



# HOME-ARP ALLOCATION PLAN

## FY2021 ANNUAL ACTION PLAN SUBSTANTIAL AMENDMENT

CITY OF ROCKFORD, IL  
COMMUNITY HOUSING & ECONOMIC DEVELOPMENT DEPARTMENT

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## Introduction

On September 2021, the U.S. Department of Housing and Urban Development (HUD) allocated \$3,579,012 to the City of Rockford, Illinois, under a new grant program called HOME Investment Partnerships - American Rescue Plan (HOME-ARP).

HOME-ARP grant funds are designed to reduce homelessness and increase housing stability across the city for individuals or households experiencing homelessness, or at risk of homelessness, or members of other vulnerable populations. The program allows the City to provide homelessness assistance and supportive services to address housing instability. HOME-ARP guidance states that these funds must be used to primarily benefit the qualifying populations through the four eligible activities: (1) Tenant Based Rental Assistance (TBRA), (2) development and support of affordable housing, (3) provision of supportive services; and (4) acquisition and development of non-congregate shelter (NCS) units.

Per HUD Notice CPD-21-10, HOME-ARP funds must be used to primarily benefit individuals or families from the following qualifying populations who are:

- Homeless, as defined in 24 CFR 91.5, under categories (1), (2), or (3)
- At risk of homelessness, as defined in 24 CFR 91.5
- Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by HUD in CPD 21-10.
- Other Populations who:
  - Requiring services or housing assistance to prevent homelessness
  - At the greatest risk of housing instability
- Veterans and families that include a Veteran family member that meets the criteria for one of the qualifying populations above.

To receive funding, the City must develop and submit a HOME-ARP Allocation Plan to HUD, which describes the distribution of HOME-ARP funds and identifies any preferences for eligible activities. The development of the HOME-ARP Allocation Plan must also be informed through stakeholder consultation and community engagement. As required by HUD, the City's submission of this HOME-ARP Allocation Plan (Plan) to HUD will be an amendment to its Fiscal Year 2021 Annual Action Plan.

## Consultation

### *Describe the consultation process, including methods used and dates of consultation:*

The City of Rockford consulted with the local CoC, veteran's groups, public housing agencies, fair housing groups, disability advocates, and other stakeholders whose clientele includes members of the HOME-ARP qualifying populations to identify unmet needs and gaps in housing or service delivery systems. The identified stakeholders have first-hand knowledge of the needs of the qualifying populations and where the gaps in the service-delivery system lie.

On January 11, 2023, the City of Rockford solicited consultations with stakeholders and commenced consultations on November 17, 2022, through February 3, 2023. During the development of this plan, the City interviewed vital stakeholders in one-on-one meetings and small focus groups to determine current services provided in the community and potential collaborations for providing services under HOME-ARP. Stakeholders were asked to describe the services they provide for the qualifying population and to describe the size and demographic composition of their clients. They were also asked to describe the need and gaps in services and identify any current resources addressing them. Lastly, the stakeholders were asked to identify priority needs and preferences and provide input on using HOME-ARP funds to address current housing and service delivery needs effectively.

Stakeholders verbally described the needs and gaps in services during the interview, and detailed notes were taken to capture each stakeholder's point of view. Additionally, the City distributed an online survey to gather additional input about the community's needs. The consultations helped establish a foundation for the HOME-ARP Allocation Plan by identifying the needs, services gaps, and how HOME-ARP grant funds can best serve the qualifying populations. The City will use this information to inform its strategy to distribute HOME-ARP funds for qualifying populations.

The following table shows the agencies consulted, the type of agency, the method of consultation, and any feedback provided about the needs and gaps in services in the community.

***List the organizations consulted:***

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
<b>City of Rockford Health and Human Services</b>	CoC(s)	Interview	Demand for rent assistance is high. Unmet needs include non-congregate shelter due to capacity issues, quality, affordable units, source of income protections, and adequate major systems in homes like heating and water. Issues include property owners with poor intentions, like not wanting property inspections and pursuing illegal evictions, and high condemnation rates. Characteristics associated with instability include gig employment, domestic violence, generational poverty, crime, and lack of education and training. Demand for rent assistance is high for youth under 25.
<b>Northern Illinois Homeless Coalition</b>	CoC(s)	Interview	Community and Economic met with the Northern Illinois Homeless Coalition. Feedback was provided in a small group setting. Needs include more affordable units, property owners educated about

			<p>working with assistance programs, sources of income protections, improved condition of housing, and less predatory leases. Instability associated with couch surfing, substance abuse, burned bridges with family/support networks, mismanagement of income, bad quality of housing, lack of major systems in the home like heating and plumbing, and lack of basic home maintenance.</p>
<b>Family Peace Center</b>	Domestic Service Providers	Interview	<p>Shelter capacity is an issue because beds fill up quickly, and hotels are at capacity. DV clients do not have documented history of homelessness and are not eligible for certain City services. Survivors with children and pets are hard to shelter due to shelter restrictions. Survivors do not have good rental history to secure adequate housing. Clients need long-term solutions to provide a fresh start with permanent stability. Additional units are needed due to COVID restrictions on congregate shelters. The City needs another shelter to provide more subsidies for the current housing stock and to build new units where DV survivors are prioritized.</p>
<b>Liam Foundation</b>	Public or private organizations that address civil rights	Small Group Forum	<p>The agency provides resources for the LGBTQ community. More than half of clients are youth under age 25 with a lack</p>

			of family support networks. There is a lack of shelter options due to lifestyle. The community needs inclusive shelters with fewer barriers to entry. Developing a crisis center with inclusive systems to include client programming such as financial literacy, substance abuse education, or sex trafficking awareness. The City needs solutions-based programs that move clients to stable, permanent housing.
<b>NiREACH</b>	Public housing agency	Interview	Nonprofit Housing Provider that administers project-based vouchers, VASH, and traditional vouchers. Families at greatest risk of housing instability need supportive services that provide clients with the tools and resources to maintain stable housing. These families include youth aging out of foster care and people reentering society from prison. Current shelter, housing, and service delivery gaps include agencies working in silos.
<b>Prairie State Legal Services</b>	Public or private organizations that address civil rights and fair housing	Small Group Forum	The community needs inclusive shelters with fewer barriers to entry. Developing a crisis center with inclusive systems to include client programming such as financial literacy, substance abuse education, or sex trafficking awareness. The City needs solutions-based programs that move clients to stable, permanent housing.

<b>RAMP Center for Independent Living</b>	Public or private organizations that address the needs of persons with disabilities	Small Group Forum	RAMP-CIL is a nonresidential center for persons with disabilities. Feedback was provided in a collective group forum. Unmet housing needs include a lack of affordable inventory, shortage of 1-bedroom units, very low income of clientele, units not accessible for those with disabilities, and property owners are not sympathetic to clients with evictions even with subsidies, and no inclusive housing for the LGBTQ community or domestic violence survivors. Property owners need education and incentives to improve conditions for tenants and to release more inventory for vulnerable populations. Housing stability is key for vulnerable citizens. Without housing, case managers cannot assist with the root causes of poverty. The main goal is to assist clients in becoming independent.
<b>Remedies Renewing Lives</b>	Domestic Service Providers	Interview	Domestic Violence service provider for Boone and Winnebago County operates a crisis hotline. Provide individual therapeutic services and transitional housing. Housing is a significant barrier for any survivor. COVID has exacerbated the problem. All clients are referred to a single point of entry, and it is up to the client to access the system. Property owners and building owners are hesitant



			<p>to accept assistance funding. Most survivors have an eviction history. People are staying in shelters for longer than the 3-month standard. There are limited housing options with long turn-around times to place someone in housing. Not enough affordable, safe units with property owners willing to work with survivors. There are not enough transitional housing units.</p> <p>Characteristics associated with housing instability include being a survivor of domestic violence, stalking or sex trafficking. Shelter is the heart of DV programs but only a temporary solution.</p>
<b>Rockford Housing Authority</b>	Public housing agency	Interview	<p>Manages 1200 units of public housing and/or subsidized housing. Market study revealed that there was a shortage of 4900 units in the area. Many of the clients for RHA are single African American women with 2 children who are unemployed or underemployed. The needs are transitional housing for domestic violence survivors, reentry programs, and homeownership. Has not been able to use City rental assistance to supplement public housing rent. New unit development needs to include supportive services onsite with a small footprint of 4-6 units. Waitlists are long.</p>

<b>Rockford Rescue Mission</b>	Homeless Service Providers	Interview	Only congregate shelter in the Northern Illinois Homeless Coalition area. The shelter is currently full and operating at a reduced capacity due to staffing issues. Currently housing up to 65 men and 65 women with a max capacity of 125 men and 120 women. Also operates the overnight café for 50 people from January 1 <sup>st</sup> through March 31 <sup>st</sup> . Housing instability is associated with a lack of affordable units, low wages, evictions, and generational poverty. The shelter is seeing an increased risk of youth under 25 accessing services. Would like to see the City acquire an old hotel and convert it to a non-congregate shelter to address needs or provide additional rental assistance and supportive services to sustain permanent housing. Providing additional life-skills training like financial literacy and basic home maintenance. Differentiate domestic violence and partner abuse.
<b>Rosecrance</b>	Homeless Service Providers	Small Group Forum	Behavioral health provider, shelter plus care administrator, and manages 12 VA beds. Feedback was provided in a small group setting. Needs include more affordable units, property owners educated about working with assistance programs, sources of income protections,

			improved condition of housing, and less predatory leases. Instability associated with couch surfing, substance abuse, burned bridges with family/support networks, mismanagement of income, bad quality of housing, lack of major systems in the home like heating and plumbing, and lack of basic home maintenance.
<b>Salvation Army</b>	Public agencies that address the needs of qualifying populations	Small Group Forum	<p>Administers homeless-related programs in the community. States that about 5-10% of the Rockford population is experiencing some form of homelessness. Gaps in services include having a single point of entry system. Most clients are not patient and do not have the resources to follow this system. The system is too narrow for the population size (250k+). HUD's definition of homelessness does not align with the transient population that is living house to house, which puts a financial burden on the households trying to assist.</p> <p>Characteristics of housing associated with instability and an increased risk of homelessness include domestic violence, which is the top crime in Rockford, mental health, and unseen homeless (i.e., Transient Individuals (couch surfing)).</p>

