City of Bloomington Community Development Block Grant (CDBG) Annual Action Plan Program Year 42



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Executive Summary

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

1. Introduction

The City of Bloomington, Community Development Division, is the lead agency responsible for implementing the 2015-2019 Consolidated Plan and all annual Action Plans submitted under the five-year plan. Community Development staff has been responsible for managing the City's housing and community development efforts for more than 40 years. This Action Plan outlines programs to be funded under the Program Year 42 (PY42) Community Development Block Grant (CDBG). Program Year 41 has been amazingly successful considering the multitude of changes that have occurred in staffing new Grants Coordinator, new Rehab Specialist, new Support Staff IV and a new Division Manager. Currently, the program is on target to meet all goals and objectives for the year. In addition to the projects outlined in this Action Plan, several program implementation upgrades are planned for Program Year 42.

Bloomington is considered a twin-city to the Town of Normal as the two are directly adjacent. This provides for a more diverse and well-balanced economy. In addition to manufacturing and industrial business, the twin-cities are home to two universities, two community colleges, two hospitals, a convention center, one indoor mall, one open air mall and a vast network of banks, Savings and Loan Associations and credit unions. Recently, the communities received notice that one of its largest employers, Mitsubishi Manufacturing North America (MMNA), would be closing its doors. It is unsure at this time the impact this closure will have on the area's economy but it's expected to be quite significant. The majority of MMNA employees were laid off effective November 2015. The facility will close for good in May 2016. Many manufacturing businesses located in the twin-cities support MMNA by producing parts such as windows and passenger seats for the plant. For many of these businesses, MMNA is their primary customer so the plant closure is forcing them to close their doors as well. In total, more than 1200 jobs are will be lost to the closure. To compound the situation, it was announced in January that the local office for the Illinois Department of Employment Security (IDES) will be permanently closed, requiring those seeking employment to travel to another community to receive assistance with their unemployment benefits.

Geographically, the City of Bloomington encompasses 27.22 square miles of land area within McLean County, the largest county in Illinois. Census data from 2014 estimates Bloomington's population at 76,730 or 45.2% of the total population for all of McLean County. Bloomington is located at the intersection of interstates 39, 55 and 74. Just a few hours from Chicago, Indianapolis and St. Louis, Bloomington is serviced by two major railroad lines and Amtrak as well as air transportation at the

Central Illinois Regional Airport (CIRA), one of the fastest growing airports in the country. CIRA offers flight service for commuter, corporate and private aircraft.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Please refer to Section AP-20 Annual Goals and Objectives for an overview of the goals and objectives to be met during Program Year 42.

3. **Evaluation of past performance**

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

The City is currently in its 41st year of community development programming through the Community Development Block Grant (CDBG). With rare exception, the City has met or exceeded program goals and objectives set forth in the various 5-Year Consolidated Plans and annual Action Plans submitted to the US Dept. of Housing and Urban Development (HUD). Throughout the years, the City has leveraged CDBG, City General Funds and other sources of funding to meet the needs of the community while adhering to HUD regulations - balancing funding between single-family, owner-occupied rehabilitation, demolition of abandoned/condemned properties, infrastructure projects, public service projects and administration costs. A sampling of the City's successful endeavors are outlined below:

- Partnership with the West Bloomington Revitalization Project (WBRP) since 2008 providing nearly \$50,000 in financial support for the Tool Library, Façade Program, community garden and other programs benefitting the Westside.
- The Grants Coordinator represents the City on the West Bloomington Housing Collaborative, which supports Mid Central Community Action's \$1.5 million grant from the Illinois Attorney General (IAG). The City contributes through demolition and clearance of vacant, dilapidated homes. Lots are donated to Habitat for Humanity for new construction.
- The City operates a Rehabilitation Program which provides 0% interest deferred loans for moderate rehabilitation on homes to homeowners with low and moderate income. The program also provides funding for emergency water and sewer repairs. Typically, 15-25 projects are completed through this program annually. The City currently has approximately \$1.8 million in active loans to homeowners.
- Partnerships with both YouthBuild and Habitat for Humanity play a vital role in the City's efforts to increase the affordable housing stock. Rehab-eligible properties are generally donated to Annual Action Plan

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YouthBuild of McLean County and CDBG funds are dedicated to support the project. When demolition is necessary, the lots are cleared and prepared for new construction then donated to either YouthBuild or Habitat. The City typically donates 1-2 properties a year to YouthBuild and 5-7 to Habitat.

- The City dedicates CDBG funds to infrastructure projects in low and moderate income areas nearly every year. Past projects have provided new curb and gutter, street replacement and sewer and water improvements.
- The City supports PATH (Providing Assistance to Help) annually by providing funding for its Emergency Services Grant program. This program helps prevent homelessness by assisting low and moderate income individuals and families with emergency rent assistance and utility and/or moving expenses. Funds are provided directly to the provider and cannot exceed 3 months of assistance. The City also partially funds 2 FTE positions at PATH, a Homeless Outreach Worker and Housing Benefits Specialist.
- The City has administered the Rental Registration and Inspection program, funded with City General funds, since 2008. By cross-training that program's staff with other code enforcement officers, the City's rental stock has improved greatly.
- The City has been successful in obtaining several Illinois Housing Development Authority (IHDA) grants in recent years. The grants have leveraged CDBG funds for both rehabilitation and demolition projections.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The City has followed the Citizen Participation Plan in developing this PY42 Annual Action Plan. Notice that the Plan was available for public/review comment was distributed through the local newspaper, Path-O-Gram, the Bloomington Housing Authority, City website, local churches, social service agencies and the Bloomington Public Library. Many of these organizations provide service for non-English speaking and disabled citizens. Copies of the Plan were made available at the Bloomington Public Library, City Hall/City Clerk's office and Planning and Code Enforcement for the minimum 30-day comment period which began January 22, 2016 and ended at COB on February 29, 2016. A public hearing was conducted at the City Council meeting on February 22, 2016. A summary of comments

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received is below. A copy of the full Citizen Participation Plan is provided as an attachment to this document.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Three individuals spoke at the public hearing on February 22, 2016. All addressed the City Council and encouraged them to approve the Plan for submission. See AP-10 Consultation for a list of individuals.

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

Not applicable. All comments were accepted.

7. Summary

The few responses received regarding this Plan were all positive. Each individual who spoke at the public hearing represented an agency identified as a potential recipient of funding. All spoke of their own volition.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

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

Agency Role	Name		Department/Agency	
CDBG Administrator	BLOOMINGTON	Con	nmunity Development Department	

Table 1 – Responsible Agencies

Narrative (optional)

The City of Bloomington's Community Development Division administers the Community Development Block Grant (CDBG). The Grants Coordinator, housed in this division, is responsible for submitting the Consolidated Plan, Action Plan, Consolidated Annual Performance Evaluation Report (CAPER), Environmental Review Record and other required reports. Additionally, the Grants Coordinator is responsible for overall financial monitoring of grant funds, sub-recipient monitoring and community outreach and involvement. The division also houses an Inspection III/Rehabilitation Specialist and part-time support staff position. The Rehabilitation Specialists coordinates rehabilitation projects for low and moderate income households. Duties include preparing environmental review documents for Tier 2 projects, conducting initial home inspections, coordinating the project bidding process, awarding contracts, preparing loan documents and conducing final inspections. Support staff duties include entering bills for payment, accepting loan applications, setting up homeowner files and accepting loan payments. The Code Enforcement Division Manager provides support to the program by providing general program oversight, assisting with Tier 2 environmental reviews and approving vouchers in IDIS for payment.

Consolidated Plan Public Contact Information

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AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

In 2014, United Way of McLean County conducted a community needs assessment. This assessment utilized a variety of tools including direct mail surveys, focus groups, key informant interviews and secondary data collection. The 2014 Community Assessment was heavily utilized to prepare the 2015-2019 Consolidated Plan, which was consulted frequently throughout the development of this Action Plan.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The City participates on several committees comprised of housing providers, lenders, healthcare professionals, not-for-profit organizations and social service agencies. Involvement allows staff to keep apprised of community needs and consult providers on issues their clients face on a regular basis. It also provides City staff with information on local programs and services available to its own program beneficiaries. One example of collaboration is the League of Women Voter's Affordable Housing Work Group. This group dedicated the better part of 2015 to researching issues surrounding the lack of adequate affordable housing in area. In the fall of 2015, the findings were formulated into a Consensus Statement and presented to the League of Women Voters membership which was accepted and approved, moving the process to the next stage of action. Members of the working group represented a wide variety of social service agencies representing all types of low income populations, local government, universities, realtors, and the League of Women Voters. Many of the same will continue the process as it moves to the action phase.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City serves as the fiscal agency for six McLean County Continuum of Care (COC) grants. PATH (Providing Access to Help) serves as the lead coordinating agency for the both the McLean County COC and the Central Illinois COC. The City's Grants Coordinator regularly attends COC meetings and participates in COC agencies' programs and activities. Currently, the Grants Coordinator is serving on a working group to explore tiny homes as an option for housing the chronically homeless in Bloomington specifically those living in "tent city".

