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Other Actions

Barriers to Affordable Housing

The City of Rockford Community & Economic Development Department continued its rehabilitation assistance and homebuyer assistance programs as planned and plans to continue these programs through 2015 with minimal changes. The geographic boundary for the focus area rehabilitation programs will expand to include the entire Community Development Block Grant area. For the new pilot program known as the IHDA Homebuyer Rehabilitation Program, city staff encountered many obstacles when creating this complex program; it combines several funding sources with a mix of rules and procedures. City staff worked with IHDA staff, City Legal Department, local lenders, and realtors to resolve these issues. As a result, the City has engaged in an aggressive marketing plan to move the program forward.

The Rock River Homeless Coalition members have made additional efforts to engage community landlords. Many landlords will not accept programs such as Section 8, Rapid Rehousing, or Shelter Plus Care, which is a major barrier to finding affordable housing. Benefits of the programs were explained to community landlords, as well as explaining the Housing First model.

Other barriers that will be addressed moving forward are those experienced by people with eviction histories and criminal histories. Those individuals with serious mental illnesses or addictions are another area with barriers. The Rockford area does not have any type of “wet house” where they can be placed to begin working on a housing goal and it often seems as though they do not want permanent housing. The Rock River Housing Coalition is discussing options for these individuals, but there is not a quick answer to this problem.

One barrier that caused applicants to be denied rehab assistance was the cost of rehabilitation. This resulted in a change made in 2014; an increase in funds per project was instituted. Other reasons for denial (ownership status, failure to bring in needed documentation and households being over income but in need of assistance) continue to be issues. Staff has worked to streamline and bring additional clarity to the application and process where possible. A loan pool operated by a local not-for-profit is being considered that would help additional families obtain assistance.

Obstacles to Meeting Underserved Needs

There have been several actions taken by RHA and WCHA to address potential residents with special needs requiring supportive housing. RHA is expanding relationships with CSH - Community Supportive Housing and AID – Association for Individual Development to uncover additional housing platforms where supportive services are part of the housing model. RHA and WCHA serve with several agencies as advocates for affordable housing and programs that promote self-sufficiency. Both agency directors and leadership staff serve on several human services boards to aid in the advancement and integration of

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services. WCHA and RHA continue to explore opportunities to apply for the HOPE VI Main Street program. RHA launched NewMix, an award winning artisan entrepreneurship program, via partnership with the Rockford Area Arts Council, the City of Rockford, Rockford Public Schools, and Etsy.

Reduced funds continue to be an obstacle. Other sources of funding both for match and leverage were continually evaluated for compatibility to the CDBG and HOME programs. The City of Rockford continued to offer rehabilitation and development assistance, self-employment training, and façade improvements for business expansion, startups and retention to improve neighborhood business districts and other targeted areas. State funds through Illinois Housing Development Authority were used to leverage HOME funds on homebuyer assistance/rehabilitation programs. CDBG funds were leveraged with IHDA Abandoned Property Program funds and the City's Sanitation Funds to demolish vacant homes in 2014. Staff members continued to refer individuals to Human Services and NWHomeStart to receive financial literacy training, housing counseling, and intensive case management. Referrals are made to other programs (Lead and Weatherization) in order to stretch our funds.

Lead-Based Paint Hazards

The City of Rockford through its Community Development Department continues to incorporate lead-safe work practices, interim controls, and lead abatement when assisting households through our CDBG and HOME-assisted housing rehabilitation programs. This includes:

- Two staff persons with state certifications as Lead Risk Assessor's, which helps to reduce the expenses relating to risk assessments and clearance testing.
- Since January of 2014, we conducted Fifty-One (51) property inspections for our rehabilitation programs. Twelve (12) total rehab projects with Lead abatement/mitigation activities were completed.

Rockford Housing Authority (RHA) conducted (under agreement with a third-party professional environmental firm) a public housing portfolio-wide inspection of all pre-1978 property to identify all areas of lead and asbestos concern. RHA has implemented a plan to clear lead from its properties over the next several years. Until lead is entirely removed (supported by clearance testing), RHA staff has been trained and performed routine inspections on all identified areas of lead and asbestos presence to ensure no hazards exist. Should a hazard be identified, properly certified vendors are contracted to contain or abate the hazard. RHA keeps an open and active contract with an environmental firm to address these situations.

