports and plans that they are required to submit to HUD for those programs it undertakes that are a necessary part of this Consolidated Plan.
- f. More clearly defined roles and improved cooperation has enabled federal grant fund draw downs to occur in a timely manner thus decreasing the need to use local funds to carry out grant activities. As a result, the department is less likely to not reimburse the local dollars and thus more likely to expend grant dollars in a timely manner.
- g. Community and Economic Development staff works with the Finance Department to review grant disbursements. This review enables a more realistic projection of which, if any, funds will probably need to be reprogrammed. A thorough evaluation of projects and activities is performed yearly, prior to annual budget preparation. At this time, slow moving projects are evaluated to determine if funds should be reprogrammed to other line items. After appropriate reprogramming of activities then the budget is prepared.
- h. The Community and Economic Development Department also meets monthly with the Finance and Human Services Department to review and discuss current financials and address any issues.
- i. As of October 1, 2006, in place are HUD's requirements to institute performance measurements. Thus, the five-year goals and objectives that the city commonly develops for each Consolidated Planning period includes objectives and outcomes. Progress towards meeting the goals established in each year's annual plan is tracked and assessed. All of this provides a solid framework for completing each year's Consolidated Annual Performance and Evaluation Report.
- j. IDIS reports are reviewed regularly to evaluate program status.

Lead-based Paint

- Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

Response:

The city of Rockford conducts actions to evaluate and reduce lead-based paint hazards in homes through several different entities. Those actions through the Community Development Department include:

- Providing training and lead certifications/renewals to insure that staff is trained to identify lead and supervise workers on projects serving lower income persons. Three people within Community Development are certified; One Person is certified as a lead supervisor and the second two are certified as a lead supervisor, inspector and risk assessor.
- Incorporating lead-safe work practice, interim controls, and when required, lead abatement to all of its housing rehabilitation programs.
- Incorporating language addressing the Federal lead requirements in our rehabilitation legal documents.
- Providing additional educational materials in Spanish.
- Offering training to increase the number of lead-based paint contractors, workers and supervisors.
- Following the Lead-Based Paint Disclosure Rule when rehabbing property. Owners and occupants involved in rehabilitation projects are provided a disclosure of known information on lead-based paint and lead-based paint hazards before the sale or lease of most housing built before 1978 to protect families from exposure to lead from paint, dust, and soil.
- The Rockford Area Affordable Housing Coalition continues to address lead in its pre-purchase counseling course.

The Human Services Department of the City will continue to educate home owners about the presence of lead paint and the potential hazards during our weatherization assessment. They will make referrals to the Winnebago County Health Department while ensuring that our weatherization contractors are certified with the EPA/RRP and hold them to a higher level of responsibility and quality workmanship when they are performing lead-safe work practices on their client's property. They will also provide technical assistance to all Continuum of Care sponsors conducting rehabilitation on their properties. Human Services also intends to apply for additional grants for Lead paint abatement when they become available.

The Winnebago County Health Department (WCHD) serves as a delegate agency for the State Health Department to conduct lead risk assessments on properties identified as being occupied by a lead poisoned child. The most common source of exposure is from hazards associated with lead-based paint, which was banned for residential use in 1978. In Winnebago County, 67.4% of housing units—nearly 85,000 homes—were built prior to 1979, and potentially contain lead-based paint hazards. Within the city of Rockford, this number jumps to 77.8%, or more than 44,000 homes.

The WCHD's licensed lead inspector conducts approximately six to ten inspections per month and insures that property owners comply with the Illinois State Lead Poisoning Prevention Act and Lead Poisoning Prevention Code. If necessary, the inspector will turn property owners over to the State's Attorney's office for further enforcement.

The WCHD is currently underway with its second Creating Lead Safe Rockford (CLSR) program, funded through the Department of Housing and Urban Development's Lead Hazard Reduction Demonstration grant. Since this iteration of the CLSR program began in November 2011, nearly 100 applications have been accepted and more than 40 homes have received lead mitigation work. Over the 3 year life of the grant, the WCHD expects to complete lead mitigation work at a total of 200 homes or more.

The Winnebago County Health Department (WCHD) has formed several partnerships to make the process smoother for the clients that they serve. A partnership was formed with Crusader Community Health, which is a non-profit health care provider that serves low-income and Medicaid patients. This partnership aims to teach first-time expectant mothers and their partners about lead poisoning prevention. WCHD has also formed partnerships with organizations such as Head Start (through the City of Rockford) and the Rockford Area Affordable Housing Coalition.

Through the course of the first CLSR grant period (2007-2010), Winnebago County increased its lead screenings by 51.4% over the 2006 level and reduced incidence rate of lead poisoning by 20.2%.

Year	2006	2007	2008	2009	2010
Number of children screened	4,279	5,124	4,169	6,101	6,478
Number of children lead poisoned (>10 µg/dL)	129	135	109	112	103

Sources: Illinois Lead Program Annual Surveillance Reports 2007, 2009, and 2010

The WCHD hopes to maintain this trend as they continue working through their current CLSR program.