The City supports PATH's Homeless Prevention Program in several ways. CDBG funds are provided to support two FTE positions - the Housing and Benefits Specialist and Homeless Outreach Worker. Additional funds are provided to support the Emergency Services Grant Program. This

program can provide assistance to low and moderate income households at imminent risk of becoming homeless. Payments for rent and utility assistance and emergency home repairs are made directly to the provider. The program also provides clean-up assistance to households facing eviction/home condemnation due to hoarding concerns.

The McLean County COC seeks to house families within (30) days of becoming homeless. Currently, the outreach plan for all agencies in the COC is to connect households with dependent children to appropriate shelter. A case manager works with the families to start the rapid rehousing process as soon as possible. Funds are available for housing deposits and first month rent. The Central Illinois COC has two agencies that work specifically with the homeless youth population, Project Oz in Bloomington and Garden of Prayer in Kankakee. Many other agencies work with homeless families that include youth members. Project Oz has two programs that target homeless youth: the Street Outreach Program and the Transitional Living Program (TLP)/Maternity Group Home (MGH). The Street Outreach Program serves homeless youth ages 17-21 and provides only outreach services. The Transitional Living Program serves the same age range and provides (16) beds including a semi-supervised apartment and several scattered sites. MGH is specifically for pregnant and parenting young women and includes a life-skills component. TLP is for both single males and females and includes life-skill development. Garden of Prayer Youth Center has a group home that provides housing for 8-10 youth ages 15-18. It provides an after-school/out-of-school program that offers counseling, mentoring, tutoring and parenting classes. Nine weeks of summer camp is provided to low-income families and children residing at the Salvation Army and job-readiness classes are provided for teens.

Home Sweet Home Mission, a Bloomington homeless shelter, maintains several beds in an area specifically designated for veterans. The Salvation Army provides a staff person to handle Veteran Affairs for its clients. The nearest Veteran Affairs (VA) hospital is located in Danville, approximately 1 hour from Bloomington. Crosspoint, also located in Danville, serves individuals who are unable to use the (VA) services. The COC regularly consults with the HUD-Veteran Affairs Supportive Housing (VASH) counselors and Supportive Services for Veteran Families (SSVF) counselors within the local Continuum to ensure veterans are receiving their benefits.

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

The COC consults with Emergency Shelter Grant (ESG) recipients to ensure that the budgets of all recipients are in alignment with funding requirements. All ESG recipients submit their annual application to the COC for approval. The applications are then ranked according to how well they have met the goals of the COC Strategic Plan. The COC evaluates the merit of new proposals based on a

preference for rapid rehousing. Under-performing organizations will not receive recommendation from the COC for funding. The recipients' performances are reviewed through the project monitoring process during which progress towards goals is evaluated. The City is responsible for monitoring each project's financial documentation to ensure all federal guidelines are being followed.

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

Table 2 – Agencies, groups, organizations who participated

Agency/Group/Organization	PATH
Agency/Group/Organization Type	Services - Housing
	Services-Children
	Services-Elderly Persons
	Services-Persons with Disabilities
	Services-Persons with HIV/AIDS
	Services-Victims of Domestic Violence
	Services-homeless
	Services-Health
	Services-Education
	Services-Employment
	Service-Fair Housing
	Services - Victims
	211
What section of the Plan was addressed by	Homeless Needs - Chronically homeless
Consultation?	Homeless Needs - Families with children
	Homelessness Needs - Veterans
	Homelessness Needs - Unaccompanied youth
	Homelessness Strategy
	Non-Homeless Special Needs
Briefly describe how the Agency/Group/Organization	As lead organization for both the Central Illinois Continuum of Care and the
was consulted. What are the anticipated outcomes of	McLean County Continuum of Care, PATH is the agency most informed on the
the consultation or areas for improved coordination?	homeless issues, needs and services within the community. PATH was consulted
	to identify any gaps in service that could be closed with CDBG assistance. PATH
	indicated that the City's role is sufficient at this time but will remain in regular
	contact and notify the Grants Coordinator if other needs arise.

2	Agency/Group/Organization	BLOOMINGTON HOUSING AUTHORITY			
	Agency/Group/Organization Type	РНА			
	What section of the Plan was addressed by Consultation?	Public Housing Needs			
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	A discussion of Bloomington Housing Authority's needs was held prior to the development of this Action Plan.			
3	Agency/Group/Organization	WEST BLOOMINGTON REVITALIZATION PROJECT			
	Agency/Group/Organization Type	Housing Neighborhood Organization			
	What section of the Plan was addressed by Consultation?	Neighborhood Revitalization			
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	City staff work closely with WBRP on several ongoing projects. WBRP member are able to provide input on City programs such as the Home Rehabilitation Program and the City, in return, provides input on WBRP programs. This partnership will continue throughout the period covered by this Action Plan, allowing for open, on-going discussion on how to move the revitalization effort in West Bloomington forward.			

Agency/Group/Organization	MID CENTRAL COMMUNITY ACTION, INC.
Agency/Group/Organization Type	Housing
	Services - Housing
	Services-Elderly Persons
	Services-Victims of Domestic Violence
	Services-homeless
	Services-Education
	Services-Employment
	Service-Fair Housing
	Services - Victims
What section of the Plan was addressed by	Housing Need Assessment
Consultation?	Neighborhood Revitalization
Briefly describe how the Agency/Group/Organization	City staff work very closely with Mid Central Community Action staff on several
was consulted. What are the anticipated outcomes of	on-going projects related to neighborhood revitalization and housing issues.
the consultation or areas for improved coordination?	Program consultation is an on-going relationship between the two organizations.
	Both organizations seek ways to improve coordination of local housing programs
	so that collaboration continues to be the norm and agency dollars are leveraged
	to make the greatest impact on the community.

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

No agency types were purposefully not consulted during the development of this Plan. See the 2015-2019 ConPlan - Section PR-10 Consultation for a complete listing of agencies that participated in Consolidated Plan development.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?			
Continuum of Care	PATH	The Continuum of Care works to support homeless individuals to self-sufficiency. These			
Continuum of Care	PAIN	goals closely align with this Plan's housing goals.			
Comprehensive Plan	Bloomington	CDPG has goals aligning with PHA and HIID's housing goals for the community			
Comprehensive Flan	Housing Authority	CDBG has goals aligning with BHA and HUD's housing goals for the community.			
West Bloomington	City of Bloomington	Goals of the Neighborhood Plan closely align with those of this Plan. The Neighborhood			
Neighborhood Plan	City of Bioonnington	Plan prioritizes safety, housing, youth, education and economic development.			
City of Bloomington	City of Bloomington	The Comprehensive Plan, adopted August 2015, identifies West Bloomington as a			
Comprehensive Plan	City of Biodiffington	Regeneration Area, supporting this Plan's focus on West Bloomington for its programs.			
2014 Community	United Way of	The 2014 Community Assessment was one of the major sources of data for the			
Assessment	McLean County	development of the 2015-2019 Comprehensive Plan. The goals outlined in the			
Assessificit	ivictean County	Consolidated Plan are carried throughout this Action Plan.			

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

Evaluation of performance is a process that must be ongoing, thus the consultation process will continue throughout the grant cycle represented through this Action Plan. Information gathered and lessons learned during the entire year will be utilized continually to make improvements in the program so that it can be implemented in a manner that best serves the community.

AP-12 Participation – 91.105, 91.200(c)

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

The City has followed its Citizen Participation Plan during the creation of this Action Plan. The Citizen Participation Plan requires the Action Plan be available for public review and comment for a minimum of 30 days. Copies of the Action Plan were made available to the public beginning January 22, 2016 at the following locations:

- City of Bloomington, Community Development, 115 E. Washington St., Bloomington
- Bloomington Public Library, 205 E. Olive St., Bloomington
- Bloomington City Hall/City Clerk's Office 109 E. Olive St., Bloomington
- City of Bloomington website, http://www.cityblm.org

Notice of the Action Plan's availability was published in the Pantagraph on January 21, 2016 and in the Path-O- Gram on January 25th, February 8th and February 22nd. A Notice of Availability was provided to the Bloomington Housing Authority for publication in its resident newsletter and for posting in the administration office. A letter providing notice was mailed to churches and neighborhood associations in the City's designated low and moderate income areas as well as emailed to program partners and other social service providers. Notice of the availability of the Plan and the public hearing were posted in the Government Center's lobby and outside of City Hall.

A public hearing was held during the City Council meeting on February, 22, 2016. The public comment period officially ended at COB on February 29, 2016.

Citizen Participation Outreach

Sort Or	Mode of Outre	Target of Outr	Summary of	Summary of	Summary of com	URL (If applicable)
der	ach	each	response/atten	comments rec	ments not	
			dance	eived	accepted	
					and reasons	

1	Public Meeting	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non- targeted/broa d community Residents of Public and Assisted Housing Whole	The public meeting was held during the February 22, 2016 City Council meeting. Approximately 75 people were in attendance. Only those who spoke were required to sign-in. See Appendix for a copy of the sign-in sheet.	Mike O'Donnell (WBRP) spoke in favor or the Action Plan as did Cathy Sprague (Heartland Heart Start) and Robert Bosquez (WBRP Tool Library). Mr. Bosquez addressed the partnership with Connect Transit specifically stating that they were very excited to be able to move forward with	Not applicable	https://www.youtube.com/watch?v=7 XIQ_MHaASc
			sign-in sheet.			