RHA partnered with the County of Winnebago in a Healthy Homes competitive grant and was awarded \$3 million to clear non-public housing rental homes of lead. RHA, under contractual agreement, has maintained a program compliance inspector on staff to assist in Section 8 HQS inspections as a means to ensure HCV clients are not exposed to lead hazards in HCV supported properties.

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The City of Rockford Human Services Department no longer does lead-free work directly. However, all of the housing units funded through HESG Prevention or Rapid Rehousing funds do receive a visual inspection for lead hazards.

The Winnebago County Health Department's Lead Program works to prevent and respond to cases of childhood lead poisoning in our community. In 2014, the WCHD operated two Lead Hazard Reduction Demonstration (LHRD) grants funded by HUD. Together, these programs completed training for 42 individuals in RRP lead-safe work practices, conducted 113 lead-based paint inspections/risk assessments, and performed lead hazard mitigation in 82 homes. The WCHD is also a delegate agency for the State's Childhood Lead Poisoning Prevention program and conducts case management for children with elevated blood lead levels. At any given time, the WCHD manages approximately 100 open cases. Together, these programs provided lead poisoning prevention education to a total of 722 people, and conducted an additional 161 home visiting, recheck, and final clearance inspections.

Anti-Poverty Strategy

The Rockford Housing Authority continues with its ROSS and Family Self Sufficiency (FSS) programs. Both programs have been historically successful in reducing poverty. WCHA received a Housing Choice Voucher FSS grant, a Public Housing FSS grant, and a Resident Services grant to help residents achieve self-sufficiency.

RHA celebrated another very successful year with its redesigned Re-Build program: a local solution to improving self-sufficiency and employment for RHA clients.

RHA and the Winnebago County Housing Authority (WCHA) made many strides in supporting their residents' personal growth and desires for success by providing educational scholarships for families. These programs provide the opportunity for residents to get closer to reaching their goals and for RHA and WCHA to let the residents know that they believe in them as well.

The 2014 Community Action Plan through the City of Rockford's Human Services Department, prescribes how poverty in the Rockford area will be combated throughout the year. The plan utilizes all grants including CSBG, IDHS, FEMA, and EFSP. The plan utilized case management, financial literacy training, and energy conservation classes to increase families' self-sufficiency and thereby lift them out of poverty.

The Human Services Department also used programs such as SWEEP to reduce the amount of blight in neighborhoods by providing employment and training to teens from economically challenged families. This project included pre-training (life/work skills), training classes, and paid work experience for program participants. During calendar year 2014, 7 low income persons participated in and received stipends for the program. More than 25 homes in the service area were assisted.

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Five low-income clients were provided scholarships through the City of Rockford's Human Services Department to attend educational or occupational training at an accredited Illinois Institution, with consideration given to fields of study in the high technology areas or other growth occupations.

Institutional Structure

One of the goals of the Rockford Housing Authority's strategic and PHA plan is a commitment to *"Improve efficiency and effectiveness of our work force with targeted training programs and hiring practices."* RHA conducted semi-annual 360 degrees surveys along with employee reviews to ensure all staff are meeting the needs of the agency. As part of the process, staff created personal growth plans that align with the results of the surveys and training needs as identified by co-workers and supervisors. In 2015, RHA has committed \$200,000 to staff training and onboarding expense to grow institutional capacity.

In 2014, the Community and Economic Development Department continued to coordinate community development activities often as the lead agency with many partner organizations. Some of the activities included:

- Quarterly reporting of Neighborhood Stabilization Program (NSP) activities. In 2015, CED staff received technical assistance to review NSP activities and initiated cleanup to prepare for the closeout of the grant.
- Coordination and education with local lenders and realtors to create affordable housing and economic development opportunities.
- Collaborated and partnered with Rockford Community Partners (formerly known as EDEEN) to improve neighborhoods.
- Educated non-profit housing developers on HUD rules and regulations and the path to becoming CHDOs.
- Worked with City Planning Department, other City staff, and consultants to ensure consistency planning and goals between the 2015-2019 Consolidated Plan, 2020 Plan, the Vital Signs report, and the Analysis of Impediments to Fair Housing.

In terms of economic development, the City of Rockford continued to partner with area economic development agencies, Rock Valley College Small Business Development Center, Rockford Community Partners (formerly known as EDEEN), and various business district organizations. City staff served on boards and committees of several non-profits and provided guidance and information related to programs, best practices, and funding availability. We also obtained and disseminated information that might be beneficial to other staff members and the community at large.