<b>Veteran's Administration</b>	Veterans Groups	Small Group Forum	<p>Veteran's Administration administers VASH vouchers for veterans. Feedback was provided in a collective group forum. Unmet housing needs include a lack of affordable inventory, shortage of 1-bedroom units, very low income of clientele, units not accessible for those with disabilities, property owners are not sympathetic to clients with evictions even with subsidies, and no inclusive housing for the LGBTQ community or domestic violence survivors. Property owners need education and incentives to improve conditions for tenants and to release more inventory for vulnerable populations. Housing stability is key for vulnerable citizens, without housing case managers cannot assist with root causes of poverty. The main goal is to assist clients in becoming independent.</p>
<b>Veteran's Path to Hope</b>	Veterans Groups	Small Group Forum	<p>Veterans Path to Hope is a nonresidential center for veterans to receive housing and other assistance. Feedback was provided in a collective group forum. Unmet housing needs include a lack of affordable inventory, shortage of 1-bedroom units, very low income of clientele, units not accessible for those with disabilities, property owners are not sympathetic to clients with evictions even</p>

			with subsidies, and no inclusive housing for the LGBTQ community or domestic violence survivors. Property owners need education and incentives to improve conditions for tenants and to release more inventory for vulnerable populations. Housing stability is key for vulnerable citizens. Without housing, case managers cannot assist with root causes of poverty. The main goal is to assist clients in becoming independent.
<b>Zion Community Development Corporation</b>	Public agencies that address the needs of qualifying populations	Small Group Forum	Zion CDC is a community development corporation that develops housing for low income. Feedback was provided in a collective group forum. Unmet housing needs include a lack of affordable inventory, shortage of 1-bedroom units, very low income of clientele, units not accessible for those with disabilities, property owners are not sympathetic to clients with evictions even with subsidies, and no inclusive housing for the LGBTQ community or domestic violence survivors. Property owners need education and incentives to improve conditions for tenants and to release more inventory for vulnerable populations. Housing stability is key for vulnerable citizens. Without housing, case managers cannot assist with root causes

			of poverty. The main goal is to assist clients in becoming independent.
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*Table 1: Summary of Consultation Feedback*

***Summarize feedback received and results of upfront consultation with these entities:***

**Community Needs:**

- More quality, affordable units for families of all sizes and income ranges. The consultation revealed that many units are in poor condition and not suitable for living.
- More non-congregate units especially for those fleeing domestic violence and with severe mental health issues. The composition of the family may not be suitable for congregate shelter options, and in these instances, parents fleeing domestic violence are often separated from their children. Also, shelter programs cannot manage certain mental illness diagnoses in a congregate setting which can cause an unsafe environment for other guests of the shelter.
- More shelter and housing options for youth under 25 as there has been an increase in youth homelessness. Homeless youth often lack support networks to assist them in attaining permanent housing and are often aging out of foster care or identifying as LGBTQ.
- Rockford needs more supportive services to include case management, financial literacy, property owner/tenant rights education, mental health counseling, drug abuse education, and legal assistance.

**Administrative Needs:**

- More funding for staffing due to staff shortages at emergency shelters and service provider agencies. The consultation revealed that there are underutilized/vacant shelter beds that cannot be used because of staffing shortages.
- Faster response time with assistance payments. Service providers stated that a barrier to housing clients with subsidies is delayed payments/reimbursements for rental assistance.
- Improved relationships between property owners, tenants, and service providers. The consultation revealed that the current relationship between private property owners and the service providers is fragile. Property owners do not trust the system and refuse to rent to clients receiving assistance. They are issuing predatory leases and refusing tenants with prior evictions.
- Review of city policies to ensure current policy support ongoing efforts to improve housing stability. The consultation revealed that some areas have outdated zoning regulations that prevent the development or use of shelters or residential units. Policies should be reviewed and updated accordingly.

## Public Participation

*Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:*

Assessing community housing needs and receiving public input is one of the most important steps in preparing the HOME-ARP Allocation Plan. The City of Rockford has assessed data and feedback from stakeholders and citizens on the projects and activities being proposed or undertaken that will address those needs utilizing HOME-ARP grant funding from HUD.

To notify the public of the development of the Plan, the City of Rockford distributed virtual surveys through various internal departments and nonprofit organizations to obtain feedback from public. Surveys were available from January 29, 2023- February 13, 2023. Using the same notification methods, the City of Rockford Community & Economic Development Department published the Proposed HOME-ARP Allocation Plan and Amended Annual Action Plan public hearing notice in the Rockford Register Star on February 15, 2023. Two public hearings will be conducted to inform the public of the proposed HOME-ARP activities and to receive citizen input on said recommendations. The public comment period for citizen input commenced on the date of the published public notice on February 22, 2023, and ended on March 9, 2023.

The City of Rockford Community & Economic Development Department office will conduct its public hearings on Thursday, March 2, 2023, at noon and 5:30 pm. Public comments received at the public hearings will be summarized in this section before the final draft is submitted to City Council and HUD for approval.

The timeline for public comment is listed below:

- **Public Notice Published:** Wednesday, February 15, 2023
- **Public Comment Period:** Wednesday, February 22, 2023, through Thursday, March 9, 2023
- **Public Hearings:** Thursday, March 2, 2023, at 12:00 noon and 5:30 pm

*Describe efforts to broaden public participation:*

The City of Rockford is committed to keeping all interested groups and individuals informed of each phase of the planning process. Rockford will continue to maintain communication with citizens, nonprofit organizations, local agencies, City & County offices and officials, and stakeholders by implementing the following efforts:

- Conduct virtual or in-person workshops and public hearings in various formats or at multiple venues throughout the city.



- Ensure meetings are held at a convenient time and location for citizens and stakeholders to attend and have ADA accessibility for all persons with disabilities and interpretation for limited English proficiency clientele when requested.
- Use of electronic, digital, and printed media to solicit public participation through various media outlets to citizens, Municipal employees, nonprofit organizations, and local businesses.
- Translate public notices and related materials for limited English proficiency clientele when requested.
- Review and respond to all citizen comments and incorporate such comments in required submissions, as applicable.
- Analyze the impact of program activities on neighborhood residents, particularly low and moderate-income persons.

***Summarize the comments and recommendations received through the public participation process either in writing or orally at a public hearing:***

All comments received at the public hearings are summarized here for review by the City Council for approval and HUD. Representatives from nonprofit service providers, the housing authority, city staff, and the realtor's association attended the public hearing on March 2, 2023, held at Katie's Cup. Participants asked the following questions, and subsequent answers were provided.

1. Why is no money allocated to the non-congregate shelter activity when the needs identified a need for more non-congregate shelter units?
  - Answer: The amount of funding available is not enough to address that need, and the city has identified preferences for other qualifying populations. Other funding will be utilized to support current shelter options.
2. Will any funding be allocated to crisis services for those that cannot go to current shelters, such as members of the LGBTQ community?
  - They will be considered with other clients if they meet the criteria for funding.
3. Will supportive services funds go to other agencies that provide services? Will all money go directly to Remedies?
  - Yes, the city will do an application cycle or open RFP for agencies to apply.
4. Has a funding source been identified for long-term maintenance of the newly developed rental units?
  - No, that is going to be phase two, where the city seeks technical assistance on how to address long-term compliance.
5. How many units will \$2 million produce? What is the timeline for implementation?

- Current plans propose 20 units. The city was very conservative in its estimates and hoped to be able to produce more by layering with other funding. The plan is due by the end of March, and the city has until 2030 to complete the project.
6. Does TBRA also include utility assistance?
    - Yes, it can, but it depends on how the agency administers its program.
  7. What does the rental housing funding look like as far as implementation goes?
    - Development of new rental units. Will be able to identify a more detailed plan once proposals are submitted.

Other general comments received included the following:

- a. Remedies is only designed to serve women and children, but there are several families that do not meet the criteria because they have a male child.
- b. Please do not give Rockford Rescue Mission any more funding. They do not follow HUD's regulations in serving anyone who meets the criteria; they turn away people that do not believe in Jesus.
- c. Rockford needs to create something that does not exist. They need shelter to serve all community members regardless of religious affiliation.
- d. It is tough to serve people in the community with the lack of options.
- e. Equitable Social Solutions in Madison has a hotel-to-housing program that could be a good model to replicate in Rockford.
- f. Current shelter options do not allow families to stay together. Men must go to separate areas from wife and female children. If the male child is of a certain age, they cannot remain with the mother.
- g. LIAM foundation (LGBTQ) feels the agency is always overlooked and underfunded. The city needs to put more funding towards the issue and concern for other members of the community. The agency provided service to over 156 clients last year.