Sort Or der	Mode of Outre ach	Target of Outr each	Summary of response/atten dance	Summary of comments rec eived	Summary of com ments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	Non- targeted/broa d community	No response.	Not applicable	Not applicable.	
3	Internet Outreach	Non- targeted/broa d community	No response.	Not applicable.	Not applicable.	
4	Electronic Newsletter	Social Service Agencies	No response.	Not applicable.	Not applicable.	
5	Flyer/Announce ment	Residents of Public and Assisted Housing	No response.	Not applicable.	Not applicable.	
6	Direct Mailing to Churches and Social Service Agencies for posting	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities	No response.	Not applicable.	Not applicable.	

Sort Or der	Mode of Outre ach	Target of Outr each	Summary of response/atten dance	Summary of comments rec eived	Summary of com ments not accepted and reasons	URL (If applicable)
7	Professional Meetings	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Announcements of the availability of the PY42 Action Plan for public review and comments was made at 6 professional meetings reaching approximately 100 university staff, social service providers, health care providers and others.	No response.	Not applicable.	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City will utilize CDBG, Program Income, City General Funds and other grant sources of funding to support its programs during this Action Plan. In recent years, the City has received funding from the Illinois Housing Development Authority's (IHDA) Single-family Owner-Occupied Rehabilitation (SFOOR) and Abandoned Property Program (APP) grants, leveraging CDBG funds for home rehabilitation and demolition activities. The City is a partner in the West Bloomington Housing Collaborative which provides additional funds for home rehabilitation in West Bloomington.

Anticipated Resources

Program	Source of	Uses of Funds	Expe	cted Amoun	t Available Yea	ar 1	Expected	Narrative Description
	Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	540,544	45,500	139,262	725,306	1,495,404	Amount Expected for the Remainder of the Con Plan is based on the Year One estimate minus the Year Two estimate.

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Table 5 - Expected Resources - Priority Table

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

The City serves as the fiscal agent for six McLean County Continuum of Care (COC) grants. The COC provides a coordinated effort to assist individuals and families at risk of becoming homeless or currently experiencing homelessness. COC agencies provide a wealth of services including but not limited to case management, child care, health care, food and shelter, supportive housing, counseling and spiritual care. Each agency that receives COC funding from the City leverages those dollars with their own funds as well as other private, state and federal resources to ensure the needs of the homeless population are being met. The COC grant provides funding for supportive services and/or administration for six of the member agencies of the McLean County COC. Each grant requires a minimum 20% match. The City uses CDBG funds to assist PATH in reaching their matching requirement. The McLean County COC has approximately 50 member agencies.

The Grants Coordinator represents the City on the West Bloomington Housing Collaborative (WBHC). The WBHC was formed as a requirement of a \$1.5 million grant Mid Central Community Action (MCCA) received from the Illinois Attorney General's (IAG) Office. The grant focuses primarily on revitalization opportunities on the City's Westside. The grant provides funding for the rehabilitation of vacant and/or foreclosed properties, minor rehabilitation on owner-occupied homes, new construction of Habitat Homes and community engagement opportunities in the City's designated slum/blight area. The City is utilizing CDBG funds to support the project through the demolition of dilapidated properties. One property will be donated to the West Bloomington Revitalization Project for a community flower garden. A second has been donated to Jesus House, a local not-for-profit, for use as green space. The City will donate a total of 3 additional properties for this project to Habitat for Humanity for construction of affordable housing. In total, the project anticipates rehabbing a total of 9-12 abandoned/foreclosed homes for resale, building three new Habitat homes and providing exterior repairs for approximately 21 homeowners.

The City is currently partnering with MCCA and the West Bloomington Revitalization Project (WBRP) on a NeighborWorks Expansion Grant. The grant provides MCCA with \$100,000 in funding for roof replacement on the Westside. Beneficiaries of the roof replacements were selected from the City's Rehabilitation Loan Program's waiting list. WBRP is providing additional assistance to the homeowners on other home improvements such as window and gutter replacements, sidewalks and exterior repairs utilizing CDBG and other funding sources. The project will assist seven homeowners by September 30, 2016.

July 2016 will bring an end to round one of the Illinois Housing Development Authority's Abandoned Property Program (IHDA APP). The City

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received more than \$50,000 in funding in round one. The funds were utilized to completely fund one demolition project and partially fund three additional projects. It is uncertain at this time if round two funding will be available. If so, the City will leverage CDBG funds to re-apply.

The CDBG grant does not require the City to provide a match. It leverages General Fund dollars for tree removal and program staff.

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

The City acquires approximately 6-8 properties a year through code violations and/or abandonment. When the property is rehab-eligible, it is generally donated to YouthBuild for rehabilitation and then sold to a low or moderate income household. If the property is too dilapidated to repair, the City will demolish and clear the property and provide new water and sewer connections if necessary. The property is then donated to either Habitat for Humanity or YouthBuild for construction of new affordable housing.

The City does not currently own any other properties that are appropriate to address the needs identified in this plan.

Discussion

Staff will continue to seek additional funding opportunities and partnerships to further leverage CDBG funding and meet the goals and objectives outlined in this Action Plan.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort	Goal Name	Start	End	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year					
1	Decent Housing -	2015	2020	Affordable	WEST BLOOMINGTON	Affordable	CDBG:	Homeowner Housing
	Rehabilitation			Housing	REVITALIZATION	Housing	\$355,508	Rehabilitated: 23
					PROJECT AREA			Household Housing Unit
					Low and moderate			
					income areas outside of			
					West Bloomington			
					Revitalization Project			
2	Sustainable Living	2015	2020	Affordable	WEST BLOOMINGTON	Affordable	CDBG:	Buildings Demolished: 5
	Environment -			Housing	REVITALIZATION	Housing	\$179,868	Buildings
	Demolition				PROJECT AREA			
					Low and moderate			
					income areas outside of			
					West Bloomington			
					Revitalization Project			

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Sustainable Living	2015	2020	Affordable	WEST BLOOMINGTON	Affordable	CDBG:	Public service activities
	Environments -			Housing	REVITALIZATION	Housing	\$20,500	other than Low/Moderate
	Emergency Grant			Homeless	PROJECT AREA	Homlessness		Income Housing Benefit: 20
					Low and moderate			Persons Assisted
					income areas outside of			
					West Bloomington			
					Revitalization Project			
5	Suitable Living	2015	2020	Homeless	WEST BLOOMINGTON	Affordable	CDBG:	Public service activities
	Environment -			Non-Homeless	REVITALIZATION	Housing	\$55,080	other than Low/Moderate
	Public Services			Special Needs	PROJECT AREA	Homlessness		Income Housing Benefit:
				Non-Housing		Non-Housing		2600 Persons Assisted
				Community		Community		
				Development		Development		
6	Creating Economic	2015	2020	Non-Housing	WEST BLOOMINGTON	Non-Housing	CDBG:	Public Facility or
	Opportunity -			Community	REVITALIZATION	Community	\$10,000	Infrastructure Activities
	Job/Life Skills			Development	PROJECT AREA	Development		other than Low/Moderate
					Low and moderate			Income Housing Benefit: 20
					income areas outside of			Persons Assisted
					West Bloomington			
					Revitalization Project			
8	Suitable Living	2016	2020	Non-Housing	Low and moderate	Affordable	CDBG:	Public Facility or
	Environment -			Community	income areas outside of	Housing	\$65,000	Infrastructure Activities
	Public Facilities			Development	West Bloomington	Non-Housing		other than Low/Moderate
					Revitalization Project	Community		Income Housing Benefit:
						Development		3200 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	West Bloomington	2015	2020	Affordable	WEST BLOOMINGTON	Affordable	CDBG:	Public service activities
	Revitalization			Housing	REVITALIZATION	Housing	\$13,600	other than Low/Moderate
	Project			Non-Housing	PROJECT AREA	Non-Housing		Income Housing Benefit:
				Community	Low and moderate	Community		100 Persons Assisted
				Development	income areas outside of	Development		Public service activities for
					West Bloomington			Low/Moderate Income
					Revitalization Project			Housing Benefit: 50
								Households Assisted
								Homeowner Housing
								Rehabilitated: 8 Household
								Housing Unit

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Decent Housing - Rehabilitation		
	Goal	The City will help preserve its housing stock by providing rehabilitation loans and grants to single-family, owner-occupied		
	Description	households with low and moderate income. Individual projects are typically limited to \$24,999 or less in funding in the		
		form of a 0% interest deferred loan. The City provides grants to disabled residents through a partnership with		
		AMBUCS. Other grants may be offered on a very limited basis.		

2	Goal Name	Sustainable Living Environment - Demolition
		Elimination of slum and blight conditions caused by deteriorated structures through demolition and clearance of accessory structures and/or dwellings. Properties considered buildable will be donated to organizations such as YouthBuild or Habitat for Humanity for new construction of affordable housing when possible.
3	3 Goal Name Sustainable Living Environments - Emergency Grant	
	Goal Description	Provide assistance to low and moderate income households with payments, not to exceed 3 months, for items such as food, clothing, housing (rent/mortgage), utilities or emergency shelter. The project will be administered through PATH. Payments made on behalf of the household will be made directly to the provider. Funds are obligated under the Public Services project.
5	5 Goal Name Suitable Living Environment - Public Services	
	Goal Description	The City will utilize CDBG funds to assist local organizations that enhance the quality of life of Bloomington residents through Public Service projects. All projects must provide services to low and/or moderate income individuals. Projects do not have to be housing-related.
6	Goal Name	Creating Economic Opportunity - Job/Life Skills
	Goal Description	The City will partner with the Bloomington Housing Authority (BHA) to provide job and life-skills training for BHA residents in an effort to meet HUD's Section 3 requirement. Section 3 is a provision of the Housing and Urban Development (HUD) Act of 1968 that helps foster local economic development, neighborhood economic improvement, and individual self-sufficiency. All recipients of HUD funding are required to meet the Section 3 requirements and report annually on activities. Funds are obligated under the Administration and General Management project.

