

Executive Summary

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

1. Introduction

The City of Bloomington is the entity responsible for implementing the 2020-2024 Consolidated Plan, adopted by the Bloomington City Council on June 8, 2020. The Economic and Community Development department is responsible for managing the City's housing and community development efforts supported with Community Development Block Grant (CDBG) funds. Program Year 2022 will run from May 1, 2022 - April 30, 2023 and be the 48th year the City has implemented the CDBG program.

Geographically, the City of Bloomington encompasses 27.22 square miles of land area within McLean County, the largest county in Illinois. Census data from April 2021 places Bloomington's population at 78,680 or 46.02% of the total population of McLean County. It is served by 3 interstates, 2 major freight railroads, Amtrak, and the Central Illinois Regional Airport. The majority of the County's social services are located in Bloomington, primarily in or near the downtown area. Bloomington is divided into three zip codes. The 2019 Community Health Needs Assessment (CHNA) has identified 61701 as one of four zip codes within McLean County with the greatest socioeconomic needs. 61701 was the top ranked zip code with the other two Bloomington zip codes 22nd and 23rd out of 23 total codes. Through the CHNA, housing was identified as one of five social determinants influencing the health of those residing in the 61701 zip code.

The City's Comprehensive Plan divides the City into four broad areas: Regeneration Area, Preservation Area, Stable Area and Emerging Area. The programs outlined in this Annual Action Plan will occur primarily in the Regeneration and Preservation Areas, both of which are identified as priority target areas in the 2020-2024 Consolidated Plan. The Comprehensive Plan classifies the Regeneration Areas as an area in need of immediate resources. This area is home to the City's oldest housing stock and has a higher percentage of rental units than owner-occupied housing. Improving the infrastructure in this area is a priority for the City and our community. Although the Preservation Area is considered more slightly more stable than the Regeneration Area, additional resources are necessary to maintain its stability. Both areas are located within the 61701 zip code area.

