



Fifth Program Year Action Plan

The CPMP Fifth 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.

Program Year 5 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, 2014 and ending December 31, 2014. 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 2014, Rockford will again 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'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.

Rockford plans to reduce blight through a number of actions including housing rehabilitation, demolition of both substandard residential and older vacant commercial and industrial property, code enforcement, with also a limited amount of infill new construction.

Rockford will continue its code enforcement program 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 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*.

Additional housing related activities are proposed to increase the *provision of decent housing through availability/accessibility, affordability, and sustainability of decent housing*. Housing assistance for homeowners, renters, and individuals/families who are either homeless or in eminent danger of becoming homeless will be provided. Activities include the removal of architectural barriers and environmental conditions, providing homebuyer purchase 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.

In January of 2010, in the second year of the last Consolidated Plan, Rockford's unemployment rate skyrocketed to 20%. The unemployment rate has improved. As of August, 2013, the unemployment rate was still higher than both the state and national averages but down to 10.8%. However, like many other older industrial cities in the Midwest and throughout the nation, Rockford continues to need jobs that pay a livable wage. As growth in the service industry continues to occur, rarely do these opportunities offer a wage comparable to their manufacturing counterparts. In addition, the current workforce continues to lack technical and other skills to obtain employment. These factors weigh heavy on the City's ability to create economic opportunity intensified by the decrease of entitlement Federal funding.

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." This will include the aggressive, but 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, the Section 108 Loan 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 funds and partnerships.

Incentives will be provided when available and feasible to bridge gaps and bring projects to fruition. 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.

Also, 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.

2014 Proposed Projects/Activities

1. **Administration and Planning**

- a. Administration - \$285,364 FY 2014 New CDBG, \$20,000 FY 2013 CDBG Program Income, \$86,732 FY 2014 New HOME, \$1,000 HOME Program Income (Housing), \$12,516 FY 2014 New ESG (Homeless), and \$77,951 (Economic Development) FY2014 New CDBG

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 2014 CDBG

Funds will be made 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.

- c. 2015-2019 Consolidated Plan/Annual Action Plan - \$41,400 FY 2014

Funds will be used to hire a consultant to prepare a 5-year Consolidated Plan and 1-year Annual Action plan required by the U. S. Department of Housing and Urban Development in order to receive annual block grants for community development and affordable housing including CDBG, HOME and ESG funds. It also serves a role in certifying that other grants are consistent with the Plan by identifying needs, potential resources and strategies to meet the identified priority needs.

2. **Rehabilitation Services** - \$544,521 FY 2014 New CDBG, \$45,000 FY 2014 CDBG Program Income, and \$20,000 FY2013 Carryover Reprogrammed

This project provides 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 Projects - Existing and New**

- a. Focus Area and Strategy Area Rehabilitation activity: \$252,130 2014

New HOME, \$10,000 FY2014 Program Income HOME, and \$570,670 FY 2013 HOME Carryover Reprogrammed

Up to \$40,000 is proposed as rehabilitation assistance to approximately twenty-one (21) owner occupied homes located within the City of Rockford. Assistance is typically used to remove blight by ensuring that the assisted property meets the current local code, addresses potential health issues by removing lead hazards and ensure homes are accessible for those with physical disabilities.

b. **Haskell Area Infrastructure Improvements and Homeowner Rehab Activity - \$115,000 FY 2014 New HOME**

This project will assist with reconnection costs needed to replace deteriorated sanitary sewer systems. Total infrastructure costs are \$879,000 with HOME paying a percentage of the costs; City Public Works funds and the Rock River Water Reclamation District funds will support the remainder. Homes can also be assisted will be brought up to City of Rockford code through the Focus Area Rehabilitation program. It is estimated that 16 properties will be assisted.

Program income from the Neighborhood Stabilization program under the Housing and Economic Recovery Act of 2008 which began March 20, 2009 will be utilized in 2014 for an eligible activity.

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

Due to limited funds, the City is not budgeting for an acquisition program but will continue incur costs in order to dispose of excess CDBG and NSP property. Funds will be funded and drawn on an as needed basis.

5. **Rental Rehabilitation - \$0**

Should CDBG or HOME funds become available, the City may provide rental rehabilitation funds to one or more projects. CDBG requires that 51% of the units in a property be of lower income; HOME requires that the HOME assisted units be comparable to other units in the project and that they be designated initially for households at 60% of the area median income.