8	Goal Name	Suitable Living Environment - Public Facilities
Description period. Through this Action Plan, the City will provide funding for two properties and the WBRP Bus Stop Intitiative. Heartland Head Start will receive \$20 appropriate playground equipment for its Early Childhood Education proplace concrete pads at five bus stops within the WBRP service area. The		The City will utilize CDBG funding to make improvements to Public Facilities throughout the 2015-2019 Consolidated Plan period. Through this Action Plan, the City will provide funding for two projects: Heartland Head Start's ECE Playground and the WBRP Bus Stop Intitiative. Heartland Head Start will receive \$20,000 for the purchase and installation of age-appropriate playground equipment for its Early Childhood Education program. Connect Transit will receive \$10,000 to place concrete pads at five bus stops within the WBRP service area. The WBRP Tool Library will build wooden benches to place on the pads.
9	Goal Name	West Bloomington Revitalization Project
	Goal Description	The City will provide funding to the West Bloomington Revitalization Project to support two programs - the Tool Library and Facade Program. The Facade Program's target area is the WBRP service area while the Tool Library is open to everyone but primarily serves those in West Bloomington. In addition to lending home repair and maintenace tools and equipment, the Tool Library also provides educational programs for all ages. This activity will require a minimum of 4 workshops during the program year.

Projects

AP-35 Projects - 91.220(d)

Introduction

The overriding goal of all projects and activities completed with CDBG funding is to strengthen the quality of life for Bloomington residents and their neighborhoods. The City will continue to utilize CDBG funds to support activities that will work towards this goal. The following projects have been selected for implementation during Program Year 42.

Projects

#	Project Name
1	Rehabilitation Grants and Loans
2	Rehabilitation Service Delivery Costs
3	Administration and General Management
4	Demolition Program
5	Public Services
6	Infrastructure/Public Facilities
7	West Bloomington Revitalization Project

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

HUD requires CDBG jurisdictions to expend a minimum of 70% of CDBG funding on low and moderate income persons. The City selects projects with this requirement in mind. Additionally, information provided in the 2015-2019 Consolidated Plan supports the need for housing, public service and infrastructure/public facility projects in low-income census tracts. The majority of activities/funding outlined in this Action Plan will benefit households in the West Bloomington Revitalization Project service areas and other low-income areas of the City.

AP-38 Project Summary

Project Summary Information

1	Darita di Nic	B. L. Lillian Co. and an all lands
•	Project Name	Rehabilitation Grants and Loans
	Target Area	WEST BLOOMINGTON REVITALIZATION PROJECT AREA Low and moderate income areas outside of West Bloomington Revitalization Project
	Goals Supported	Decent Housing - Rehabilitation West Bloomington Revitalization Project
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$347,508
	Target Date Estimate the number	This project will provide funding to low and moderate income households for necessary/emergent home repairs. The majority of homeowners will receive assistance in the form of a 0% interest deferred loan with the balance deferred as long as the beneficiary remains owner-occupant of the home. Grants will be provided on a very limited basis. The City will continue its partnership with AMBUCS, providing grants to disabled individuals for accessibility ramps. The budget breakdown is \$243,246 for loans and \$25,000 for grants. A portion of any carry-forward funds from Program Year 41 will be added to this activity should the funds be available. Program Income may also be added to activities under this project. Update: The August 31, 2016 Substantial Amendment added an additional \$79,262 to this project bringing the total to \$347,508.
	Estimate the number and type of families that will benefit from the proposed activities	See previous version of the 2016 Annual Action Plan.
	Location Description	See previous version of the 2016 Annual Action Plan.
	Planned Activities	Scope of work will be limited to moderate rehabilitation on single-family, owner-occupied homes. Homeowners will receive assistance through 0% interest deferred loans. Loan repayment is not required as long as the beneficiary remains the owner-occupant. Homeowners interested in paying off the loan are allowed to make payments under the 0% interest loan terms. Grants will be provided on a very limited basis.
2	Project Name	Rehabilitation Service Delivery Costs
	Target Area	WEST BLOOMINGTON REVITALIZATION PROJECT AREA Low and moderate income areas outside of West Bloomington Revitalization Project

	Goals Supported	Decent Housing - Rehabilitation
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$8,000
	Description	This activity will fund expenses the City incurs while operating the Housing Rehabilitation Loan Program. Examples of expenditures include but are not limited to: rehabilitation staff training, license renewal fees and refresher courses, lead testing, and credit check for loan applicants. Carry-forward funding beyond the \$25,000 estimated may be added to this project increasing the budgeted amount.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	The Rehab Specialist plans to attend the HUD's Environmental Review Training tentatively scheduled for late June in addition to any other pertinent training. Lead testing will be performed on all rehabilitation projects as required per HUD guidelines. The City maintains an account with a credit service which it uses to ensure loan applicants do not have any federal judgments against them making them ineligible to receive federal assistance. Credit score is not used to determine program eligibility.
3	Project Name	Administration and General Management
	Target Area	WEST BLOOMINGTON REVITALIZATION PROJECT AREA Low and moderate income areas outside of West Bloomington Revitalization Project
	Goals Supported	Decent Housing - Rehabilitation Sustainable Living Environment - Demolition Sustainable Living Environments - Emergency Grant Suitable Living Environment - Public Services Creating Economic Opportunity - Job/Life Skills Suitable Living Environment - Public Facilities West Bloomington Revitalization Project

	Needs Addressed	Affordable Housing Homlessness Non-Housing Community Development
	Funding	CDBG: \$35,750
	Description	This activity is used for expenditures required for general administration of the grant and all its projects. Examples of expenses covered under this project include but are not limited to postage, advertising, professional development, office supplies, and contracted services. Additionally, funding for job and life-skills training for Bloomington Housing Authority residents, required by Section 3, is included in this project for Program Year 42. Carry-forward funds beyond the estimated \$25,000 may be added to administration if necessary, thus, increasing the project total. Program Income may be added to this activity as well. Update: The August 31, 2016 Substantial Amendment added \$15,000 to this project. The funds were added from carry-forward funds in excess of what was originally budgeted. The \$15,000 was added to provide funds to support a regional housing study, the results from which will be utilized to complete the Fair Housing Assessment.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	The Job and Life Skills training partnership with Bloomington Housing Authority will benefit approximately 30 Section 3 individuals.
	Location Description	Not applicable.
	Planned Activities	There will be no specific activities under this project. It will support the overall administration of the CDBG grant.
		Update: \$15,000 was added to this line item to support a regional housing study.
4	Project Name	Demolition Program
	Target Area	WEST BLOOMINGTON REVITALIZATION PROJECT AREA Low and moderate income areas outside of West Bloomington Revitalization Project
	Goals Supported	Decent Housing - Rehabilitation Sustainable Living Environment - Demolition
	Needs Addressed	Affordable Housing

	Funding	CDBG: \$179,868
	Description	This project will help eliminate slum and blight conditions of deteriorated structures by funding demolition and clearance of accessory structures and/or dwellings. Buildable lots will be donated to organizations such as YouthBuild and Habitat for Humanity for new construction of affordable homes. Non-buildable lots will be donated to not-for-profit organizations for use as green space or equally divided and deeded to adjacent land owners. Carry-forward funding beyond the estimated \$25,000 and Program Income may be added to this line item.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Demolition and clearance of 5-7 properties within the limits of the City of Bloomington.
5	Project Name	Public Services
	Target Area	WEST BLOOMINGTON REVITALIZATION PROJECT AREA Low and moderate income areas outside of West Bloomington Revitalization Project
	Goals Supported	Sustainable Living Environments - Emergency Grant Suitable Living Environment - Public Services
	Needs Addressed	Affordable Housing Homlessness Non-Housing Community Development
	Funding	CDBG: \$75,580
	Description	Activities under this project will assist local organizations to enhance the quality of life for residents of Bloomington through Public Service projects.
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	PATH
		 Funding to support 2 FTE positions assisting the homeless- Homeless Outreach Worker (\$14,000)/Housing and Benefits Specialists (\$9,680)
		Emergency Grant Program (\$20,000)
		Mid Central Community Action
		 Neighborhood Safety and Security/Resident Officer Program (\$5,000)
		Partners for Community
		Recycling Furniture for Families (\$5,000)
		Peace Meals Senior Nutrition
		Congregate and Home-delivery of meals for seniors (\$20,000)
6	Project Name	Infrastructure/Public Facilities
	Target Area	WEST BLOOMINGTON REVITALIZATION PROJECT AREA Low and moderate income areas outside of West Bloomington Revitalization Project
	Goals Supported	Suitable Living Environment - Public Facilities
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$65,000
	Description	This project will provide funding for two public facility projects. Heartland Head Start will receive \$20,000 for the purchase and installation of ECE playground equipment at their Bloomington facility. Connect Transit will receive \$10,000 for five concrete pads placed at bus stops within the WBRP service area. WBRP Tool Library will build wooden benches to place on the pads. Shelters may be added in a later phase of the project.
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	ECE playground at Heartland Head Start.
		Five concrete pads at bus stops.
		Update: The August 31, 2016 Substantial Amendment added \$35,000 for this project so that a small sewer project could be completed in the City's designated slum/blight area. The project experienced several unanticipated delays so it will not begin until 2017. It has been included in the 2017 Annual Action Plan with an additional \$40,000 added to the budget.
7	Project Name	West Bloomington Revitalization Project
	Target Area	WEST BLOOMINGTON REVITALIZATION PROJECT AREA Low and moderate income areas outside of West Bloomington Revitalization Project
	Goals Supported	Decent Housing - Rehabilitation West Bloomington Revitalization Project
	Needs Addressed	Affordable Housing Non-Housing Community Development
	Funding	CDBG: \$13,600
	Description	This project will support two West Bloomington Revitalization Projects programs - Facade and Tool Library.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities Location Description	