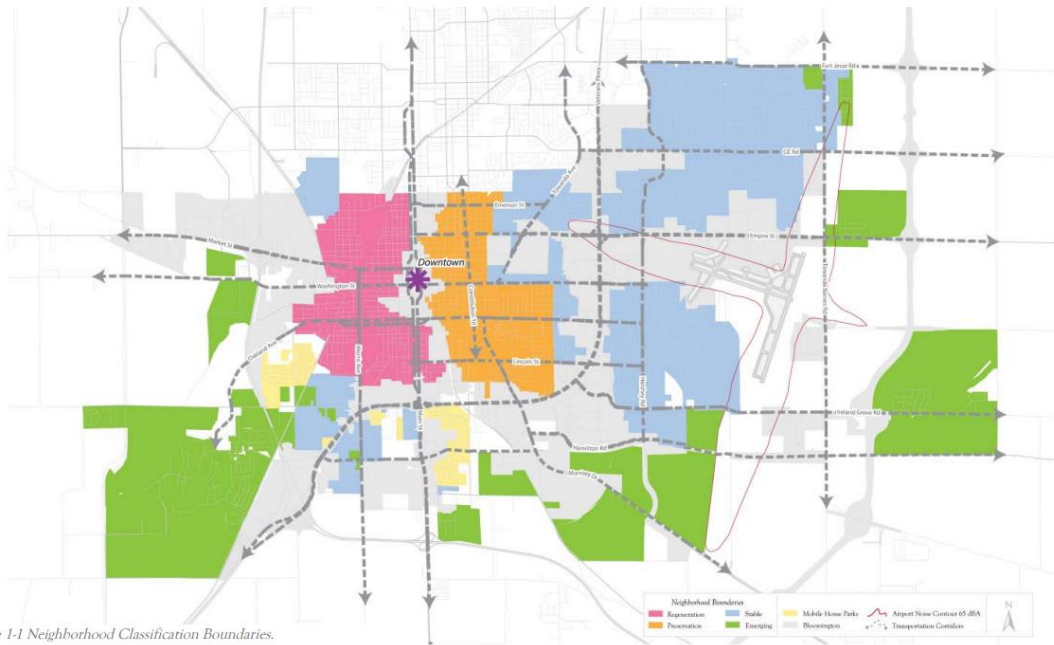
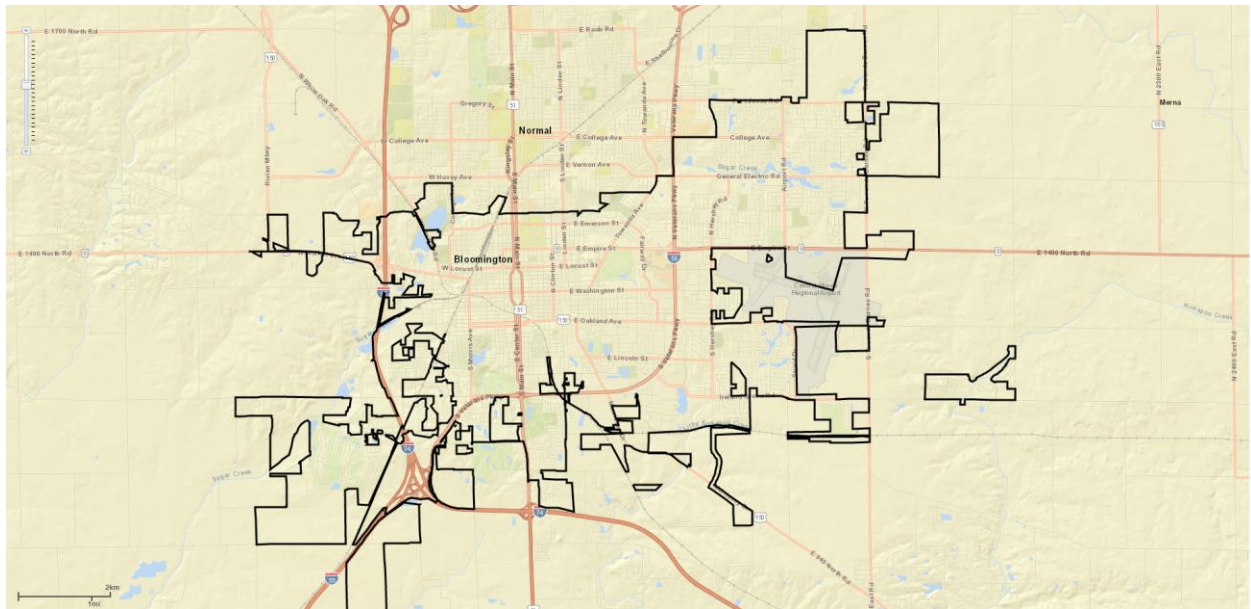


Figure 1-1 Neighborhood Classification Boundaries.

Comprehensive Plan Area Map



City of Bloomington Map

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 Action Plan Goals and Objectives for an overview of the goals and objectives to be met during 2022 Program Year.

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 chooses projects and activities based on the priority areas of the Consolidated Plan. The City, like other organizations across the nation, has battled through the COVID-19 Pandemic and associated impacts. Our organization is looking to re-set after this history changing period and improve performance. The core programs of the CDBG program each year include homeowner housing rehabilitation, demolition and clearance, public facilities and infrastructure improvements, and public services.

CDBG funds are made available to homeowner to perform critical home repairs and home modifications for accessibility improvements. In addition to CDBG, the City leverages Illinois Housing Development Authority (IHDA) rehabilitation funds through the Single Family Rehabilitation (SFR) program. These programs address the community's need to preserve the affordable housing stock. In total, the City supports approximately 20-25 housing rehabilitation projects a year.

Demolition and clearance of vacant/abandoned homes is another way the City addresses affordable housing. Once a lot is cleared, the City attempts to donate the property to Habitat for Humanity for construction of new affordable housing. If the property has never been connected to City water and sewer services, those connections are made prior to donating the property. When a property is not deemed buildable due to size or location, the City maintains the property until it can be donated to a local not-for-profit organization or sold. Approximately 2-3 demolition activities are completed each year.

In the past, public infrastructure improvements have included streets, sidewalks, sewers, and parks. During the outreach process for the 2020-2024 Consolidated Plan, the community strongly emphasized that sidewalks and parks should be the primary focus areas for CDBG. In recent years, CDBG funding has been utilized to build a new park in the Woodbury subdivision and make significant improvements to Evergreen Park. Sidewalk improvements have been made in the Dimmitt's Grove neighborhood and in West Bloomington along the W. Market corridor. Moving forward, the partnership with the City's Public Works Department will continue and public infrastructure projects that enhance multi-modal transportation options with sidewalk, park, and street improvements will be a focus.