Participants from the public and media attended the second meeting held on March 2, 2023, at Crusaders Clinic Community Room, and the following comments were received:

1. What does over \$2million for rental housing mean?
  - The city is proposing to create approximately 20 new units of housing. The City is giving preference to victims fleeing domestic violence or accompanied youth.
2. When you say "affordable," is that the same as public housing?
  - No, units will not be owned by Housing Authority. They [applicants] may be able to connect through the Housing Authority for assistance.

3. Is there an identified area for the 20 units?

- No, it is still in the planning phase. Once the plan is approved, the city will put out an RFP to solicit proposals from developers.

Other general comments received were as follows:

It is important for residents in the community to be a part of the process of moving things in new and positive directions. Want more efforts to be made by the leaders to include current residents in the planning and development process of new projects. Citizens must take up responsibility for the direction of their community. If they are not engaged, they will be on the downside of the redevelopment of this [13<sup>th</sup> Ward] area.

***Summarize any comments or recommendations not accepted and state the reasons why:***

Any written or verbal comments or recommendations were accepted.

## Needs Assessment and Gaps Analysis

### Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family	Adult	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds	HH (at least 1 child)	HH (w/o child)			# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	95	27	208	208	0								
Transitional Housing	99	39	46	46	14								
Permanent Supportive Housing	167	48	319	319	111								
Other Permanent Housing	53	14	6	6	0								
Sheltered Homeless						235	110	19	52				
Unsheltered Homeless						3	58	2	0				
<b>Current Gap</b>										414	128	579	579

Table 2: Homeless Needs Inventory and Gap Analysis Table

**Data Sources:** 1. 2022 IL501- Rockford/DeKalb, Winnebago, Boone Counties CoC Point in Time Count (PIT); 2. 2022 IL-501 Rockford/DeKalb, Winnebago, Boone Counties Continuum of Care Housing Inventory Count (HIC); 3. HOME-ARP Consultations

### Housing Needs Inventory and Gap Analysis Table

The City of Rockford calculated the level of need using the most recent Comprehensive Affordable Housing Strategy (CHAS) data, which has had three additional releases since the City completed its Housing Needs Assessment for its 2020-2024 Consolidated Plan. This data demonstrates the extent of housing problems and housing needs, particularly for low-income households.

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	33,241		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	2,829		
Rental Units Affordable to HH at 50% AMI (Other Populations)	7,722		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		6,695	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		3,875	
<b>Current Gaps (Net)</b>			19
<b>Current Gaps at 30% AMI</b>			3,866
<b>Current Gaps at 50% AMI</b>			-3,847

Table 3-Non-Homeless Needs Inventory and Gap Analysis Table.

**Data Sources:** 1. 2021 American Community Survey (ACS) Selected Housing Characteristics; 2. 2015-2019 Comprehensive Housing Affordability Strategy (CHAS); 3. National Low Income Housing Coalition – Out of Reach Report for Rockford MSA -2022; 4. HOME-ARP Consultations

**Describe the size and demographic composition of qualifying populations within the PJ's boundaries:**

All data include Rockford/DeKalb, Winnebago, and Boone Counties because homeless data is collected by CoC and not desegregated by individual cities or counties. Service providers confirm that, effectively, all homeless persons seeking services are in Rockford since all homeless services are in the City of Rockford. The City will only use HOME-ARP funds in the City of Rockford to ensure compliance with HUD guidelines.

**Homeless as defined in 24 CFR 91.5**

Per HUD's definition of homeless under the HOME-ARP grant, individuals and families considered homeless include:

- An individual or family who lacks a permanent and adequate permanent home.
- A person or family who will imminently lose their permanent home due to a lack of resources or support.
- Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition

At the time of this study, 2023 Point In Time (PIT) Counts were unavailable, so the most recent PIT data was used to describe the size of the population. According to the FY2022 PIT Count, there were 406 homeless persons in the Rockford/Dekalb, Winnebago, and Boone Counties COC.

Homeless Category	Number
<b>Sheltered</b>	<b>345</b>
- <i>Transitional Housing</i>	<i>121</i>
- <i>Emergency Shelter</i>	<i>224</i>
<b>Unsheltered</b>	<b>61</b>
<b>Youth under 25</b>	<b>140</b>
- <i>Unaccompanied</i>	<i>42</i>
<b>Total</b>	<b>406</b>

Table 4: Homeless Count

#### **At Risk of Homelessness as defined in 24 CFR 91.5**

HUD defines those at risk of homelessness as individuals and families who have an income below 30% of the area median income (AMI), do not have sufficient resources or support networks to prevent them from becoming homeless or live with instability, like moving two or more times during the last 60 days due to economic reasons.

According to HUD's Comprehensive Housing Affordability Strategy data, there are 11,475 households with incomes less than 30% of Annual Median Income (AMI). Of those households, 8,915 are renters, and 6,695 are experiencing at least one of the following housing problems: cost burden, overcrowding, lack of kitchen facilities, or lack of plumbing facilities. Furthermore, 2,870 experiencing are experiencing all four of the housing problems listed above. According to Community Housing Affordability Strategy Data (CHAS), 100% of renters and 75% of homeowners with incomes less than 30% AMI are cost-burdened, meaning they use more than 30% of their income for housing-related costs.

Stakeholder consultations support these data trends in highlighting the four-housing problem stating that very-low income and being cost-burdened are significant factors in housing instability.

#### **Fleeing, or Attempting to Flee**

For HOME-ARP, this population includes any individual or family who is fleeing or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. It includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit.

Limited data captured during the FY 2022 Annual Point in Time Count revealed there were 58 survivors of domestic violence, of which 24 were sheltered in emergency shelters and 29 in transitional housing. Five survivors were unsheltered. Local, up-to-date, comprehensive data on victims of domestic violence is difficult to obtain, as service providers do not use HMIS and may use different databases that must follow required privacy laws. A reliance on local data from local stakeholders regarding domestic violence is critical to identifying the need for DV survivors. Consultations revealed domestic violence as a cause for seeking services through the homeless service system.

### **Other Populations**

HOME-ARP qualifying populations also include others who have previously qualified as homeless, are currently housed with temporary or emergency assistance, and need additional housing assistance or supportive services to avoid returning to homelessness. In addition, HUD defines those at greatest risk of housing instability as households that have an annual income less than 30% AMI and are experiencing severe cost burden or have an income less than 50% AMI and meet a specific condition, like living in someone else's home or living in a hotel due to economic hardship.

According to CHAS data, 100% of renters and 75% of homeowners with incomes less than 30% AMI are cost-burdened, meaning they use more than 30% of their income for housing-related costs.

***Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):***

The City of Rockford administers several programs through the Health and Human Services Community Services Division that include the following:

### **Housing Assistance Programs**

- **Rapid Rehousing** – Assists persons who are literally homeless (living on the streets or in shelters).
- **Homeless Prevention** – Assists persons who have experienced a short-term crisis beyond their control with rent or mortgage assistance to remain housed.
- **Condemnation Relocation** – Assists persons whose housing has been condemned with one month's payment of rent at a new location.

### **Homeless Single Point of Entry**

All literally homeless persons (on streets or in shelters), as well as homeless youth, veterans, and survivors of domestic violence, access housing services through the Homeless Single Point of

Entry for the homeless in the community. They are assessed for permanent housing, and a housing plan is developed.

### **Foster Youth Housing Assistance Program**

Youth who have aged out of foster care aged 18-21 who are either homeless or having problems with housing receive support and services to help them become housed; no referral is needed. These same services are available to Department of Children & Family Services (DCFS) involved families with a referral from their caseworker.

### **Continuum of Care/Northern Illinois Homeless Coalition**

The Northern Illinois Homeless Coalition serves as the HUD-recognized Continuum of Care, the decision-making body for homeless program coordination for the jurisdiction serving Rockford and DeKalb, Winnebago, and Boone Counties. Community Services provides support and technical assistance to the Northern Illinois Homeless Coalition. Community Services also is responsible for coordinating the application process for the HUD Continuum of Care competitive grant funding that awards funds to organizations that provide homeless services and serves as administrator of those grants. The Coalition includes a broad representation of relevant organizations and agencies as well as interested individuals charged with:

- community-wide planning and strategic use of resources to address homelessness.
- improving coordination and integration with mainstream resources and other programs targeted to people experiencing homelessness.
- promoting the quick re-housing of homeless individuals and families
- improving data collection and performance measurement to ensure program success

### ***Describe the unmet housing and service needs of qualifying populations:***

The needs of each qualifying population are similar, but the extent of each population's needs may depend on the circumstances of the family or individual. The identified needs underscore the need for a flexible and inclusive response system, decent and affordable housing units, and services to prevent homelessness. The sections below outline the unmet needs of each of the qualifying populations.

#### **Homeless as defined in 24 CFR 91.5**

Individuals and families enduring unsheltered homelessness are at a greater risk of continued harm living in outside spaces that are not meant for living. They have a higher rate of morbidity and mortality resulting from exposure to the elements, substance abuse, the heightening of pre-existing mental health issues, and developing or exacerbating physical health issues that can result in death. Long periods of living without shelter also put individuals and families at a greater risk of social isolation and the chance of victimization and criminalization.