6. **Operating Assistance to Community Housing Development Organizations (CHDOs)**

CHDO Operating - \$43,366 FY 2014 HOME and \$40,996 FY 2013 Carryover

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. It is anticipated that one CHDO will be assisted.

7. 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 the economic downturn which has put many property owners "underwater". The City of Rockford is proposing 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. ND Homebuyer Assistance Program - \$0

Homebuyer assistance may be available for households of 80% of area median income or less to purchase property constructed or rehabilitated for the purpose of owner occupancy such as Thatcher Blake River Walk condominiums and properties constructed or rehabilitated by housing non-profits.

b. Homebuyer Advantage Program - \$0

NWHomeStart continues to be interested in administering the Homebuyer Advantage Program – a grant once funded through an Illinois Housing Development Authority. This program was a down payment assistance program available for households of 80% of area median income or less purchasing single family homes.

c. 203(k) Rehabilitation. City staff has been working on a pilot program in partnership with Bank of America's 203(k) Program. The City would provide a \$5,000 as leverage on each acquisition and rehabilitation activity within the City of Rockford assisting households of 80% of the area median income.

d. IHDA Homebuyer Rehabilitation Assistance - \$240,000 FY 2014 New Home

Homebuyer and rehabilitation assistance will be available for City funded housing activities on a citywide basis for households at or below 80% of the area median income. Properties acquired must be vacant at the time of the initial inspection. The Illinois Housing Development Trust Fund program (\$500,000 over two years plus \$20,000 for project deliver and administrative costs) will be leveraged with HOME funds. It is anticipated that 12 households will be assisted in 2014.

e. 224 Foster \$4,500 2013 HOME Carryover Reprogrammed

Funds needed to sell a property rehabilitated through the HOME program.

8. **RAMP Program** - \$15,000 2014 New CDBG

Funds will be provided to the Regional Access Mobility Program to construct ramps for persons physically challenged. It is anticipated that approximately 6 ramps will be constructed for persons of lower income. This project will be eligible as single family or multi-family rehabilitation.

9. **Homebuyer & Rental CHDO Projects**

Affordable Housing Projects - \$130,099 FY 2014 New HOME and \$361,495 FY 2013 HOME Carry Over Reprogrammed

Funds will be made available to eligible CHDOs by applying for gap funding assistance to produce affordable homebuyer and rental units within their strategy areas and/or areas that are not concentrated with poverty. The City anticipates assisting 4 units.

10. **Demolition and Activity Delivery** - \$214,267 FY 2014 New CDBG and \$73,786 2013 CDBG Carry Over Reprogrammed

Blighted structures that are not suitable for rehabilitation will be demolished through this program as well as the costs to deliver the project. The City will focus on properties in the CDBG area and deteriorated properties located near schools, on major thoroughfares, and strategically located such as those in transformation housing plans. Selection will be through a ranking process. The City anticipates the demolition of 22 residential and non-residential structures.

11. **Public Service and Facilities Programs**

a. Healthy Neighborhoods Program \$0

If additional CDBG funds are received over and above the anticipated allocation, funds may be awarded 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.

b. Twenty-First Century After School Program - \$50,000 FY2014 CDBG

This funding continues to support an after school program at Walker and Nelson Elementary schools.

12. **Code Enforcement Program** - \$570,260 FY 2014 CDBG

The Code Enforcement Program includes the payment of salaries and overhead costs directly related to the enforcement of state and local code within the CDBG eligible area. 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 support neighborhood

standards inspectors as well as a portion of the supervisor, a Senior Building Inspector and clerical support.

13. Microenterprise Assistance

Self-Employment Training Program (RVC/SBDC) - \$20,000 FY 2014 New CDBG and \$5,000 in 2013 CDBG Carry Over Reprogrammed.

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, both the regular session and a Manufacturing (SET) Program. This entrepreneurial training program is operated by the Rock Valley College Small Business Development Center. A total of at least two sessions, eight weeks in length, will be offered. It is anticipated that a minimum of 24 persons will be assisted through the program.

The Manufacturing (SET) program may also continue to 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.

14. Economic Development Services – Administration and Activity Delivery - \$126,024 FY 2014 CDBG (Activity Delivery \$48,073 and Administration as part of the 20% cap \$77,951)

The City will utilize CDBG funds to provide economic development administration and the delivery of 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 people and neighborhoods.

15. Standby Section 108 Loan Debt Service - \$83,437 FY 2014 CDBG.

The City will provide stand-by cash infusion to support debt service payments for a South Main Street grocery store. See question 4. *General Questions Response* for additional information regarding Rockford's Section 108 proposed use and budget considerations for 2014.