The City of Bloomington is committed to affirmatively furthering fair housing. Through the CDBG funding provided to Prairie State Legal Services (PSLS) for their fair housing program, the City is activity funding efforts to eliminate and deter unfair housing practices. The program through PSLS provides critical legal services for community members that believe they have experienced housing discrimination.

Additionally, PSLS staff provide fair housing education and outreach services on the matter. An analysis of fair housing impediments was included in the 2020-2024 Consolidated Plan public outreach and planning process through the work of program partner Prairie State Legal Services. Additionally, fair housing information and research was included in the BN Home-Regional Housing Study published in October 2017.

CDBG regulations require public service activities be capped at 15% of the annual allocation. The City typically funds 5-6 public services project a year at the maximum allowed funding level. Long-standing public service partners include Providing Access To Help (PATH), Recycling Furniture for Families, Peace Meals, and the West Bloomington Revitalization Project.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

A notice of the availability of the Annual Action Plan and the public hearing was published in the Pantagraph on Friday, April 22, 2022. The notice was also published in the PATH-O-Gram and the City's website and social media pages. A public hearing was held on Monday, May 9, 2022. Public comments were accepted from May 6, 2022 through June 9, 2022 through means outside of the public hearing.

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.

No public comments were received during the public comment period or during the public hearing.

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

No public comments were received during the public comment period or during the public hearing.

7. Summary

No public comments were received during the public comment period or during the public hearing. The public comment period occurred from May 6, 2022, through June 9, 2022. A public hearing was held during the public comment period on May 9, 2022 during the City Council meeting.

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	Economic and Community Development Department

Table 1 – Responsible Agencies

Narrative (optional)

The City of Bloomington’s Economic and Community Development Department—Community Enhancement Division is the lead entity responsible for implementing the 2020-2024 Consolidated Plan. The Community Enhancement Division’s Grants Coordinator is responsible for preparing and submitting the Consolidated Plan, Annual Action Plans, Consolidated Annual Performance Evaluation Reports, Environmental Review Records, and other required reports. Additionally, the Grants Coordinator is responsible for overall financial monitoring/compliance, sub-recipient monitoring, applicant intake, records management, and community outreach activities related to CDBG funding.

In an effort to look at housing and community development issues on a more regional level, the City partnered with the Town of Normal (Town) and McLean County Regional Planning Commission (MCRPC) in the development of the 2020-2024 Consolidated Plan. MCRPC served as the lead agency for the consolidated plan process, providing a wealth of knowledge during the community engagement and data analysis processes. The projects and activities supported through this Annual Action Plan were selected based on the goals and priority areas established during the consolidated planning process.

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The Regional Housing Staff Advisory Committee served as the advisory body for the 2020-2024 Consolidated Plan. Members of this committee represent the City of Bloomington, Town of Normal, McLean County Regional Planning Commission, PATH (Continuum of Care), Bloomington Housing Authority, and the McLean County Behavioral Health Coordinating Council. This joint planning effort resulted in a robust outreach campaign that included citizens and stakeholders. Citizens were asked to participate by submitting a survey and attending a public meeting. Stakeholders were consulted via a written survey and several focus groups. Key informant interviews were also conducted. Consolidated Plan goals and priority needs were identified based on the results of the consultation efforts. The projects and activities identified in this 2022 Annual Action Plan were selected based on these goals and priority areas.

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))

Staff from the Community Enhancement Division participate in a variety of committees related to housing and other social service issues. CDBG funding from the City of Bloomington and the Town of Normal support community planning activities with the McLean County Regional Planning Commission.

As part of its COVID-19 Pandemic response efforts, the City actively participates in the McLean County Housing Assistance Coalition. The coalition brings together housing and service providers, local government staff, and other organizations to coordinate rent/mortgage and utility assistance for those affected by the pandemic. To date, service providers of the coalition have provided millions in assistance since the start of the COVID-19 Pandemic.

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.