#### **Unmet Needs:**

- Shelter space and housing options for youth under 25.



- Shelter staff to increase shelter capacity. The only shelter in the City is operating at 53% capacity.
- Case Management for families experiencing homelessness.

**At Risk of Homelessness as defined in 24 CFR 91.5**

According to most recent CHAS data, there are at least 8,270 extremely low-income renter households (under 30% AMI) with one or more severe housing problems. This population is currently housed but is also at high risk of becoming homeless due to rent increases and the lift on eviction moratoria. Any challenges, from a reduction in work hours or unemployment to health issues or loss of services, are significant risks to these individuals and households becoming homeless. These households are in most immediate need of an affordable housing unit to become stably housed, along with a range of programs and services to prevent them from becoming homeless.

**Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice**

Of the 406 homeless people in the 2020 PIT, 52 were also fleeing domestic violence, and this is very likely a significant undercount. Of these, five were unsheltered. Domestic Violence is a multifaceted issue that requires a well-coordinated community response that will address the immediate needs of those fleeing. This involves having immediate access to safe and stable shelter, intensive counseling, advocacy, and other supportive services, such as food, translation services for non-native-speaking persons, job training and placement services, and legal assistance. Additional short- and long-term subsidies may also be required to assist with other expenses to help stabilize individuals and families financially.

**Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice**

An individual or family determined to be at risk of homelessness has an annual income below 30% of the median family income for the area. These include households that have been qualified as “homeless,” as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, and require additional housing assistance or supportive services to avoid returning to homelessness.

Although affordable housing is part of the solution, some people may require their housing needs coupled with supportive services to maintain it. For instance, service providers can help households with limited or loss of income pay their rent on time to avoid losing their housing or can make sure people who were previously homeless are housed and receiving assistance and supportive services to avoid a return to homelessness.

***Identify any gaps within the current shelter and housing inventory as well as the service delivery system:***

#### **Shelter**

A gap in shelter capacity exists as the City only has one emergency shelter that operates at 53% capacity due to staffing shortages. There is also a gap in shelter inventory for inclusive shelters that can accommodate a wide range of household structures. Traditional shelter options may not be suitable for youth under 25 and individuals/families fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking.

#### **Housing Inventory**

There is a gap in housing inventory for quality, affordable units in Rockford for renters at the extremely low-income level. Data in Table 3: Non-Homeless Inventory and Gap Analysis show that there is a need for 3,866 units affordable for this population. Characteristics of families needing additional subsidies include youth under 25, individuals fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking, and households with incomes less than 30% AMI. Some barriers to accessing housing at this income level include extremely low income, employment, and coexisting issues (mental health, disability, age).

#### **Service Delivery System**

There is a gap in the service delivery system for coordination of services and trust in the system to run efficiently. Renters are finding it difficult to use subsidy programs due to property owners' unwillingness to accept subsidy payments and unwillingness to work with clients who have past evictions, credit challenges, or criminal history.

***Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of "other populations" that are "At Greatest Risk of Housing Instability," as established in the HOME-ARP Notice. If including these characteristics, identify them here:***

Based on stakeholder input, instability in housing is associated with the following:

- Domestic Violence, Stalking, and Sex Trafficking
- Inflation, Generational Poverty, and Lack of Livable Wages and Financial Education
- Mental Health
- Poor Condition of Housing
- Evictions
- Lack of Education
- Transient Homeless increasing burden on family and friends
- Substance abuse

- Lack of supportive services that provide clients with the tools and resources to maintain stable housing.

***Identify priority needs for qualifying populations:***

The City of Rockford has elected to prioritize increased housing options for domestic violence survivors and unaccompanied youth that are at risk of homelessness. Long-term objectives include supporting emergency housing and supportive services with the inclusion of the coordinated entry system. The identified projects and activities will target vulnerable individuals and families who lack the resources to independently regain stable housing. There is also a need for supportive services and increased access to affordable housing units for cost-burdened households and victims of domestic violence. Supportive services are necessary to ensure clients are connected to proper resources that will bridge the gap between emergency shelters and transitional housing to permanent housing.

***Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:***

Although the City of Rockford offers many emergency services to those experiencing homelessness, several gaps have been identified through reviewing available resources, conducting consultation sessions, and analyzing system needs. Gaps and needs were identified through extensive stakeholder engagement with the local CoC serving the City of Rockford area, homeless and domestic violence service providers, veterans' groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, and the needs of persons with disabilities. The level of need was determined by evaluating the number of unsheltered households and the level of resources available to adequately house the families or individuals with permanent supportive services to achieve housing stability. Ongoing coordination between the Community & Economic Development and Health and Human Services departments assisted in identifying local needs, which helped to determine how to best utilize the HOME-ARP allocation.

## HOME-ARP Activities

***Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:***

The City of Rockford will publish a Request for Proposals (RFP) and any addendums through the City's Central Purchasing Department at least 10 days before the due date. The RFP will notify respondents of the City's grant allocation and funding priorities outlined in this plan. All RFPs received will undergo a fair and thorough review by a team of City staff who certify that they have no conflict of interest. Once RFPs are scored, projects are selected, and respondents are notified

through an award notice from the Community & Economic Development Department. The recommendation is then presented to the City Council to affirm the award of the contract. The Central Purchasing Department notifies respondents that were not selected.

The City will award funds to the bidder that best aligns with the needs of the RFP, ensuring that the bidders define a project that best aligns with the City's established priorities, the needs assessment, and the HOME-ARP grant program requirements. In its RFP process, the City will ensure that potential applicants are made aware that no member of the qualifying population can be limited from accessing the program. Therefore, all members of the qualifying populations will be eligible to receive services. Since consultation revealed that select segments of the qualifying population have more critical needs not addressed through traditional funding sources, the City will impose a preference by awarding additional points for proposals that prioritize assistance for:

- Persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking.
- Households that have annual income less than or equal to 30% area median income and are experiencing a severe cost burden defined as paying more than 50% of monthly household expenses toward housing costs.
- Unaccompanied youth under 25 years of age or families with children and youth, who do not otherwise qualify as homeless under this definition, but who meet one of the four following criteria:
  - (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
  - (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance.
  - (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance: or
  - (iv) Can be expected to continue in such status for an extended period because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the

presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

The Community & Economic Development Department ensures that the City of Rockford, an entitlement community, maximizes the use of its HUD funding to provide need affordable housing solutions for the City's residents.

***Describe whether the PJ will administer eligible activities directly:***

The City of Rockford will administer the rental housing development program and the tenant-based rental housing program directly. The supportive services program will be administered by subrecipients. Nonprofits will be able to submit proposals for HOME-ARP funds through an RFP process. The process will allow nonprofit agencies to submit proposals to assist the City in meeting the needs of the qualifying populations.

***If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:***

The City of Rockford will not provide HOME-ARP administrative funds to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 700,000.00	19.6%	N/A
Acquisition and Development of Non-Congregate Shelters	\$ 0.00	0%	N/A
Tenant Based Rental Assistance (TBRA)	\$ 300,000.00	8.4%	N/A
Development of Affordable Rental Housing	\$ 2,042,161.00	57%	N/A
Non-Profit Operating	\$ 0.00	0%	5%
Non-Profit Capacity Building	\$ 0.00	0%	5%
Administration and Planning	\$ 536,851.00	15.0 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 3,579,012.00</b>		

*Table 5: Use of HOME-ARP Funding*

***Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:***

The City of Rockford's HOME-ARP allocation of \$3,579,012.00 will be split between the costs of the development of an affordable rental housing project (\$2,042,161.00), the costs of carrying out supportive services for qualifying populations (\$700,000.00); the cost of providing tenant-based rental assistance (\$300,000.00); and administration and planning for the City (\$536,851.00). These implementation costs include funding to utilize nonprofit partners for various aspects of the program. Funds are distributed per priorities identified in this plan as described below:

**Administration**

The City of Rockford will use HOME-ARP administration funds to provide management and oversight of the program and to ensure compliance with HOME-ARP regulations. Rockford city staff will use 15% of its allocation for Administration.

**Rental Housing**

The City of Rockford will use HOME-Rental Housing funds to develop affordable housing units. Developers will be able to apply for HOME-ARP funds through an RFP process. The process will allow developers to pair HOME-ARP funds with other funding like Low-Income Housing Tax Credit (LIHTC) funds. The City will use 57% of its HOME-ARP allocation for rental housing development.

**Tenant-Based Rental Assistance (TBRA)**

The TBRA program will allow the City to provide rental assistance, security deposit payments, and utility deposit assistance to qualifying households. HOME-ARP funds may be used to pay for up to 100% of these eligible costs. The City will use 8.4% of its allocation for TBRA.

**Supportive Services**

The City of Rockford will solicit the use of subrecipients to administer supportive services. Nonprofits will be able to apply for HOME-ARP funds through an RFP process. The process will allow nonprofit agencies to submit proposals to assist the City in meeting the needs of the qualifying populations. These services include the costs of direct services provided on behalf of the client and the costs of labor (salary plus benefits), supplies, or materials incurred by the subrecipient directly providing services to program participants. The City will use 19.6% of its allocation for supportive services.

***Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:***

All homeless individuals enter through the Single Point of Entry and are served by participating members of the Rockford/Dekalb, Winnebago, and Boone Counties Continuum of Care. Homeless individuals are assigned to the appropriate housing, which may include emergency or transitional

locations, while waiting for a permanent housing slot to open. The CoC has a variety of emergency and transitional units for this purpose. Hotel vouchers are used as needed if a household is not shelter appropriate. During winter months, “overnight cafes” open, creating a warm place to go for those who will not or cannot access shelter services.