Planned Activities

The Facade Program will assist 7-10 homeowners with exterior repairs. The majority of repairs will be completed the week of July 4th in conjunction with a program called WorkCamp. WorkCamp, sponsored through a local church, chose to partner with WBRP for the 2016 program. WorkCamp will bring hundreds of youth volunteers to the community to complete up to 80 home improvement projects for income eligible residents. While the Facade program focuses on exterior repairs only, WorkCamp is offering interior repairs and maintenance as well.

The Tool Library will provide free tool loans to both homeowners and renters. The service is open to everyone but primarily used by Westside residents. In addition to tool loans, the Tool Library will sponsor at least four educational workshops.

Update: The August 31, 2017 Substantial Amendment reduced funding for this project was reduced by \$1,400 to \$13,600. The \$1,400 was moved to the Public Service project for Tool Library workshops. Expenses for the workshops are eligible under the Public Services but not Low Mod Housing.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The majority of the CDGB assistance will take place in and around the low and moderate-income census tracts with an emphasis on the West Bloomington Revitalization Project (WBRP) Area. WBRP has extended its boundaries from those defined in the original West Bloomington Plan. The WBRP Area is bounded by Hinshaw Ave. on the north, Roosevelt Ave. on the east, Oakland Ave. on the south and Euclid Ave. to on the west. This area encompasses the City's designated Slum/blight Area. See the Maps section in the appendix for reference on the City's Designated Low-Mod and Slum/Blight areas as well as the defined service area for WBRP.

Geographic Distribution

Target Area	Percentage of Funds
WEST BLOOMINGTON REVITALIZATION PROJECT AREA	
Low and moderate income areas outside of West Bloomington Revitalization	
Project	

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

In August 2015, the City of Bloomington adopted a new Comprehensive Plan. The Plan identified West Bloomington as a Regeneration Area due to the aged housing stock and infrastructure as well as lower property assessments. The Plan indicates that the City should prioritize spending in this area and create partnerships with other public, private and not-for-profit entities to revitalize West Bloomington comprehensively. By concentrating CDBG rehabilitation, demolition and infrastructure dollars in this area over the next several years and leveraging funds when possible, the City can make great strides in regenerating the area. Additionally, partnerships such as the West Bloomington Housing Collaborative, which focuses specifically on the Westside, will continue to leverage multiple funding sources creating an even larger impact.

The Housing Collaborative has primarily focused their revitalization efforts on W. Jefferson thus far. The City supports the Collaborative by providing WBRP with funds for its Facade program and Tool Library and by funding the demolition and clearance of dilapidated structures in the area. Once the properties are cleared, buildable lots are donated to Habitat for Humanity or YouthBuild for new construction of affordable homes. Non-buildable lots are typically donated to local not-for-profits to create green space. The City will donate one such property to WBRP in early 2016 for use as an educational flower

garden.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City will focus on affordable housing in a variety of ways during the duration of this Plan. The Rehabilitation Loan/Grant Program provides low and moderate income homeowners the opportunity to make necessary and emergent improvements to their homes through 0% interest deferred loans. Homeowners are allowed to make payments on the loan balance throughout the terms of the loan if they prefer to do so. Grants are offered on a very limited basis. The City will donate buildable lots to organizations such as Habitat for Humanity and YouthBuild for new construction of affordable homes. The lots will be cleared of dilapidated structures and connected to City water and sewer prior to donation. Properties the City receives that are rehab-eligible will be donated to organizations such as YouthBuild for rehabilitation and resale to low and moderate income individuals and families at an affordable price.

Through the Supportive Housing Program's Shelter Care Plus grant, the City will help support rental assistance for five Bloomington Housing Authority residents at Mayor's Manor. This grant is one of six Continuum of Care grants for which the City serves as fiscal agent. Rental assistance is also one eligible expense under PATH's Emergency Grant to which the City provides \$20,000 annually. No households for this grant were included in the numbers below, however, as the grant covers a wide range of expenses.

One Year Goals for the Number of Households to be Supported			
Homeless	0		
Non-Homeless	30		
Special-Needs	0		
Total	30		

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through		
Rental Assistance	5	
The Production of New Units	0	
Rehab of Existing Units	0	
Acquisition of Existing Units	0	
Total	5	

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

Staff will continue to participate on several working groups dedicated to affordable housing issues. The Grants Coordinator participates on both the Continuum of Care Tiny Home Working Group and the

League of Women Voter's Action Group for Affordable Housing. planning phase of program development at this time.	Both groups are in the research and
planning phase of program acreiopment at this time.	

AP-60 Public Housing — 91.220(h) Introduction

Actions planned during the next year to address the needs to public housing

The City had originally planned to assist the Bloomington Housing Authority (BHA) with a roof replacement on a BHA-owned building. BHA planned to use the currently vacant building as administration space, thus opening up additional apartments for rent in Woodhill Towers. However, the City reallocated the funds into other Public Facility projects after notification that the end-use of the building could possibly change after renovations were complete. The City will readdress this project in the future if it appears as though it will meet a national objective.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The Bloomington Housing Authority has established a Program Coordinating Committee (PCC) to help achieve the goals and fulfill the purpose of the Family Self Sufficiency Program. The goal of the program is to have one family purchase a home in the next year. The Housing Authority also hopes to increase tenant engagement in the coming year by re-establishing Resident Councils at the various public housing sites. The West Bloomington Housing Collaborative is working with the Bloomington Housing Authority to identify potential homeowners for its homes rehabilitated through the Illinois Attorney's General grant as well.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Bloomington Housing Authority is designated as a standard performer.

Discussion

AP-65 Homeless and Other Special Needs Activities – 91.220(i) Introduction

The City will continue to serve as a co-lead agency with PATH for the McLean County Continuum of Care. The Continuum of Care seeks to address the current homeless client base as well as any additional demands on the homeless system through these primary goals:

- Increase the stock of affordable and/or subsidized housing throughout McLean County for homeless and chronically homeless;
- Improve supportive services for the homeless;
- Increase public awareness and support for plans to end homelessness;
- Increase the focus on prevention;
- Identify the chronically homeless population and work towards the ten year plan to end homelessness;
- Increase the percentage of people moving into permanent housing.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

The City anticipates that it will receive funds from the 2016 McKinney-Vento Fund for the Continuum of Care program. The annual allocation is expected to be approximately \$320,000. The six grants funded through the City's Continuum of Care funds help support counseling services, child care, moving expense and furniture, case management, rental assistance and prevention education for the homeless population as well as those in imminent danger of becoming homeless. Several agencies beyond the City receive funding through the McKinney-Vento Fund and other sources to provide additional services to the homeless such as emergency shelter, food and medical care.

In addition, the City plans to provide CDBG funds for the following activities:

- \$20,000 to PATH for Emergency Services Grant for the prevention of homelessness by assisting with emergency rent, utilities and repairs;
- \$23,680 to PATH for Continuum of Care matching funds in support of 2 FTE positions Homeless
 Outreach Worker and Housing and Benefits Specialist

Addressing the emergency shelter and transitional housing needs of homeless persons

The City has utilized CDBG funding in the past to benefit supportive housing projects such as Mayor's Manor and Labyrinth. Funds have also been provided to the Salvation Army for rehabilitation projects

Annual Action Plan

related to shelter. There are no specific rehabilitation projects planned for PY42 that will address emergency shelter or transitional needs but the City will continue to serve as co-lead agency for the Continuum of Care program and provide PATH with financial assistance to help cover emergency expenses and provide case management to the homeless. Rapid re-housing remains the top priority for all Continuum of Care agencies.

The Salvation Army has a fairly new shelter that helped fill a need for single, homeless women. There is still a lack of shelter beds for families with children, however. Funding for additional beds is not looking to be at option at this time. When the shelters in Bloomington are full, PATH can bus homeless individuals/families with children to shelters throughout the state if there are beds available. However, the shelter system in the state is often overtaxed resulting in full capacity throughout.