PATH also assists the City with consolidated planning efforts. As the HMIS lead, PATH is able to provide data regarding the nature and scope of homelessness in the geographic area. The City works with other homeless service providers who receive a variety of governmental grants and private funding. Specifically, the CDBG program provides funding to PATH and Recycling Furniture for Families (RF4F) to support services for individuals experiencing homelessness or at-risk of becoming homeless. The CoC outreach team regularly visits locations unfit for human habitation known to be frequented by persons experiencing homelessness. Through these efforts, the team is able to better track homeless individuals, initiate relationships, assess needs, and help clients navigate local resources.

The first place most people go after leaving street living is emergency shelter. Shelters offer food, showers, clothing, and case management. The Salvation Army-Safe Harbor provides shelter for adult women and men. Home Sweet Home Ministries is the only family shelter in the county and will take individual men, women, and families with dependent children. The Crisis Nursery, a Children's Home and Aid program, provides emergency shelter to children from birth through six years of age. Project Oz specializes in assisting youth experiencing homelessness and provides immediate shelter to youth ages 10-22.

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 Emergency Services Grant (ESG) office charges the CoC with setting priorities for funding and to provide planning guidance to the regional ESG applicants. The CoC consults with ESG recipients to ensure that all applications are in alignment with funding requirements. ESG recipients submit the application to the CoC for approval. The CoC evaluates the merit of each proposal based on a preference for rapid re-housing, past performance, and relevance to the overall goals of the CoC strategic plan. Under performing organizations do not receive recommendation from the CoC for funding.

Once funding is successfully achieved, the recipients' performance is supervised through the project monitoring process, which includes an evaluation of progress towards goals, programmatic compliance, and financial review. If a compliance issue is discovered during monitoring, the CoC Board will discuss the issue with the recipient. A plan for corrective action is put in place and reviewed frequently to ensure progress towards compliance.

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

1	Agency/Group/Organization	PATH (Personal Assistance Telephone)
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	PATH provided extensive consultation on needs of the homeless population during program development. As the HMIS lead, PATH staff frequently review data to identify gaps in services. The City selects activities to help meet these needs.
2	Agency/Group/Organization	BLOOMINGTON HOUSING AUTHORITY
	Agency/Group/Organization Type	Housing PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment 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?	Both the City and Bloomington Housing Authority participate in the McLean County Housing Assistance Coalition, which focuses on addressing the housing needs of low-and moderate-income residents affected by the COVID-19 pandemic. Both organizations also serve on the McLean County Regional Housing Advisory Committee. One of the primary focus areas of the committee is to preserve the current affordable housing stock; including publicly supported housing.

3	Agency/Group/Organization	City of Bloomington - Parks and Public Works Departments
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-housing community development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Staff has worked with the Public Works Department to discuss sidewalk improvement needs and long-term planning. This consultation will continue throughout the 2020-2024 Consolidated Plan.
4	Agency/Group/Organization	WEST BLOOMINGTON REVITALIZATION PROJECT
	Agency/Group/Organization Type	Neighborhood Revitalization 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 the West Bloomington Revitalization Project (WBRP) to determine needs of the WBRP residents/area. The WBRP service area is within the Regeneration Area.
5	Agency/Group/Organization	McLean County Regional Planning Commission
	Agency/Group/Organization Type	Other government - County Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The McLean County Regional Planning Commission (MCRPC) was the lead organizer for the City's award-winning 2015-2035 Comprehensive Plan. MCRPC also served as the lead organization for the 2017 Regional Housing Study and development the 2020-2024 Consolidated Plan. All sources were utilized during development of this Annual Action Plan.
6	Agency/Group/Organization	Bloomington-Normal Water Reclamation District
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Public Infrastructure
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	City staff has started preliminary discussions with the Bloomington-Normal Water Reclamation District to discuss potential public infrastructure projects and how these projects would impact the metropolitan area's resiliency given the impact climate change. Further discussions will hopefully identify opportunities to leverage CDBG funding to ensure areas of the City with a majority of low-to-moderate income residents have quality water infrastructure.

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

No agency types were purposefully removed from the consultation process during development of this plan. However, the City is currently working on plans to have a conversation about how the City in general, and CDBG funding in particular, may expand broadband access for low-to-moderate income community members. We hope to have robust conversations during the program year covered by this Annual Action Plan.