As listed in the City’s 2023 Annual Action Plan, the City of Rockford has reached “functional zero” for veterans and those who are chronically homeless. This means the City of Rockford has reached a target number (seven for veterans and three for chronic) and has been able to maintain that number for over 90 days. It also means service providers rapidly rehouse newly homeless veterans and new chronically homeless in less than 30 days.

Based on the 2022 Point-in-Time (PIT) Count Report for Rockford/Dekalb, Winnebago, and Boone Counties COC, there is a total of 297 homeless households, which consist of 53 unsheltered homeless persons and 21 chronically homeless persons.

The HUD 2015-2019 CHAS data identified 8,270 renter households with incomes less than 30% AMI and an additional 6,795 renter households with incomes between 30% and 50% AMI who were severely cost-burdened, which may include lacking kitchen or complete plumbing, severe overcrowding, or severe cost burden. These households are at significant risk of homelessness, and as their housing stability deteriorates, they are likely to further increase the need for additional shelter capacity. Additionally, these households are in the most immediate need of an affordable housing unit. The number of persons who are severely cost-burdened can be reduced using HOME-ARP funds to produce affordable rental housing.

The addition of HOME-ARP rental units coupled with supportive services for nonprofit organizations can assist in easing the burden of housing costs for the city’s lowest-income renters who are at high risk of housing instability and homelessness or currently experiencing homelessness and seeking opportunities for housing stability.

## HOME-ARP Production Housing Goals

***Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:***

The City of Rockford anticipates producing 20 units of affordable housing that will support HOME-ARP qualifying populations. This is based on new construction and may increase if the appropriate multi-unit project comes forward.

***Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:***

The City of Rockford intends to develop land to create 20 units of housing to support the qualifying populations. The homes will become part of the City's rental housing program inventory and will be leased to Qualifying Populations (see page 2). The agencies will work collaboratively with organizations that provide case management and wrap-around services to the families placed in rental housing. This program addresses the priority need of the lack of rental housing for families who meet the criteria as a member of the qualifying populations.

## Preferences

***Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:***

HUD defines a preference as providing a priority for selecting applicants who fall into a specific QP or category within a QP (i.e., subpopulation) to receive assistance. A preference permits an eligible applicant that qualifies for a City adopted a preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference.

The main reason people cannot access emergency shelters or other homeless assistance is that there is not enough housing or emergency shelter to inclusively accommodate every individual or family who is eligible and presents for assistance. The City needs to prioritize who receives assistance to ensure its most vulnerable citizens are stabilized in shelters, transitional housing, or permanent housing.

The City of Rockford's HOME ARP program will not exclude eligible applicants from any of the four Qualifying Populations from applying and receiving services from HOME-ARP services. However, to ensure that the needs of the city's most vulnerable clients' needs are met, the City will impose a preference under HOME-ARP for applicants who are:

- Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking.



- Households that have annual income less than or equal to 30% area median income and are experiencing a severe cost burden defined as paying more than 50% of monthly household expenses toward housing costs.
- Unaccompanied youth under 25 years of age or families with children and youth, who do not otherwise qualify as homeless under this definition, but who meet one of the four following criteria:
  - (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
  - (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance.
  - (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance.
  - (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

All clients seeking services are referred to the Homeless Single Point of Entry. The client's needs will be evaluated and prioritized during the intake process, and clients meeting the criteria in the preference category will be served first under HOME-ARP. This preference does not constitute a limitation that excludes individuals or households qualifying under the four qualifying definitions from applying for the HOME-ARP project. It does prioritize the subpopulations listed above to receive services first and all other members of the qualifying population to receive services in chronological order.

***If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the***

***qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

Using a preference will assist the City in addressing the critical needs of the populations identified in the previous section by providing targeted solutions for vulnerable citizens. The needs assessment revealed that survivors of domestic violence, youth under 25, and residents with income less than 30% AMI had not been prioritized in the current coordinated entry process, which prioritizes chronic homelessness. Implementing a preference for the identified groups helps the city to use limited resources in a more targeted way.

**Survivors of Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking**

The needs assessment revealed that clients fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking have unique needs that are not prioritized under the existing coordinated entry process. Securing housing for clients who are fleeing or attempting to flee is challenging because these clients often have minimal financial resources and past evictions. Time is of the essence in assisting these families in finding new transitional or permanent housing to ensure the client's safety.

The needs assessment revealed that obtaining housing units in a relatively short timeframe (2-3 days) is difficult due to the need for a more affordable housing inventory. Service providers in Rockford also reported that property owners are hesitant to accept subsidy funding due to lengthy wait times to receive payment and perceived thoughts about clients who need assistance. Additionally, the family composition can cause challenges for clients fleeing or attempting to flee because shelter may not be available for families, thus requiring survivors to separate from their children or pets to receive services.

By prioritizing survivors fleeing or attempting to flee with HOME-ARP, the City is addressing this growing need. Using a preference for those fleeing or attempting to flee ensures that this population is prioritized for any new units developed, rental assistance, or services provided by Rockford nonprofits. It also ensures that the City can continue to support ongoing efforts that have been providing solutions and improving service delivery for survivors and property owners.

**Unaccompanied Youth under 25 and Families with Youth meeting Special Criteria**

The needs assessment also revealed that unaccompanied youth and families with youth meeting unique criteria are not prioritized in the current coordinated entry process. According to service providers in Rockford, this group requires more intensive case management to prepare them for adulthood. Clients in this category are often returning to homelessness and not accessing needed services because of a lack of knowledge on accessing programs, the timeframe to receive services, and existing resources not addressing the specific needs of this population.

By prioritizing youth, the City is taking an active approach to ensuring that youth who are experiencing homelessness are provided targeted services to address their unique needs. Using a preference for this group ensures that critical case management through supportive services can assist youth with essential life skills like obtaining identification, buying groceries, or making appointments. This group also benefits from rental units set aside for citizens in the priority group and subsidies for permanent housing.

**Families with income less than or equal to 30% AMI and are Severely Cost Burdened**

HUD defines those at greatest risk of housing instability as households that have an annual income of less than 30% AMI and are experiencing severe cost burdens. According to Comprehensive Housing Affordability Strategy (CHAS) data, 100% of renters and 75% of homeowners with incomes less than 30% AMI are cost-burdened, meaning they use more than 30% of their income for housing-related costs.

Families with extremely low incomes require additional community support and subsidies to reduce instability in housing. As the cost of housing continues to increase and the incomes of this population remain flat, the gap in housing options continues to grow. By prioritizing this group, access to newly developed housing units, subsidies for existing housing, and access to supportive services ensure that these families will begin to become stable in permanent housing.

## Referral Methods

*Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):*

The City will use the Northern Illinois Homeless Coalition coordinated entry process.

*If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):*

All qualifying populations eligible for a project or activity will be included in the coordinated entry process. Per the Coordinated Entry System policy, the Single Point of Entry (SPOE) will conduct an initial screening and assessment with a client to determine homeless status.

*If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):*

The City of Rockford will use the established coordinated entry process and a waiting list to prioritize services based on the preferences identified in the previous section. The current

coordinated entry prioritizes services as outlined below. The City will implement additional referral points for clients meeting the criteria outlined in the preference categories.

Each individual or family will be assessed using an initial questionnaire. In addition to the score that is received from the local preferences, which include verified residents of Winnebago/Boone/DeKalb counties for the previous 90 days will earn 20 points for a “Local Preference.” Individual applicants will be responsible for verifying residence. Verification can include a local ID (that is over 90 days old), HMIS system data, agency verification, public aid documentation, or school records for their children. If verification is not provided, they will automatically receive the points once they have been active on the list for 90 days. Chronically homeless and veterans will also receive 5 extra points (with verification). Domestic violence victims and youth (under age 24) will each receive an extra 4 points. Beginning January 1, 2019, families with children will become a priority population also. Households in this category will also receive 4 priority points when placed on the list. All individuals and families will be placed on their respective lists based on their scores and the date/time that they entered the system.

In accordance with the Housing First Model, those with the highest score will be directed to Permanent Housing options first (including supportive and non-supportive housing options), followed by Transitional Housing and Emergency Shelters. By conducting the above assessment, a score will be assigned, which will assist in determining which program type the client should be referred to.

***If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):***

In addition to using the Coordinated Entry process, the City will also use a waiting list to receive referrals from the coordinated entry process and other referring agencies. All applicants placed on the HOME-ARP waiting list are selected in chronological order.

## **Limitations in a HOME-ARP Rental Housing or NCS project**

***Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV. A of the Notice:***

The City of Rockford does not intend to limit eligibility for any qualifying population or any specific subpopulation for a qualifying population in a HOME-ARP rental housing or NCS project. The City recognizes that each case is different and will prioritize services to best serve those who are in the greatest need.

*If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:*

Not Applicable.

*If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):*

Not Applicable.

## HOME-ARP Refinancing Guidelines

*If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with 24 CFR 92.206(b). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:*

The City of Rockford has elected not to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing to be rehabilitated with HOME-ARP funds.

- *Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity*

Not applicable

- *Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.*

Not applicable

- *State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.*

Not applicable

- *Specify the required compliance period, whether it is the minimum 15 years or longer*

.