16. Rehabilitation & Development Assistance

- a. Rehabilitation & Development Assistance Program - \$80,000 FY 2014 CDBG

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 low-income microenterprise business owners. It is anticipated that 2 projects will be assisted.

- b. Façade Improvement Assistance Program – \$60,000 FY 2014 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.

17. **Homeless Emergency Solutions Grant Program Activities** - \$20,000 FY 2014 ESGP Funds for Essential Services/Outreach, \$67,609 for Operating, \$66,750 for Homeless Prevention and Rapid Rehousing activities, and \$12,516 for Program Administration (as previously noted in #1).

Through the Federal Emergency Solutions Grants Program, local homeless agencies will be assisted. Rehabilitation, essential services, operating, homeless prevention and rapid rehousing activities are eligible. Funds will be distributed through a competitive process administered by the Rockford, Winnebago, Boone Counties Continuum of Care serving as the review and approval committee. The City anticipates funding 5-6 non-profit homeless service providers.

Homeless permanent housing relocation activities will be designated to areas of opportunity defined as housing located near employment and educational opportunities.

Special Considerations:

Approval by City Council of the 2014 Annual Plan allows the Community & Economic Development Department to commit to all programs/activities without additional Council approval, with the exception of the following:

- 1) Projects, programs, and activities proposed which are outside an original program design and exceed more than \$20,000; or
- 2) CHDO/Developer projects requiring gap assistance for an activity in an amount more than \$20,000.

Any increases or decreases in CDBG and/or HOME funds will be applied to projects in need or slow moving, respectively.

Substantial changes will invoke the citizen participation process and City Council approval. Substantial changes are those projects/activities not falling within this Annual Action Plan or changes totaling more than 20% of the total federal budget including program income and carryover. Monetary movement within a project type (e.g. Homebuyer Assistance Programs, Homeowner – Single Family) will be acceptable and will not be made part of the 20% calculation.

7.5% of the CDBG allocation will be designated through existing programs in support of the economic development activities along the West State Street corridor and Choice Neighborhoods Implementation Grant transformation area should the grant be awarded.

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.

Program Year 5 Action Plan General Questions response:

As in previous years, the principle geographic areas of Rockford in which assistance (demolition, rehabilitation, new construction, economic development and code enforcement) will be directed during 2014 to projects within the Community Development Block Grant area, the HUD Qualified Census tracts, and the NSP census tracts. Please 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 the West State Street Corridor, the Choice Neighborhood area (pending implementation grant) and the South Main Corridor projects. These areas remain 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. Due to the high concentration of poverty within the city, Rockford will identify ways to desegregate and de-concentrate public and assisted housing in low-income 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 following geographic areas of the jurisdiction: the Community Development Block Grant area, Tax Increment Financing Districts, Enterprise Zone and River Edge Zone District area, North Main Corridor, West State Street Corridor, and South Main Corridor area. Programs and areas will be marketed through program flyers, Economic Development Education & Entrepreneurship Network (EDEEN), International Council of Shopping Centers (ICSC) conferences, Rockford Area Economic Development Council (RAEDC) and Rockford Local Development Corporation (RLDC).

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.

Program Year 5 Action Plan General Questions response:

The basis for allocating the resources associated with this annual plan within the described geographic areas is not only to satisfy the statutory and regulatory requirements of the programs but to provide benefits primarily to low and moderate income people. The intent is to do so with the greatest degree of flexibility possible while augmenting and supplementing current assistance efforts that utilize other resources to maximize the overall impact.

The city will continue to market 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 hopefully spur the redevelopment of the entire neighborhood.

3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

Program Year 5 Action Plan General Questions response:

The greatest obstacle in 2014 will continue to be the limited resources available to address the needs of the Rockford community. As Rockford's poverty population increases so too does the needs of these disadvantaged people. However, federal, state and other grant dollars remain relatively flat with little or no increases to keep pace with the growing needs.

The actions that will continue in 2014 to address obstacles to meeting underserved needs include:

- Offering rehabilitation and development assistance, self-employment training, and façade improvements for business expansion, startups or retention to improve neighborhood business districts and other targeted areas.
 - The leveraging federal funds with other local and state programs and partners.
 - Providing a housing rehabilitation program that will fund a local center for independent living to construct accessible ramps.
 - Working with neighborhood groups to educate and empower them to seek and identify resources to address the needs of their residents.
 - Addressing language barriers by 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.
 - Training in financial literacy as well as housing counseling and intensive case management through the Human Services Department and NWHomeStart for those seeking assistance.
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.