The City continued to work closely with the Rockford Community Partners group to monitor their budgets, work plan, and accomplishments. The governance of the group is provided by Community Development Director, CEO of Rockford Area Convention and Visitors Bureau, President of Rockford Area Economic Development Council and CEO Rockford housing Authority, and group Director.

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In 2014, the City of Rockford created a comprehensive planning coordination for long-term planning that will bring the entire community together to assist with the community's goals and future shaping of plans. This planning will be used when reviewing development proposals, designing infrastructure expansions, and planning new facilities. The Consolidated Plan for 2015-2019 will be consistent with this Comprehensive Plan.

The Rockford City Council will alter the council and committee meetings in 2015. Committee meetings will now also have telecast or video recording of those committee meetings and this change in the process will no longer negatively impact citizen participation. The current structured system doesn't work well for council members, staff, or citizens. In fact, while we hold more full council meetings than any other large city in the state, the disjointed and opaque committee meeting process hurts our ability to build effective alignment between council members, staff and citizens. Under this new approach, individual committee chairs would be recognized in order of readiness, and each committee would proceed with its respective meeting until all of the work of each committee is completed for the evening. By convening each committee at the same time, every council member would likely be in attendance and ready to participate. The City of Rockford staff members can now incorporate regular operating reports by their departments to our council and community members.

Enhance Coordination

The Rockford Housing Authority (RHA) applied for the 2013 Choice Neighborhoods Initiative (CNI) with the Winnebago County Housing Authority (WCHA) as a co-applicant. RHA attempted to partner with the City of Rockford and others to submit a 2014 application; however, when the application was taken through City Council, it did not receive a passing vote. Activities listed in both applications continue to be implemented with willing partners and via other funding mechanisms. In February 2015, RHA and WCHA, elected and appointed officials, neighborhood and non-profit organizations and other community members met with leaders from HUD to discuss affordable housing programs and best practices.

The City of Rockford continued to coordinate efforts in 2014 with other public and private housing agencies and service agencies. Staff members participated in local housing groups, Rock River Homeless Coalition meetings, non-profit boards, and other meetings within the community. In 2014, Neighborhood Development staff held monthly meetings with interested developers in the community to discuss Community Housing Development Organizations. These meetings provided consistent communications with non-profit organizations and others in the community who are interested in affordable housing projects.

The City of Rockford as well as the Public Housing agencies are connected to and coordinate with *Transform Rockford* and the Rock River Valley United Way. Rockford is receiving technical advice and

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expertise from federal inter-agency teams as part of the SC2 program. These teams are partnering with the mayor and city leadership to support the community's vision for economic development.

City of Rockford Economic Development staff are currently partnering with several different agencies on initiatives and projects: Rockford Area Economic Development Council (RAEDC), Rockford Local Development Corporation (RLDC), Rockford Chamber of Commerce, Business District Associations, Rockford Region Economic Development District (EDD), Rock River Development Partnership, Winnebago County, and the Rockford Park District. Also, the approval of our community to participate in the Strong Cities, Strong Communities Initiative will help strengthen our local capacity and address community and economic development priorities. It will also assist with the coordination of community partners to external partners on issues and concerns effecting the Rockford area.

There were no actions proposed in the 2014 Annual Action Plan relating to Economic Development that were not taken during the program year. Economic Development staff plans to keep moving forward with current collaborative and all inclusive plans to expand and retain employment at existing businesses, recruit new businesses, retrain existing Rockford labor, and expand economic opportunities. The key to achieving the City's goals is to leverage the minimal CDBG funding with other community funding, incentives, and private lending. In addition, technical assistance was provided in Rockford's use of Section 108 funds. It is the plan to use Section 108 funds starting in 2015 for larger economic development projects will help to spur new development and retain business in the Rockford.

In the past year, the homeless service providers in the community have truly collaborated with each other to bring about change in the community. They have continued to share more information through meetings, partnerships, and utilization of the HMIS system. The public housing agencies have become more engaged with the RRHC as well. The participating agencies have worked to establish several coordinated policies as well as coordinated case management services to ensure clients are getting the best services possible. Many providers have begun or are about to begin to change internal policies to coordinate with the goals of the collective. Media coverage, including social media, has also helped to get information out to the providers and the community.