Not applicable

- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***

Not applicable

- ***Other requirements in the PJ's guidelines, if applicable:***

Not applicable

## HOME-ARP CERTIFICATIONS

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

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

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

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

Title Mayor



### Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

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

**\* Other (Specify):**

**\* 3. Date Received:**

04/04/2023

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

M21-MP170208

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

City of Rockford

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

36-6006082

**\* c. UEI:**

MPDSB2MNNM19

**d. Address:**

**\* Street1:**

425 E State St

**Street2:**

**\* City:**

Rockford

**County/Parish:**

**\* State:**

IL: Illinois

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

61104-1014

**e. Organizational Unit:**

**Department Name:**

Community & Economic Develop

**Division Name:**

Neighborhood Division

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

**Prefix:**

**\* First Name:**

Sarah

**Middle Name:**

**\* Last Name:**

Brinkmann

**Suffix:**

**Title:**

Housing and Program Manager

**Organizational Affiliation:**

**\* Telephone Number:**

779-348-7442

**Fax Number:**

**\* Email:**

Sarah.Brinkmann@RockfordIL.gov

## Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program (HOME)

### \* 12. Funding Opportunity Number:

M21-MP170208

\* Title:

HOME Partnerships Program - American Rescue Plan (HOME-ARP)

### 13. Competition Identification Number:

n/a

Title:

n/a

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

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

City of Rockford 2021 Annual Action Plan, HOME ARP Allocation Plan

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

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

\* a. Applicant

16

\* b. Program/Project

16

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

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

09/20/2021

\* b. End Date:

09/30/2030

**18. Estimated Funding (\$):**

\* a. Federal

3,579,012.00

\* b. Applicant

\* c. State

\* d. Local

\* e. Other

\* f. Program Income

\* g. TOTAL

3,579,012.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:

\* First Name:

Thomas

Middle Name:

P

\* Last Name:

McNamara

Suffix:

\* Title:

Mayor, City of Rockford

\* Telephone Number:

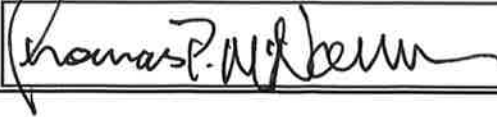
779-348-7300

Fax Number:

\* Email:

Thomas.McNamara@RockfordIL.gov

\* Signature of Authorized Representative:



\* Date Signed:

4-4-2023

**Application for Federal Assistance SF-424**

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

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

**\* Other (Specify):**

**\* 3. Date Received:**

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

M21-MP170208

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

City of Rockford

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

36-6006082

**\* c. UEI:**

MPDSB2MNM19

**d. Address:**

**\* Street1:**

425 E State St

**Street2:**

**\* City:**

Rockford

**County/Parish:**

**\* State:**

IL: Illinois

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

61104-1014

**e. Organizational Unit:**

**Department Name:**

Community & Economic Develop

**Division Name:**

Neighborhood Division

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

**Prefix:**

**\* First Name:**

Sarah

**Middle Name:**

**\* Last Name:**

Brinkmann

**Suffix:**

**Title:**

Housing and Program Manager

**Organizational Affiliation:**

**\* Telephone Number:**

779-348-7442

**Fax Number:**

**\* Email:**

Sarah.Brinkmann@RockfordIL.gov

## Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program (HOME)

### \* 12. Funding Opportunity Number:

n/a

\* Title:

n/a

### 13. Competition Identification Number:

n/a

Title:

n/a

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

Add Attachment

Delete Attachment

View Attachment

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Attach supporting documents as specified in agency instructions.

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\* a. Applicant

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If "Yes", provide explanation and attach

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☒ \*\* I AGREE

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**Authorized Representative:**

Prefix:

\* First Name:

Thomas

Middle Name:

P

\* Last Name:

McNamara

Suffix:

\* Title:

Mayor, City of Rockford

\* Telephone Number:

779-348-7300

Fax Number:

\* Email:

Thomas.McNamara@RockfordIL.gov

\* Signature of Authorized Representative:

\* Date Signed:

3/23/2023

**ASSURANCES - NON-CONSTRUCTION PROGRAMS**

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

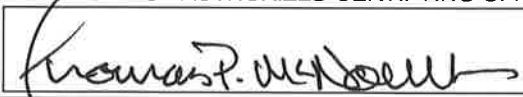
**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93- 205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor, City of Rockford
APPLICANT ORGANIZATION City of Rockford	DATE SUBMITTED 3-23-2023



Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

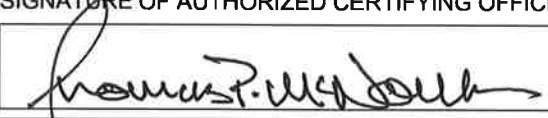
**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

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As the duly authorized representative of the applicant, I certify that the applicant:

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2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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APPLICANT ORGANIZATION City of Rockford	DATE SUBMITTED 3-23-2023



The State Journal-Register | Canton Daily Ledger  
The Courier | The Register-Mail | JournalStar  
The McDonough County Voice | Star Courier  
Pontiac Daily Leader | Pekin Daily Times  
Journal-Standard | Rockford Register Star

## Order Confirmation

Not an Invoice

<b>Account Number:</b>	636693
<b>Customer Name:</b>	City Of Rockford
<b>Customer Address:</b>	City Of Rockford 425 E State ST Community Development Rockford IL 61104-1014
<b>Contact Name:</b>	City Of Rockford
<b>Contact Phone:</b>	8159875626
<b>Contact Email:</b>	
<b>PO Number:</b>	

<b>Date:</b>	02/23/2023
<b>Order Number:</b>	8496329
<b>Prepayment Amount:</b>	\$ 0.00

<b>Column Count:</b>	1.0000
<b>Line Count:</b>	108.0000
<b>Height in Inches:</b>	0.0000

### Print

Product	#Insertions	Start - End	Category
RFD Rockford Register Star	1	02/26/2023 - 02/26/2023	Govt Public Notices
RFD rrstar.com	1	02/26/2023 - 02/26/2023	Govt Public Notices

<b>Total Order Confirmation</b>	<b>\$216.20</b>
---------------------------------	-----------------

# Ad Preview

## NOTICE OF AVAILABILITY OF THE CITY OF ROCKFORD'S HOME-ARP ACTION PLAN FOR PUBLIC REVIEW & COMMENT

Notice is hereby given that drafts of the City of Rockford's HOME American Rescue Plan (HOME-ARP) are now on display for review and public comment. The City of Rockford (City) will hold two public hearings on Thursday, March 2, 2023. The first will be at Katie's Cup (502 7th St) at 12:00pm, and the second will be at Crusader Clinic (1200 W State St) at 5:30pm. The purpose of these public hearings is to provide an overview of the City's HOME-ARP plan draft & provide the public with an opportunity to express their ideas & views on housing needs. The draft plan will be posted prior to the hearing. Comments will be noted & responded to as we finalize our HOME-ARP Plan.

The American Rescue Plan (ARP) provides \$5 billion to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability across the country. These grant funds will be administered through HUD's HOME Investment Partnerships Program (HOME). The City of Rockford has been allocated \$3,579,012 in HOME ARP funding.

All of the draft documents are available through 5pm on Thursday, 3/9/2023. These documents may be found on the City's website [www.rockfordil.gov](http://www.rockfordil.gov) and at the following locations: City Hall Community & Economic Development Dept. (425 E State St - 2nd floor), City Health & Human Services Dept. (612 N Church St), the Rockford Housing Authority (223 S Winnebago St), and the following Rockford Public Library locations (214 N Church St, 1238 S Winnebago St, and 6685 E State St) during office hours. Should you have any difficulty accessing any of the drafts, please call 779-348-7162.

City Staff encourages residents, public agencies and other interested parties, to comment regarding all of the draft documents. Comments received by 5pm 3/9/2023 will be taken into consideration as these documents are finalized by the City. Written comments may be addressed to Sarah Brinkmann, Housing and Program Manager, Dept. of Community and Economic Development, 425 East State St, Rockford, IL 61104 or emailed to [sarah.brinkmann@rockfordil.gov](mailto:sarah.brinkmann@rockfordil.gov), faxed to (815) 967-6933, or dropped off at the Dept. of Community & Economic Development located on the 2nd Floor at City Hall (425 East State St). Si desea hablar sobre el contenido de este aviso con alguien que hable español, comuníquese con Giselle Martinez (779-348-7439) o Lucia Soria-McFarlane (779-348-7441).



The State Journal-Register | Canton Daily Ledger  
The Courier | The Register-Mail | JournalStar  
The McDonough County Voice | Star Courier  
Pontiac Daily Leader | Pekin Daily Times  
Journal-Standard | Rockford Register Star

## Order Confirmation

Not an Invoice

<b>Account Number:</b>	636693
<b>Customer Name:</b>	City Of Rockford
<b>Customer Address:</b>	City Of Rockford 425 E State ST Community Development Rockford IL 61104-1014
<b>Contact Name:</b>	City Of Rockford
<b>Contact Phone:</b>	8159875626
<b>Contact Email:</b>	
<b>PO Number:</b>	

<b>Date:</b>	02/10/2023
<b>Order Number:</b>	8450218
<b>Prepayment Amount:</b>	\$ 0.00

<b>Column Count:</b>	1.0000
<b>Line Count:</b>	107.0000
<b>Height in Inches:</b>	0.0000

### Print

Product	#Insertions	Start - End	Category
RFD Rockford Register Star	1	02/15/2023 - 02/15/2023	Govt Public Notices
RFD rrstar.com	1	02/15/2023 - 02/15/2023	Govt Public Notices

Total Order Confirmation

\$214.30

2/15/2023

**NOTICE OF AVAILABILITY OF THE CITY OF ROCKFORD'S HOME-ARP ACTION PLAN FOR PUBLIC REVIEW & COMMENT**

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The American Rescue Plan (ARP) provides \$5 billion to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability across the country. These grant funds will be administered through HUD's HOME Investment Partnerships Program (HOME).