Labyrinth Outreach Services has a supportive housing program for recently incarcerated women. The City assisted with the project by helping identify potential properties, providing funding to assist with rehabilitation and partially supporting a case manager position. The program can provide supportive housing for up to ten women at a time.

A map of Supportive and Transitional Housing in Bloomington is located in the Maps section of the Appendix.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The City of Bloomington, in conjunction with the Continuum of Care, has followed several strategies for helping low income families avoid becoming homeless:

- Refer clients to PATH information and referral lines to gain knowledge of services available and to access PATH's Homeless Services, if necessary;
- Provide emergency funds to be administered by PATH to help families avoid eviction or condemnation (\$20,000 CDBG funding);
- Working with the Bloomington Township office, which provides emergency and general assistance to residents;
- Providing assistance to local organizations seeking continuation of homeless prevention funds from the State of Illinois, including but not limited to writing letters of support;
- Assisting various social service organization offering services to this population as necessary;
- Advocating that the State Legislature to provide more emergency assistance to potential

homeless clientele.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

<u>Health Care Discharge Planning:</u> Health care facilities are charged with the responsibility to not release patients to the streets or McKinney-Vento funded beds. Social work departments within the hospital must initiate and implement discharge planning. Hospitals are only allowed to discharge to nursing homes, rehabilitation centers or stable homes. Clients may be released to a homeless shelter only when that patient was homeless prior to the hospital stay and the stay was less than 30 days. The COC maintains regular contact with local hospitals and institution staff to assure that disruptions from staff turnover are minimized. In addition, healthcare administrators and social workers take part in COC meetings and agency brochure and housing information are shared with hospitals on a regular basis.

Foster Care Discharge Planning: In 1999, Congress enacted the Foster Care Independence Act (FCIA), authorizing \$140 million for the John H. Chafee Foster Care Independence Program (Chafee) to improve service delivery for foster youth transitioning out of care. With the implementation of Chafee, Illinois developed the Youth Housing Assistance Program (YHAP), which provides housing advocacy and cash assistance to youth aging out of foster care. YHAP targets youth at risk of becoming homeless who are approaching emancipation or who have already emancipated from the foster care system. The Department of Children and Family Service (DCFS) case workers create individual service plans for those exiting the foster care system. The plans include making referrals to the YHAP rather than the McKinney-Vento funded beds. Housing advocacy is provided for youth at least age 17 1/2 and less than 21. Cash assistance is provided to youth between their 18th and 21st birthdays. Caseworkers refer youth to YHAP six months before emancipation if they are in need of housing services. Youth may receive: 1) Housing advocacy; 2) Start-up Grants; 3) Partial Housing Subsidy; and 4) Crisis Cash Assistance. Follow-up services are provided for a minimum of three months after the client secures appropriate housing.

Corrections Discharge Planning: IL Department of Corrections (IDOC) programming prepares offenders for successful community re-entry without placement in McKinney-Vento programs. TRAC (Trained Reformed and Capable) begins at intake and extends throughout the length of stay. A successful reentry plan identifies the offender's housing needs, works to obtain appropriate housing and mandates a verifiable address before release. Those with special needs such as substance abuse, mental health issues, and disabilities are assigned dedicated staff that mentor their programming progress while

incarcerated and make referrals to the Placement Resource Unit (PRU). PRU works with vendors that provide specialized services for offenders in the community and find special needs housing.

Mental Health Discharge Planning: Mental health state protocols do not include referrals to McKinney-Vento programs as people exiting institutional care are ineligible for assistance. The state has policies to assure that patients are not discharged to homelessness unless they choose to not accept the institution's discharge plan. Community mental health agencies access half-way houses, boarding facilities, transitional housing funded through non-HUD sources and Section 8 vouchers to serve the population coming from an institution.

Discussion

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

The City has several projects planned that will help increase the affordable housing stock and help lowand moderate-income families maintain their current homes. The City has updated its Analysis of Impediments to Fair and Affordable Housing document in 2014. A copy is located in the Appendix section of the 2015-2019 Consolidated Plan.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The City of Bloomington has utilized a Zoning Ordinance since 1979 that guides land use development policies and decisions. The ordinance specifically mentions affordable housing and promotes it throughout the community, while at the same time specifically discourages large concentrations of low-income populations. The ordinance adequately provides for future development opportunity, including in-fill development that would be ideal for affordable housing. The City applies local zoning regulations that guide development across the community and attempts to encourage mixed-use development as well as traditional neighborhood designs. There are no excessive minimum lot standards in the code or other provisions that would dramatically hinder affordable housing development. The City regularly receives comments from housing developers on the zoning code and rarely, if ever, hears that the code is an impediment to fair and affordable housing.

Discussion:

The City will increase the stock of affordable housing by dedicating CDBG funding for demolition of deteriorating structures and deeding the lots to either Habitat for Humanity or YouthBuild for the purpose of new construction of affordable housing. The City donates approximately 6-10 properties a year to Habit and/or YouthBuild. The City currently waives all permit fees for its not-for-profit developers. Staff will advocate for the continuation of this practice.

The City will continue to offer the Rehabilitation Loan Program which provides funding for home improvements such as roof replacement and new siding and windows to low and moderate-income households. The program also provides for emergency sewer and water repairs. In many cases, this program makes the difference between a family being able to remain in their home or being displaced

due to conditions that make the home uninhabitable but are too costly for them to fix on their own.

HUD released new regulations for Affirmatively Furthering Fair Housing in January 2016. Staff will review the regulations to determine necessary changes, if any, in order to remain compliant in the future. The City is not required to comply with the new regulations until the next Consolidated Plan is due in 2020.

AP-85 Other Actions - 91.220(k)

Introduction:

The majority of the actions planned at this time have already been outlined in the previous sections of this Action Plan.

Actions planned to address obstacles to meeting underserved needs

Funding is one obstacle the program currently faces when meeting the needs of underserved populations. Additional grant dollars beyond CDBG/HUD funding will be obtained when possible. The City will partner with local non-profits for grants unavailable to local government. Staff will continue to serve on committees and work groups that address the housing needs of low and moderate income families. The City will remain the fiscal agent for the McLean County Continuum of Care, which addresses the needs of the City's homeless.

Actions planned to foster and maintain affordable housing

The City will continue to partner with organizations such as YouthBuild and Habitat for Humanity for the construction and rehabilitation of affordable housing units. Additionally, the City will look for other opportunities to foster partnerships that will help maintain or increase the current stock of affordable housing units as well as support rehabilitation efforts designed to allow low and moderate income families to remain in their homes.

Actions planned to reduce lead-based paint hazards

All CDBG contractors are required to maintain RRP certification. The City will continue to offer RRP certification training every five years for registered contractors. Additionally, the City's Rehab Specialist will obtain and maintain all necessary licenses and certifications to ensure that lead-based paint safety practices and policies are being followed for all CDBG projects.

Actions planned to reduce the number of poverty-level families

The City will continue to support the Bloomington Housing Authority's job training program annually. Once the Grants Coordinator has had an opportunity to attend a HUD Basically CDBG training,

the City will explore additional job development opportunities.

Actions planned to develop institutional structure

The City has no plans at this time to develop additional institutional structure.

Actions planned to enhance coordination between public and private housing and social service agencies

The City will continue to serve as the fiscal agent for the McLean County Continuum of Care. Additionally, staff will continue to participate in various work groups and committees comprised of staff from local social service agencies, business, churches and governments.

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

All program income received in Program Year 41 will be reprogrammed prior to the start of Program Year 42. The City anticipates there will be very little carry-forward funding from Program Year 41.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next	
program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to	
address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not	
been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0
Other CDBG Requirements	
1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that	
benefit persons of low and moderate income. Overall Benefit - A consecutive period	
of one, two or three years may be used to determine that a minimum overall	
benefit of 70% of CDBG funds is used to benefit persons of low and moderate	
income. Specify the years covered that include this Annual Action Plan. 75	.00%

The City does not current	ly operate a Section 1	08 loan program or	urban renewal settle	ements.

Attachments

Grantee Unique Appendices



Community Development Division
Planning and Code Enforcement Department
115 E. Washington Street
Bloomington, IL 61702
309-434-2342 (phone) 309-434-2801 (fax)

August 31, 2016

Ray Willis, Director
US Department of Housing and Urban Development
Chicago Regional Office
77 W. Jackson Blvd,
Chicago, IL 60604-3507

Dear Mr. Willis:

The City of Bloomington has created a Substantial Amendment to the FY42 (2016-2017) Action Plan as required by the Citizen Participation Plan. The following activities were included in the Amendment:

- New activity providing funds for an infrastructure activity in the City's designated slum/blight area.
- Additional funds added to the Administration and General Administration activity to support a comprehensive regional housing study.
- A new public service project allowing the West Bloomington Revitalization Project to provide community education workshops.

The Amendment was available for public comment for the required period from July 27 – August 30, 2016. A public hearing was scheduled on August 30, 2016. One person attended the hearing. Minutes from the hearing are attached.

Attached you will also find a copy of the Certificate of Publication for the Substantial Amendment as well as copies of the public hearing agenda.. These documents have been uploaded to IDIS and are awaiting HUD's approval.

Please feel free to contact me if you have any questions regarding this amendment.