In 2014, the Rock River Homeless Coalition was selected as one of 71 applicants to be a part of the Zero: 2016 program. This goal of this national campaign is to end chronic and veteran homelessness by 2016. The RRHC is also participating in the Mayor's Challenge to End Homelessness, an initiative to end veteran homelessness by the end of 2015. In the next year, the Coalition plans to take steps to engage further with the Veteran's Administration and the local Veteran's Assistance Center.

Analysis of Impediments to Fair Housing Choice

In 2014, Rockford Metropolitan Agency for Planning (RMAP), the City of Rockford, and Rockford Housing Authority completed a Regional Analysis of Impediments and Fair Housing Equity Assessment (RAI) and Housing De-Concentration Plan. The plans identified the need for de-concentration of areas of

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racial/ethnic minorities, poverty, and public and assisted housing as a high priority. The U. S. Department of HUD has defined “Areas of Concentration and Segregation (R/ECAP) – as areas or census tracts within a jurisdiction comprised of 50% or greater minority population and 3 times or more the poverty level of the MSA (35.1% for Rockford MSA) and generally lacking the basic amenities and failing to provide a quality of life expected and desired for any area within the MSA. The goal of de-concentration would be to achieve minority concentrations and poverty level less than defined above by R/ECAP and to transform these areas of concentration into “Opportunity Areas”. Opportunity Areas would be areas offering access to quality goods and services, exemplary schools, health care, range of housing, transportation to employment and service centers, adequate public infrastructure, utilities, and recreation.

Based on the analysis, a disproportionate concentration of public and assisted housing product and voucher utilization exist in minority concentrated and low income zip codes and census tracts within the Rockford City limit boundaries.

As part of our 2015-2019 Consolidated Plan process, we have identified Planning for R-ECAP De-Concentration Areas as one of our priority needs. The following are a list of other public policy initiatives that will be considered during the 5 years of the 2015 - 2019 Consolidated Plan. These policies are needed to reduce barriers to affordable housing.

1. The City of Rockford will encourage enactment of a Regional Governance Policy (RGP) that requires local governments in the Rockford MSA and Region to adopt and implement the 2013 Regional AI and Social Equity recommendations and their participation in implementation of remedial actions;
2. RGP would affirm each jurisdiction's support for the housing and poverty de-concentration plan and creation of a regional affordable housing share plan by all jurisdictions in the region.
3. The City of Rockford will encourage enactment of a Regional Tax Credit Location Criteria and Local Support Policy to be adopted by each government in the region to guide demonstrations of local support to the State of Illinois for Low Income Housing Tax Credit Applications for projects in the region.
4. The City will lobby the State of Illinois for criteria changes in their developer selection and tax credit award process emphasizing development standards, amenities in developments and location in non-minority / non poverty concentrated areas is included in the State LIHTC evaluation policy and scoring system. Regional Low Income Housing Tax Credit (LIHTC) Project Support Criteria should be developed to guide the regions and individual jurisdictions evaluation and provision for a letter of support and or funding for Low Income Tax Credit Application to the State of Illinois. The criteria should include limitations or restrictions on supporting applications for developments in current R-ECAP census tracts, concentrations of LIHTC developments in any individual area or jurisdiction, design criteria that increase amenities to residents, limitations on income concentrations in individual developments similar to those imposed by HUD QHWRA regulations, and CEPTED design standards. These standards should be formally adopted by

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individual jurisdictions in the region and used to model a state legislative agenda that move toward similar criteria adopted by the State to guide approval of LIHTC applications.

5. The City of Rockford will encourage enactment of public policy creating local and regional resources for housing and neighborhood preservation (i.e., dedicated sales tax, bond programs for infrastructure, housing trust funds, land bank, and inclusionary housing incentives).

A summary of impediments are included in the RAI. Rockford Housing Authority and Winnebago County Housing Authority are using the summary and the recommendations in the RAI and FHEA to advance fair housing equity for their residents and in the neighborhoods where each agency has property and/or provides subsidies. Both agencies have incorporated these components into their PHA plans and daily operations. Both agencies are advocates for and of the strategies, as well as for their clients. In addition, RHA and WCHA enforce routinely updated policies and procedures to promote fair housing. Fair housing trainings are continuously offered and performed for staff, private, and Section 8 based landlords. RHA and WCHA have worked closely with Prairie State Legal Services to proactively address local fair housing education and concerns.