Program Year 5 Action Plan General Questions response:

The federal resources expected to be made available to address the needs identified in the plan include:

- The U.S. Department of Housing and Urban Development's Community Development Block Grant (CDBG) program provides funding for local community development activities such as economic development, affordable housing, anti-poverty programs, and infrastructure development. The program provides annual grants on a formula basis to entitled cities and counties to develop viable urban communities.

- HOME Investment Partnerships 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.
- 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.
- Section 108 guaranteed loan program will allow the City of Rockford to transform a small portion of our CDBG funds into federally guaranteed loans in the form of a loan pool large enough to pursue physical and economic revitalization projects. This program will be used to spur private development activity from individuals to invest in our distressed areas and/or create/retain jobs for lower income. The City of Rockford anticipates submitting and receipt of a Section 108 Loan Guarantee for an estimated \$1.5 to \$2 million to help close the financial gap on several projects which will provide a significant benefit to the City of Rockford as well as the larger region. The projects will generate hundreds of direct and indirect employment opportunities as well as a considerable property tax increment. There are several projects proposed. All must follow the guidelines of the CDBG program.
- The New Market Tax Credit (NMTC) program will help the Rockford community by providing tax credit incentives to investors for equity investments in certified Community Development Entities, which invest in low-income communities.
- Rockford has received \$54,774.74 in 2013 program income through the Neighborhood Stabilization Program (NSP)1. The funds will be used for one or more eligible NSP1 projects and program administration.

The State resources expected to be made available to address the needs identified in the plan include:

- The River Edge Zone and Enterprise Zone funding opportunities will continue in 2014 to offer tax incentives that will assist developers in the revitalization of distressed areas. The Enterprise Zone expiration date has been extended until 2016 by IL State Law, and the City of Rockford will submit an application before the zone expires for the creation of a New Enterprise Zone that will adhere to the new rules and regulations.

- Federal Home Loan Bank of Chicago – Affordable Housing Program (AHP) & Downpayment Plus Program may be available. The AHP is a subsidy fund 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 bank, BMO Harris, and the Federal Home Loan Bank in 2012. These funds were leveraged with local HOME funds. This program will be completed in 2014.

- 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.
- The Enterprise Zone assists in the revitalization of distressed areas by offering financial and tax incentives to stimulate business growth and neighborhood improvement was extended in 2013.
- Comprehensive Community Solutions received a lead removal grant that may be leveraged with the HOME program.
- A portion of the National Foreclosure Settlement Awards through the Office of Attorney General Lisa Madigan's office will be leveraged with HOME.
- State funds through the Illinois Housing Development Authority will be leveraged with Rockford's CDBG demolition and HOME homeownership program.

The local resources expected to be made available to address the needs identified in the plan include:

- Tax Increment Financing (TIF) – The City of Rockford currently has 31 TIF areas. These areas allow a developer or property owner to receive a portion of the increased real estate taxes generated from a development project. TIF is an important economic development tool that is used to provide public infrastructure improvements, attract private development, spur employment growth and increase the tax base.

- 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 3-4 in 2014. 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.
- The Community & Economic Development Department uses local funds for the Water Hook-up program, a program available to low-income households for hooking up to City water when wells are non-functioning.
- Local match of private funds and volunteer services for the rehabilitation, demolition, 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.

Program Year 5 Action Plan Managing the Process response:

The lead entity for administering the programs covered under the Plan will be the City of Rockford's Community and Economic Development Department. This will include 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/or 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. The Economic Development, Education & Entrepreneurship Network (EDEEN) is also responsible for managing grants and initiating neighborhood activities.

Public Housing activities will continue to be the responsibility of both 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 2014. 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, Human Services Department, and Comprehensive Community Solutions when applicable. HomeStart (formally the Rockford Area Affordable Housing Coalition) will take the lead in counseling potential homebuyers and approving down payment and closing cost assistance in conjunction with local lenders. They will also take the lead in the provision of court mediation services.

The City will continue to provide technical assistance directly to or seek technical assistance from HUD to provide assistance to external agencies. Other partnering agencies may include Northwestern Illinois Agency on Aging, Regional Access Mobilization Project, Family Credit Management, Community Housing Development Organizations and NWHomeStart. Cooperative efforts among agencies are critical in the provision of affordable housing and delivering services to lower income persons.

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.