Sincerely

David A. Hales City Manager

CC: Kimberly Danna

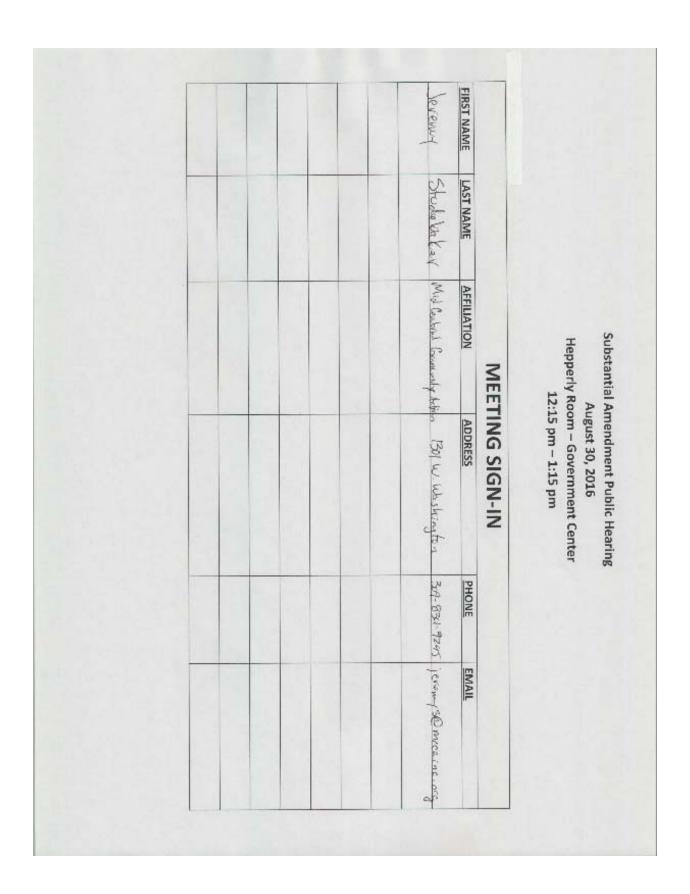
Substantial Amendment Public Hearing August 30, 2016 Hepperly Room – Government Center 12:15 pm – 1:15 pm

Welcome Jennifer Toney

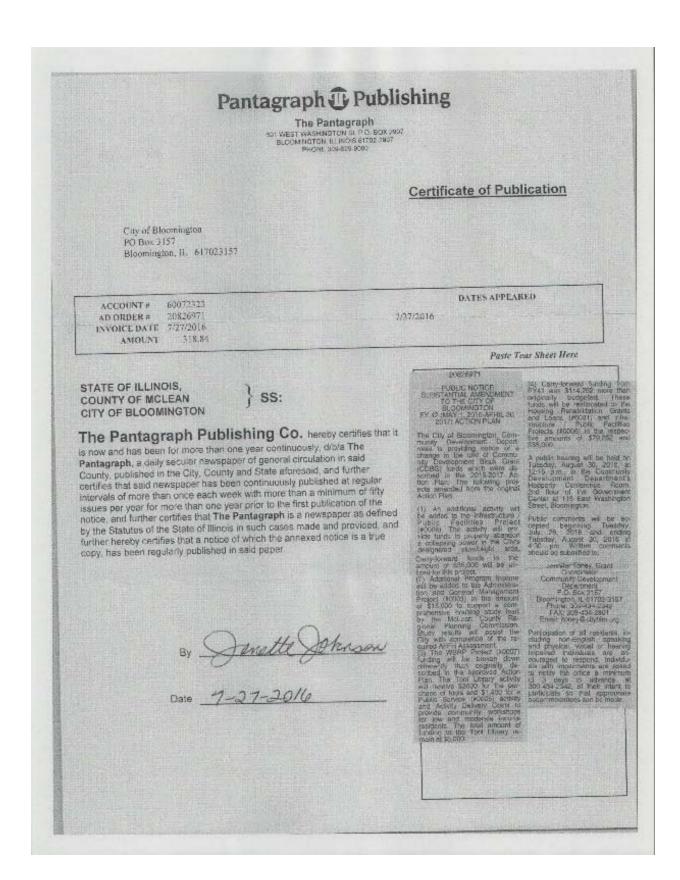
Review Amendments Jennifer Toney

Public Comments Open to Public

Closing Jennifer Toney



Substantial Amendment Public Hearing Minutes August 30, 2016 Hepperly Room - Government Center 12:15 - 1:15 pm Jennifer Toney opened the meeting by welcoming Jeremy Studebaker from Mid Central Community Action. Jeremy indicated he was attending as a member of the West Bloomington Housing Collaborative, of which WBRP is also a member. Jennifer explained the Citizen Participation Plan requirements for new activities and changes to existing projects. She provided an overview of the activities described in the amendment and why the changes were necessary to the Tool Library activity. Jeremy indicated that the amendments seemed necessary and will benefit West Bloomington. He is eager to see the results from the housing study. Meeting adjourned at 12:35 pm.





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PATH-O-GRAM

A free service provided by PATH

August 8, 2016

HOW FRESH IS YOUR PATH DIRECTORY? If you currently own a PATH directory, check your "freshness date" at the bottom right-hand comer. Is it over a year old? Make sure you have the very latest information to make the right referrals for your clients. Resources are constantly changing. If you do not own PATH's Directory and you are working with people in nearly any capacity, you need one! Cost is \$50 per directory for McLean County only information, \$55 per directory for McLean, DeWitt & Livingston Counties combined. Additional charges apply if shipping is required. Contact Amanda at 834-0580 or apadgitt@pathcrisis.org and order a directory printed fresh for you.

PATH's Community Resource Seminars – 2016. We want to answer your questions about our local system of social services – register today for our ½ day (4 hour) training! The cost is \$50/individual, plus \$45 (optional and special seminar rate) for the McLean/DeWitt/Livingston County PATH Directory or \$40 for the McLean County only Directory. Both go hand-in-hand with the seminar content.

Our next half-day seminars are Thursdays, Sept 15th and Thursday Oct 27th, from 8:30 am-12:30 pm.

To register, contact Amanda at 834-0580 or download the registration brochure from our website.

FREE Dental Clinic - SATURDAY, NOVEMBER 12, 2016

Registration begins at 7 am LIMIT: 120 patients

*** NO APPOINTMENTS TAKEN ***

All others will be referred to the McLean County Health Department Adult Dental Clinic

WHO IS ELIGIBLE?

Residents of McLean County

Adults with low income and no health insurance

Adults with dental pain, needing 1 or 2 teeth extracted.

WHAT WILL BE DONE?

It will be an "extraction clinic."

Limited to extractions of 1 or 2 teeth.

This is not for multiple extractions.

This is not for other dental care.

WHAT WILL IT COST?

There will be no charges to participants.

All services are provided by volunteers, who are donating their time and services to address the dental pain of persons lacking access to care.

WHERE WILL THIS TAKE PLACE?

At the office of Oral Surgeons: Dr.'s Doran, Capodice, Efaw & Ocheltree 109 N. Regency Drive, Bloomington

WHO ARE THE DENTISTS?

The above oral surgeons and several other local dentists will all volunteer their time and services at this free

ALL PATIENTS WILL COMPLETE HEALTH HISTORY FORMS WHEN THEY ARRIVE ON THE DAY OF THE FREE CLINIC

SPANISH INTERPRETERS WILL BE AT THE CLINIC

PUBLIC NOTICE - SUBSTANTIAL AMENDMENT TO THE CITY OF BLOOMINGTON FY 42 (MAY 1, 2016-APRIL 30, 2017) ACTION PLAN

The City of Bloomington, Community Development Department is providing notice of a change in the use of Community Development Block Grant (CDBG) funds which were described in the 2016-2017 Action Plan. The following projects amended from the original Action Plan.

- (1) An additional activity will be added to the Infrastructure/Public Facilities Project (#0006). The activity will provide funds to properly abandon a collapsing sewer in the City's designated slum/blight area. Carry-forward funds in the amount of \$35,000 will be utilized for this project.
- (2) Additional Program Income will be added to the Administration and General Management Project (#0003) in the amount of \$15,000 to support a comprehensive housing study lead by the McLean County Regional Planning Commission. Study results will assist the City with completion of the required AFFH Assessment.
- (3) The WBRP Project (#0007) funding will be broken down differently than originally described in the approved Action Plan. The Tool Library activity will receive \$3600 for the purchase of tools and \$1,400 for a Public Service (#0005) activity and Activity Delivery Costs to provide community workshops for low and moderate income residents. The total amount of funding to the Tool Library remain at \$5,000.
- (4) Carry-forward funding from PY41 was \$114,262 more than originally budgeted. These funds will be reallocated to the Housing Rehabilitation Grants and Loans (#0001) and Infrastructure/Public Facilities Projects (#0006) in the respective amounts of \$79,262 and \$35,000.

A public hearing will be held on Tuesday, August 30, 2016, at 12:15 p.m., in the Community Development Department's Hepperly Conference Room, 2nd floor of the Government Center at 115 East Washington Street, Bloomington.

Public comments will be accepted beginning Tuesday, July 26, 2016 and ending Tuesday, August 30, 2016 at 4:30 pm. Written comments should be submitted to:

Jennifer Toney, Grant Coordinator, Community Development Department P.O. Box 3157, Bloomington, IL 61702-3157
Phone: 309-434-2342, FAX: 309-434-2801, Email: itoney@cityblm.org

Participation of all residents, including non-English speaking and physical, visual or hearing impaired individuals are encouraged to respond. Individuals with impairments are asked to notify the office a minimum of 3 days in advance, at 309-434-2342, of their intent to participate so that appropriate accommodations can be made.