The City of Rockford has been allocated \$3,579,012 in HOME ARP funding.

All of the draft documents will be made available Wednesday, 2/22/2023, through 5pm on Wednesday, 3/8/2023. These documents may be found on the City's website [www.rockfordil.gov](http://www.rockfordil.gov) and at the following locations: City Hall Community & Economic Development Dept. (425 E State St – 2nd floor), City Health & Human Services Dept. (612 N Church St), the Rockford Housing Authority (223 S Winnebago St), and the following Rockford Public Library locations (214 N Church St, 1238 S Winnebago St, and 6685 E State St) during office hours. Should you have any difficulty accessing any of the drafts, please call 779-348-7162.

City Staff encourages residents, public agencies and other interested parties, to comment regarding all of the draft documents. Comments received by 5pm 3/8/2023 will be taken into consideration as these documents are finalized by the City. Written comments may be addressed to Sarah Brinkmann, Housing and Program Manager, Dept. of Community and Economic Development, 425 East State St, Rockford, IL 61104 or emailed to [sarah.brinkmann@rockfordil.gov](mailto:sarah.brinkmann@rockfordil.gov), faxed to (815) 967-6933, or dropped off at the Dept. of Community & Economic Development located on the 2nd Floor at City Hall (425 East State St).

Si desea hablar sobre el contenido de este aviso con alguien que hable español, comuníquese con Giselle Martinez (779-348-7439) o Lucia Soria-McFarlane (779-348-7441).

# PUBLIC HEARINGS

## HOME AMERICAN RESCUE PLAN

### CITY OF ROCKFORD

### COMMUNITY & ECONOMIC DEVELOPMENT



779-348-7162



NDHousing  
@rockfordil  
.gov

The City of Rockford received \$3,579,012 in HOME-ARP funding, and has released a draft plan allocating those funds. The purpose of these hearings is to present an overview to the public and provide an opportunity to express their ideas & views on housing needs.

#### 1st Hearing:

Katie's Cup | 502 7<sup>th</sup> St

12:00pm

#### 2nd Hearing:

Crusader Clinic | 1200 W  
State St

5:30pm



**Espanol:** 779-348-7439

or 779-348-7441

**Need Accomodations?**

Call 779-348-7442





## AGENDA

ROCKFORD COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT  
**PUBLIC HEARING: PROPOSED HOME-ARP ALLOCATION PLAN & AMENDED ACTION PLAN 2021**

Katie's Cup  
March 2, 2023  
12:00 P.M.

- I. Welcome and Introductions
- II. Purpose of the Public Hearing
- III. HOME-ARP Grant Overview
- I. Community Needs
- II. HOME-ARP Allocation Plan Overview
- III. Proposed Funding Allocations
- IV. Public Comments Forum
- V. Adjournment

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## MEETING MINUTES

### ROCKFORD COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT **PUBLIC HEARING: PROPOSED HOME-ARP ALLOCATION PLAN & AMENDED ACTION PLAN 2021**

Katie's Cup Denver Bitner Room  
March 2, 2023  
12:00 P.M.

- I. Welcome and Introductions**
- II. Purpose of the Public Hearing**
- III. HOME-ARP Grant Overview**
- IV. Community Needs**
- V. HOME-ARP Allocation Plan Overview**
- VI. Proposed Funding Allocations**
- VII. Questions & Answers**
  - a. Why is no money allocated to the non-congregate shelter when the needs identified a need for more non-congregate shelter units?
    - i. The amount of funding available is insufficient to address that need, and the city has identified preferences for other qualifying populations. Other funding will be utilized to support current shelter options.
  - b. Will any funding be allocated to crisis services for those that cannot go to current shelters, such as members of the LGBTQ community?
    - i. They will be considered with other clients as long as they meet the criteria for funding.
  - c. Will supportive services funds go to other agencies that provide services? Will all money go directly to Remedies?
    - i. Yes, the city will do an application cycle or open RFP for agencies to apply.
  - d. Has a funding source been identified for long-term maintenance of the newly developed rental units?
    - i. No, that is going to be phase two, where the city seeks technical assistance on how to address long-term compliance.
  - e. How many units will \$2 million produce? What is the timeline for implementation?
    - i. Current plans propose 20 units. The city was very conservative in its estimates and hope to be able to produce more by layering with other funding. The plan is due by the end of March, and the city has until 2030 to complete the project.
  - f. Does TBRA also include utility assistance?
    - i. Yes, it can, but it depends on how the agency administers its program.
  - g. What does the rental housing funding look like as far as implementation goes?

- i. Development of new rental units. Will be able to identify a more detailed plan once proposals are submitted.

## **VIII. Public Comments Forum**

- h. Remedies is only designed to serve women and children, but several families don't meet the criteria because they have male children.
- i. Please do not give Rockford Rescue Mission any more funding. They do not follow HUD's regulations in serving anyone who meets the criteria; they turn away people that don't believe in Jesus.
- j. Rockford needs to create something that doesn't exist. They need an unbiased shelter to serve all community members.
- k. It's tough to serve people in the community without options.
- l. Equitable Social Solutions in Madison. Has a hotel to housing program.
- m. Current shelter options do not allow families to stay together. Men have to go to separate areas from wife and female children. If the male child is of a certain age, they can't remain with the mother.
- n. LIAM foundation (LGBTQ) feels the agency is always overlooked and underfunded. The city needs to put more funding towards the issue and concern for other community members. The agency provided service to over 156 clients last year.

## **IX. Next Steps**

## **X. Adjournment**

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12:00pm @ Katie's Cup

Name	Address	Phone	Email	How did you hear about this event?
Josh Zimmerman	715 W State St	720 829 1928	Josh.Zimmerman@rockfordrescuewars.org	<input type="checkbox"/> Rockford Register Star <input type="checkbox"/> Social Media <input type="checkbox"/> Flyer <input checked="" type="checkbox"/> Email <input type="checkbox"/> Referral <input type="checkbox"/> Other:
Phyllis Gallisath	124 N. Water St Rockford, IL	815-319-1956	executive director@the-liamfoundation.org	<input type="checkbox"/> Rockford Register Star <input checked="" type="checkbox"/> Social Media <input type="checkbox"/> Flyer <input type="checkbox"/> Email <input type="checkbox"/> Referral <input type="checkbox"/> Other:
Michael O'Connor	1149 Railroad, Rockford, IL	779-210-2878	mikeo@carpentersplace.org	<input type="checkbox"/> Rockford Register Star <input type="checkbox"/> Social Media <input type="checkbox"/> Flyer <input checked="" type="checkbox"/> Email <input type="checkbox"/> Referral <input type="checkbox"/> Other:
Veronica morales	<del>903 Broadway</del> Rockford, IL 61109 612 N Church St	779-348-7578	veronica.morales.amedonra@rockford.il.gov	<input type="checkbox"/> Rockford Register Star <input type="checkbox"/> Social Media <input type="checkbox"/> Flyer <input checked="" type="checkbox"/> Email <input type="checkbox"/> Referral <input type="checkbox"/> Other:

12:00pm @ Katie's Cup

Name	Address	Phone	Email	How did you hear about this event?
Joyce Williams	2243 S. 4th St			<input type="checkbox"/> Rockford Register Star <input type="checkbox"/> Social Media <input type="checkbox"/> Flyer <input type="checkbox"/> Email <input type="checkbox"/> Referral <input checked="" type="checkbox"/> Other: Northern IL Coc
Crystal Walker	1149 Railroad Ave - 61104		Crystal@we.carpentersplace.org	<input type="checkbox"/> Rockford Register Star <input type="checkbox"/> Social Media <input type="checkbox"/> Flyer <input type="checkbox"/> Email <input type="checkbox"/> Referral <input checked="" type="checkbox"/> Other: Coc
Tom Sandquist	120 W. State RFD			<input type="checkbox"/> Rockford Register Star <input type="checkbox"/> Social Media <input checked="" type="checkbox"/> Flyer <input checked="" type="checkbox"/> Email <input type="checkbox"/> Referral <input type="checkbox"/> Other:
Eric Dykstra	715 W State Rockford		eric.dykstra@rockfordrescuemission.org	<input type="checkbox"/> Rockford Register Star <input type="checkbox"/> Social Media <input type="checkbox"/> Flyer <input type="checkbox"/> Email <input checked="" type="checkbox"/> Referral <input type="checkbox"/> Other:

12:00pm @ Katie's Cup

Name	Address	Phone	Email	How did you hear about this event?
ELIN VORE	223 N. Winnebago St.	(815) 489-8600	Evore@rockfordhaag	<input type="checkbox"/> Rockford Register Star <input type="checkbox"/> Social Media <input type="checkbox"/> Flyer <input type="checkbox"/> Email <input checked="" type="checkbox"/> Referral <input checked="" type="checkbox"/> Other:
				<input type="checkbox"/> Rockford Register Star <input type="checkbox"/> Social Media <input type="checkbox"/> Flyer <input type="checkbox"/> Email <input type="checkbox"/> Referral <input type="checkbox"/> Other:
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				<input type="checkbox"/> Rockford Register Star <input type="checkbox"/> Social Media <input type="checkbox"/> Flyer <input type="checkbox"/> Email <input type="checkbox"/> Referral <input type="checkbox"/> Other:

12:00pm @ Katie's Cup

Name	Address	Phone	Email	How did you hear about this event?
Neel Erickson		815.543.7147	nerickson@illinoisrealtors.org	<input type="checkbox"/> Rockford Register Star <input type="checkbox"/> Social Media <input type="checkbox"/> Flyer <input checked="" type="checkbox"/> Email <input type="checkbox"/> Referral <input type="checkbox"/> Other:
				<input type="checkbox"/> Rockford Register Star <input type="checkbox"/> Social Media <input type="checkbox"/> Flyer <input type="checkbox"/> Email <input type="checkbox"/> Referral <input type="checkbox"/> Other:
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				<input type="checkbox"/> Rockford Register Star <input type="checkbox"/> Social Media <input type="checkbox"/> Flyer <input type="checkbox"/> Email <input type="checkbox"/> Referral <input type="checkbox"/> Other:



## **AGENDA**

**ROCKFORD COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT**  
**PUBLIC HEARING: PROPOSED HOME-ARP ALLOCATION PLAN & AMENDED ACTION PLAN 2021**

Crusaders Clinic Community Room  
March 2, 2023  
05:30 P.M.

- I. Welcome and Introductions**
- II. Purpose of the Public Hearing**
- III. HOME-ARP Grant Overview**
- IV. Community Needs**
- V. HOME-ARP Allocation Plan Overview**
- VI. Proposed Funding Allocations**
- VII. Questions & Answers**
- VIII. Public Comments Forum**
- IX. Next Steps**
- X. Adjournment**

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## **MEETING MINUTES**

### **ROCKFORD COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT PUBLIC HEARING: PROPOSED HOME-ARP ALLOCATION PLAN & AMENDED ACTION PLAN 2021**

Crusaders Clinic Community Room  
March 2, 2023  
05:30 P.M.

**I. Welcome and Introductions**

**II. Purpose of the Public Hearing**

**III. HOME-ARP Grant Overview**

**IV. HOME-ARP Allocation Plan Overview**

**V. Community Needs**

**VI. Proposed Funding Allocations**

**VII. Questions & Answers**

- a. What does over \$ 2 million for rental housing mean?
  - i. The city is proposing to create approximately 20 new housing units. The City is giving preference to victims fleeing domestic violence or accompanied youth.
- b. When you say affordable, is it public housing?
  - i. No, units will not be owned by Housing Authority. They can connect through the Housing Authority for assistance.
- c. Is there an identified area for the 20 units?
  - i. No, it's still in the planning phase. Once the plan is approved, the city will open an RFP to solicit proposals.

**VIII. Public Comments Forum**

- a. Important for residents in the community to be a part of moving things in new and positive directions. Want more efforts to be made by the leaders to include current residents in the planning and development process of new projects. Citizens must take up responsibility for the direction of their community. If they are not engaged, they will be on the downside of the redevelopment of this area.

**IX. Next Steps**



## **X. Adjournment**

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5:30pm @ Crusader Clinic

Name	Address	Phone	Email	How did you hear about this event?
VICTORY BELL	2597 MEADOW VIEW LN	815-963-1075	VB1516 @ AOL.co	<input type="checkbox"/> Rockford Register Star <input type="checkbox"/> Social Media <input type="checkbox"/> Flyer <input type="checkbox"/> Email LITY <input type="checkbox"/> Referral <input type="checkbox"/> Other:
				<input type="checkbox"/> Rockford Register Star <input type="checkbox"/> Social Media <input type="checkbox"/> Flyer <input type="checkbox"/> Email <input type="checkbox"/> Referral <input type="checkbox"/> Other:
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				<input type="checkbox"/> Rockford Register Star <input type="checkbox"/> Social Media <input type="checkbox"/> Flyer <input type="checkbox"/> Email <input type="checkbox"/> Referral <input type="checkbox"/> Other:



# Proposed HOME-ARP Allocation Plan Public Hearing

Wednesday, March 2, 2023  
12:00pm & 5:30pm



# HOUSEKEEPING



- Please mute your cell phone until the end of the presentation.
- Please hold all questions or comments until the end of the presentation.
- Please raise your hand to be acknowledged to speak during the public comment session.
- Please exit the room if you need to take a call or briefly leave the presentation.

# AGENDA

- I. Welcome and Introductions
- II. Purpose for the Public Hearing
- II. HOME-ARP Grant Program Overview
- III. Plan Overview
- III. Proposed Funding Public Comments
- III. Next Steps
- VI. Adjournment





# MEET THE CONSULTANTS



**ERYCA FAMBRO**  
**Director of Consulting**

Eryca joined WFN in 2010 as a Planning Specialist and has served as Deputy Director and Director of two large entitlement recipients receiving funding through HUD. Eryca now serves as the Director of Consulting for WFN, providing expert analysis, engagement, and technical assistance to communities nationwide. Eryca holds an MBA in Project Management from the University of Phoenix and a BS from Georgia State University.



**LASHONDRA WELLS**  
**Project Consultant**

LaShondra joined WFN in 2015 and has served as Grant Accountant and Deputy Director for a large urban entitlement community receiving funding through HUD. LaShondra now serves as a Project Consultant providing expert analysis, technical assistance, and program development. LaShondra has an ABA from Delgado Community College in New Orleans, Louisiana.



# PURPOSE

- To inform the public of the proposed activities recommended for HOME-ARP grant funding;
- To receive citizen input on the proposed recommendations and include them in the development of the HOME-ARP Allocation Plan;

# HOME ARP GRANT OVERVIEW

The American Rescue Plan (ARP) provided grant funds through HUD's HOME Investment Partnerships Program (HOME) to the City of Rockford to reduce homelessness and increase housing stability throughout the city.

*The grant requires the City to assist individuals or households who are:*

- Homeless;
- At risk of homelessness;
- Fleeing or Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking;
- Other vulnerable populations with the greatest risk of instability;

OR

- Veterans and families that include a veteran family member that meet the criteria in one of the above.







# ALLOCATION PLAN OVERVIEW

- As a recipient of HOME-ARP grant funds, the City of Rockford is required to submit a HOME-ARP Allocation Plan to HUD.
- The HOME-ARP Allocation Plan describes how the City of Rockford intends to distribute its HOME-ARP funds, including how it will use these funds to address the needs of HOME-ARP qualifying populations.
- The City of Rockford must submit the Plan to HUD as a substantial amendment to its Fiscal Year 2021 Annual Action Plan.

# Community Needs

- Quality, affordable units for families of all sizes and income ranges.
- More non-congregate units, especially for those fleeing domestic violence and with severe mental health issues.
- Inclusive Shelter Options
- Supportive Services



# Administrative Needs

- Staffing for shelters and service provider agencies.
- Faster response time with assistance payments.
- Improved relationship with property owners, tenants, and service providers.
- Review of City policies to ensure support of housing stability.



# City of Rockford Priorities by Qualifying Population

## Homeless

- Inclusive shelter space to accommodate all family compositions and lifestyles
- Shelter staff to increase shelter capacity. Shelter is operating at 53% capacity.
- Case Management

## Fleeing or Attempting to Flee

- Immediate access to safe and stable shelter
- Intensive counseling and advocacy
- Job training and placement
- Legal Assistance

## At Risk of Homelessness

- Affordable housing units
- Supportive services to prevent homelessness
- Financial literacy, credit counseling, and job training

## At Greatest Risk of Instability

- Affordable housing units
- Extensive supportive services to address root causes of instability

# HOME-ARP FUNDING ALLOCATIONS

The City of Rockford was awarded \$3,579,012.00.

Administration	\$536,851.00
Non-Congregate Shelter	\$0.00
Rental Housing	\$2,042,161.00
Supportive Services	\$700,000.00
Tenant-Based Rental Assistance	\$300,000.00



# PUBLIC COMMENTS

- Any party who wishes to speak about the proposed activities recommended for HOME-ARP grant funding and/or their Community Need is encouraged to do so at this time. Each person is allotted two minutes to speak.
- All public comments will be provided to the Rockford City Council to consider before their approval of the Proposed HOME-ARP Allocation Plan on March 20, 2023, and will be included in the submission to HUD.
- All written comments must be received at the office by **5:00 P.M. on Thursday, March 9, 2023**, via mail, email, or hand delivery to:

Attn: Sarah Brinkmann, Housing & Program Manager  
Rockford Community & Economic Development Department  
425 E. State Street; Rockford, IL 61104  
Telephone: 779-348-7162; Email: [Sarah.Brinkmann@rockfordil.gov](mailto:Sarah.Brinkmann@rockfordil.gov)





# NEXT STEPS

- Public Comment Period is *February 23, 2023-March 9, 2023*
- The Rockford City Council will approve recommendations on **March 20, 2023.**
- Allocation Plan will be submitted to HUD for review and approval by **March 30, 2023.**
- Funding applications will be released once HUD approves the Allocation Plan.