Program Year 5 Action Plan Managing the Process response:

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 year's CAPER is completed and submitted. This 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 Rockford/Boone/ Winnebago County Continuum of Care (CoC) 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 are 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 boards, commissions, and task forces that contribute data for the Plan preparation. The consultation process includes 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 10 - 13	Hold initial meeting with administration to discuss ideas
June 17 - 26	Evaluate current programs
June 28 or 29	Hold ND/ED budget planning sessions(s)

July 1 – August 2	Develop draft of Annual Action Plan
August 6 or 7	Meet with Administration to present draft plan budget
August 15	Hold first public input sessions (AM & PM)
August 16 – September 12	Complete narrative portions of plan to correspond with proposed budget
September 19 -12	Meet with Aldermen to share proposed plan
September 12	Hold second public input sessions (AM & PM)
September 16	Read plan into City Council with pending date for committee review of 10/22 & publish plan for 30 day comment period
September 17	30 day comment period begins
September 17 – October 18	Additional discussions with Aldermen as needed
October 18	30 day comment period ends
October 21	Plan is discussed at Planning & Development committee meeting
October 28	City Council reviews committee recommendation
November 4	Receive City Council approval
November 13	Submit to HUD
December 15	Publish request for release of funds
April 15	Resubmission per CPD Notice 13-010

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

Program Year 5 Action Plan Managing the Process response:

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. 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, Legal, Public Works and the Community and Economic Development departments. 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 each partnering entity.

The 2015 – 2019 Consolidated Plan process will seek input from agencies and residents across the city and region by offering public input sessions, a survey through Survey Monkey, and one-on-one sessions. The City is in the process of updating its 2020 Comprehensive Plan. Both documents will be consistent in their deliver of the needs of the community and actions needed moving forward.

Citizen Participation

1. Provide a summary of the citizen participation process.

Program Year 5 Action Plan Citizen Participation response:

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 mechanism 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 used to help the City determine activities for the 2014 Action Plan. This input 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 other partner organizations. 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. Provide a summary of citizen comments or views on the plan.

Program Year 5 Action Plan Citizen Participation response:

There were no written comments received during the 30-day comment period. If comments were received they would be 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. City Council members did raise a concern regarding the need for additional demolition funds due to the deplorable condition of Rockford's housing stock.

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.

Program Year 5 Action Plan Citizen Participation response:

As mentioned, 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 translates each correspondence into Spanish and acts as an interpreter for those who may need it upon request. The local center for independent living, Rockford Access Mobilization Project (RAMP), receives outreach material as well and serves as the primary entity to communicative with and promotes involvement from the disability community.

4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

Program Year 5 Action Plan Citizen Participation response:

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.

Program Year 5 Action Plan Institutional Structure response:

The overall development of the 2014 Annual Action Plan and most of the responsibility of implementing the activities within it remain with the Department of

Community and Economic Development with the exception of the homeless programs which are managed by the Department of Human Services. The coordination among all partner organizations involved in community development activities will be initiated, monitored and maintained by the department. Current partnerships with both public and private entities will continue to be nurtured and new ones will be sought to address the emerging 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 as program income is generated.
- 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 to Fair Housing Study and Fair Housing Equity Assessment document for the region. The identification of impediments and findings, recommendations, and actions will be incorporated into the 2014 Annual Plan and the current Consolidated Plan, a substantial amendment, if needed, as well as the 2015-2019 Consolidated Plan.
- Partnerships with EDEEN neighborhood residential/commercial organizations will be continued to be explored and expanded when applicable.
- The City will continue to equip non-profit housing developer with tools to build their capacity primarily through access to technical assistance.
- The City will continue to seek out and utilize other public resources from both state and federal levels to foster economic development in targeted areas.
- A review and edit of the 2020 plan will be completed for a more comprehensive plan across community partners and internal City of Rockford departments. There will be consistency between the 2020 Plan and the 2015-2019 Consolidated Plan.

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.

Program Year 5 Action Plan Monitoring response:

a. Recipient Monitoring

The City of Rockford continues to recognize how ongoing monitoring affects the overall effectiveness of CDBG, HOME, and ESG programming. Consequently, the City of Rockford Community and Economic Development Department continues a internal management plan designed to assure the proper and timely implementation of the annual plan activities. This includes

functional processes to allow adjustments necessary to ensure compliance with all program requirements for the CDBG, HOME, and ESG programs.

b. Rehabilitation Projects

The responsibility for monitoring rehabilitation projects begins with the assigned Finance Specialist and is shared with the Construction Specialist throughout the rehabilitation phase. 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 are 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. It should be noted that in many cases, the rehab project will assist in addressing the violations. The specialist will continue to monitor projects throughout the construction phase. In addition:

- 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 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 cross-cutting regulations that may apply. Also, through the execution of promissory notes and mortgages, other restrictions will be outlined such as, but not limited to, resale or recapture requirements, 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 reports that provide

responses 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 and consistent 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.