Free Bus Transit Orientations – Curious about public transportation? Want to know how it works or what the NEW ROUTES look like? Come to a Free Orientation, or call to schedule one for your group! LIFE Center for Independent Living (LIFE CIL), in association with Connect Transit, is offering a FREE Transit Orientation class. Attendees can expect to learn about both fixed-route, or "regular" bus service, and Connect Mobility, the ADA Paratransit option provided by Connect Transit. You'll learn how to read the fixed route bus maps and about trip planning options, "dos" and Don'ts" for riding fixed-route busses, who may be eligible for Paratransit service and how to apply and more.

The following orientations will be given by Shannon Tarkowski, Transportation Specialist, at LIFE CIL in Bloomington (2201 Eastland Dr. Suite 1, Bloomington IL 61704). If you have questions, you can reach her by phone 309-663-5433 or email: Shannon@lifecil.org.

Wednesday August 10, 11a-12n Wednesday September 14, 11a-12n

**To request an accommodation such as large print materials or an interpreter, please contact Shannon at least 8 business days before the orientation.

NOTICE: On-Site Transportation Orientations can be arranged for larger groups or organizations! Please contact Shannon to arrange: 309-663-5433 or Shannon@lifecil.org



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Now Accepting applications for Livingston, McLean and Woodford CountiesUniversity of Illinois Extension Money Mentor Program - Do you (or someone you know) feel like you need a personal trainer for your wallet? There are so many ways for you to take control of your finances! Let us be your trusted resource. The Money Mentor program pairs trained volunteers with people who want help with their money challenges. It provides strategies that can help you reach your financial goals. Money Mentors help with financial skills, encouragement, and coaching specific to your financial goals. It is FREE to meet with a Money Mentor. Interested people can fill out an application to be paired with a mentor at GO.ILLINOIS.EDU/MONEYMENTORS_LMW. For more information contact Pam Atkinson, Consumer Economics Educator at UIE-mm-unit12@illinois.edu.

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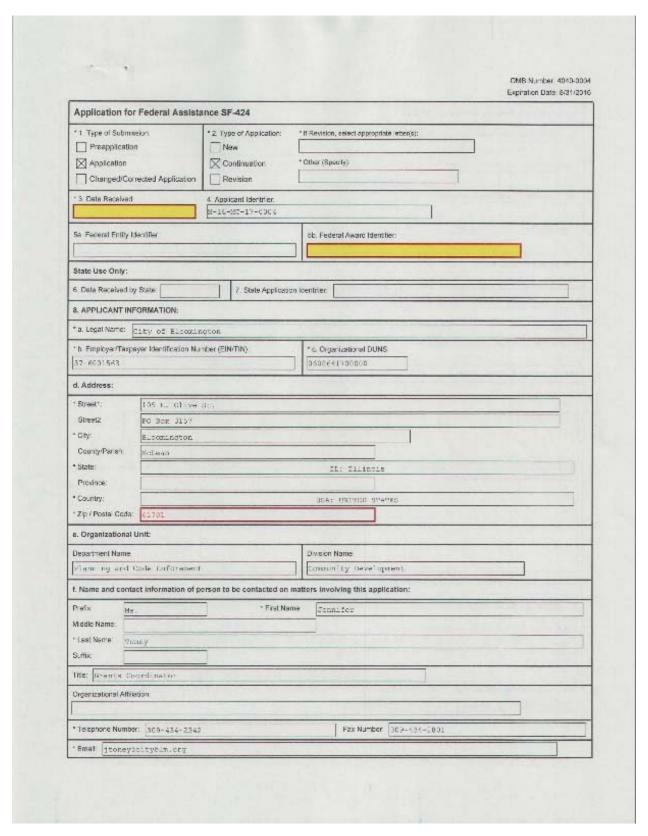
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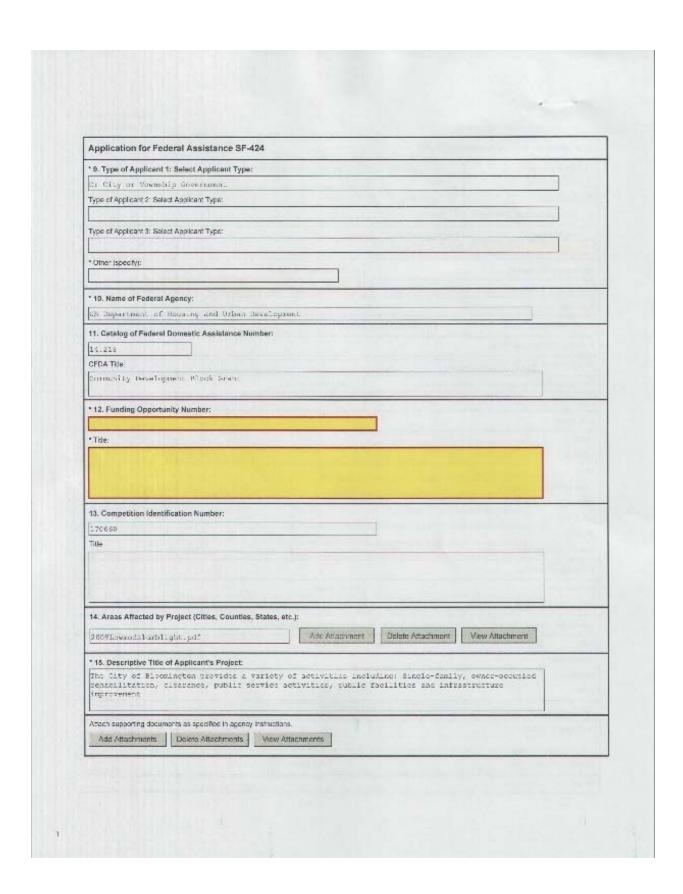
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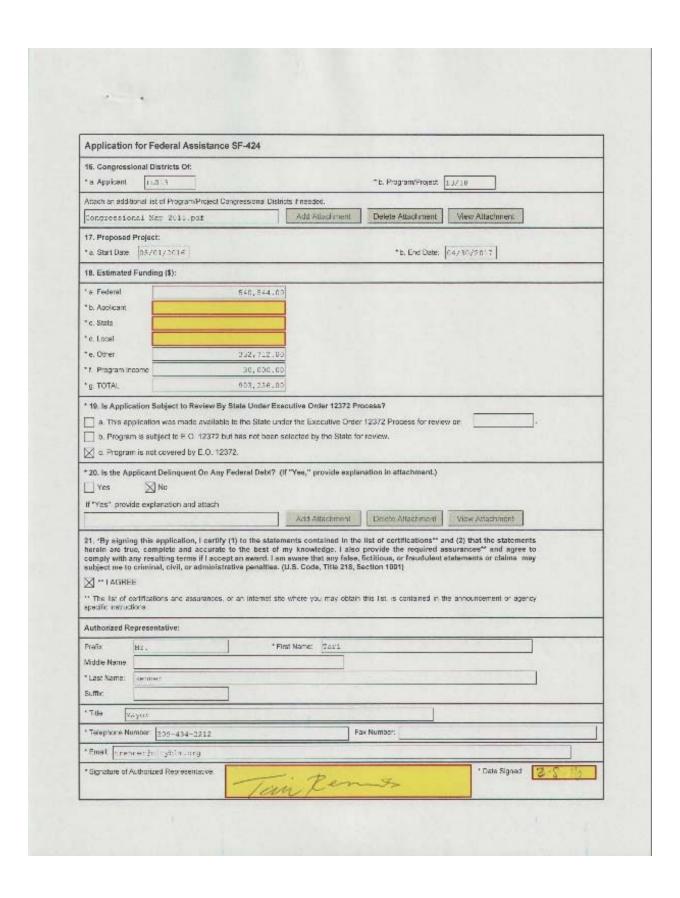
Saturday, August 27th, Center for Hope Ministries will hold its "Spread Hope Community Resource Expo" at its Outreach Headquarters located 1308 E. Empire in Bloomington Illinois. The event is open to the public and will run from 10:00 am-2:00 pm. Human service agencies from around the Twin Cities will gather to share valuable information regarding health, nutrition, family, & other vital resources. Area residents will be offered a variety of resources including free food, clothing, blood pressure screenings, and more. Children will find fun activities and back to school resources as well. Light refreshments will be provided and no advanced registration is required.

Questions? - Contact Pat Turner, Outreach Director, 309-808-3742 or outreach@cfhministries.org

Grantee SF-424's and Certification(s)







CERTIFICATIONS

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

Affirmatively Further Fair Housing — The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

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, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

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

- 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 and, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
- 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
- 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.

Authority of Jurisdiction -- The coasolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature/Authorized Official

Date 3-1-11

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91,105.

Community Development Plan — Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan — It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

- Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
- Qverall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2016, 2017 and 2018 (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
- 3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

A policy prohibiting the use of excessive force by law enforcement agencies within its

jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

 A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws — The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint — Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

Compliance with Laws - It will comply with applicable laws.

Signature/Authorized Official

Title