Risk assessments will also take into account the following 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 an effective reporting and data gathering system is or will be in place.

The responsibility for monitoring economic development projects begins with the ED Administrator. In house reviews are conducted to review the application for CDBG funding, the written agreement, progress reports (if applicable), and draw-down requests. In addition, annual Davis Bacon documents for reporting purposes and Section 3 reporting documents are completed and/or reviewed and submitted to the Legal Department Compliance officer.

All properties must meet zoning and building code regulations which will be determined when permits are obtained and applicable drawings are submitted to the appropriate City departments. Any issues will be addressed prior to assisting the project.

For projects assisted, records will be kept regarding the data on income, race/ethnicity, and family size data on each household benefiting from the program or the census tract information for the service area will be documented in the file for reporting purposes.

An ED staff member(s) will monitor loan/grant recipients to assess their progress in creating jobs for low to moderate income persons. When applicable, default and foreclosure of a loan/grant will be initiated by the Economic Development or Legal staff in instances in which the recipient fails to take sufficient action to satisfy the CDBG requirements or make loan payments as required.

The agreements/contracts will specify City, HUD, and other rules as they may apply. Also, through the execution of any applicable promissory notes and mortgages other restrictions will be outlined.

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 Section 3 projects and preparing the yearly reports to document compliance. The Community and Economic Development Department collects the data from the developers and contractors.

f. Minority and Women Business Outreach Program

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 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 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 which:
- 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.
 - Requires contractors/firms to provide a listing of subcontractors.
 - Tracks MBE/WBE participation of all contracts awarded through the bid process.
 - Revamped measures to encourage minority and women-owned business participation.
 - Sets 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 can 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 Rockford/Boone/Winnebago County Continuum of Care will meet a minimum of quarterly 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 drawdowns 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.

Program Year 5 Action Plan Lead-based Paint 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. Two people within Community Development 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 work to ensure that all permanent supportive housing units funded through McKinney Vento, as well as all rental units funded through the Illinois Department of Human Services will receive a visual lead inspection. Those with suspected lead will be referred to the Winnebago County Health Department.

City of Rockford Weatherization has worked with contractors and staff to ensure that they comply with lead safe work practices. Weatherization has provided the appropriate training for the following: EPA/RRP worker and firm certification, Lead Safe Worker Classes, and onsite inspections to ensure the safety of clients and

contractors. COR WX Program researches the background of all housing built before 1978 with Illinois Historic Preservation agency.

The Winnebago County Health Department (WCHD) serves as a delegate agency for the Illinois Department of Public Health to conduct lead-based paint inspections and 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, approximately 68% of housing units—more than 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%, or more than 52,000 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 also manages the Creating Lead Safe Rockford (CLSR) program, a grant program funded through the Department of Housing and Urban Development’s Lead Hazard Reduction Demonstration grant. WCHD has been awarded funds through this grant three times between 2007 and 2013. Since 2007, the CLSR program has provided lead-based paint inspections and conducted lead mitigation work for more than 200 homes in the Rockford area. Over the next 3 years, the WCHD expects to complete lead mitigation work at least 300 more homes throughout Winnebago and Boone counties.

The WCHD has formed several partnerships to make the process smoother for the clients that they serve. The WCHD works with Crusader Community Health, 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 the Rockford Housing Authority, La Voz Latina, and the Boone County Health Department to further spread the availability of the CLSR program to more areas and populations.

Since the CLSR program began in 2007, Winnebago County increased its lead screenings by nearly 50% over the 2006 level and reduced incidence of lead poisoning by approximately 20%.

Year	2006	2007	2008	2009	2010	2011	2012	2013
Number of children screened	4,279	5,124	4,169	6,101	6,478	6,251	6,748	Not available
Number of children lead poisoned (>10 µg/dL)	129	135	109	112	103	103	103	Not available

Sources: Illinois Lead Program Annual Surveillance Reports 2007, 2009, 2010, 2011, and 2012.

The WCHD hopes to maintain this trend as they continue working as the State’s Delegate Agency for childhood lead poisoning prevention as well as through the current CLSR program.