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 achieve self-sufficiency. These goals align with the 2020-2024 Consolidated Plan.
BN Home Regional Housing Study	McLean County Regional Planning Commission	The BN Home Regional Housing Study addresses the preservation and development of affordable housing, a priority need identified in the 2020-2024 Consolidated Plan.
City of Bloomington Comprehensive Plan	City of Bloomington	The Comprehensive Plan focuses on housing, economic development, land use, transportation, health, community facilities, services, and other related topics. The Comprehensive Plan goals align closely with the 2020-2024 Consolidated Plan.
McLean County Community Health Needs Assessment	McLean County Health Department	The Community Health Needs Assessment provides data related to health and housing. Directing resources to improve the overall quality of the affordable housing stock is a priority goal of the 2020-2024 Consolidated Plan.
Bloomington Housing Authority Five Year PHA Plan	Bloomington Housing Authority	The 5-Year PHA Plan outlines the needs and priorities of the Bloomington Housing Authority. Addressing affordable housing is a priority goal of the 2020-2024 Consolidated Plan.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The consultation process undertaken during creation of the 2020-2024 Consolidated Plan was robust and provided residents and stakeholders opportunities to participate in multiple ways. Undertaking consultation through a regional approach offered many more opportunities to engage the community than the City staff could have managed internally. The consultation resulted in the goals and priority areas used to select activities supported through this Annual Action Plan.

The City will continue to investigate ways to leverage CDBG funding to build resiliency in public infrastructure and housing for low-to-moderate income residents. Additional long-term planning conversations with the City's Public Works Department, the Bloomington-Normal Water

Reclamation District, neighborhood and resident organizations representing low-to-moderate income community members, and other relevant partners will continue as the City prepares for the next Consolidated Plan.

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 of Bloomington adopted a new Citizen Participation Plan (CPP) in November 2018 and that plan was amended in 2020. The public comment period for this Annual Action Plan was from May 6, 2022 through June 9, 2022 with a public hearing held on May 9, 2022. No public comments were received during the public comment period.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	No public comments were made during the Public Hearing held on May 9, 2022 during the regularly scheduled City Council meeting. All City Council meetings and public hearings have accommodations provided by the City Clerk's Office. No such accommodations were requested.			
2	Newspaper Ad	Non-targeted/broad community	Notice of the public comment period and public hearing was published in the Pantagraph on April 22, 2022.			
3	Internet Outreach	Social Service Agencies	No comments received.			

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City will use Program Year 2022 CDBG entitlement funding, program income from previous housing rehabilitation activities, and un-used prior program year CDBG entitlement resources.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	535,422	30,100	295,342	860,864	1,102,560	Program income from rehabilitation loans is estimated using previous program year data. Prior year resources will come from unexpended CDBG entitlement funds from PY2018, PY2019, PY2020, and PY2021.
Other	public - federal	Economic Development Public Services	0	0	0	0	0	

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 will continue to leverage CDBG funding for housing rehabilitation to expand our footprint using Illinois Housing Development Authority (IHDA) funds. The source of that funding is IHDA's Single Family Rehabilitation program, which provides up to \$45,000 per unit for housing rehabilitation work (hard and soft costs). We anticipate completing 5-10 rehabilitation projects through this program in Program Year 2022.

The City receives funding to support maintenance, exterior repairs, and demolition at vacant, abandoned properties through an IHDA program as well. In 2020, IHDA announced a new program called Strong Communities Program (SCP) to help accomplish this work. The SCP program was a partner program to IHDA Abandoned Property Program (APP). Unfortunately, the APP program was ruled unconstitutional by the Illinois State Supreme Court in 2021 and the program was closed. The City will use a majority of the funds associated with SCP to accomplish demolition activities.

The City utilizes its CDBG public service dollars to support the Homeless Services program at Providing Access to Help (PATH). PATH utilizes these funds to meet the local match requirements of the Continuum of Care program. CDBG funds cover a portion of the salary and benefits for Homeless Services program staff.

Some CDBG housing rehabilitation funds will be used as match for the City's Lead Hazard Control program as well.

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

At any given time, the City owns several properties slated for demolition. Once cleared, the properties are typically donated to Habitat for Humanity, another non-profit organization, or a developer for in-fill development of affordable housing. When these properties do not meet the criteria for demolition, the property is donated to a local not-for-profit organization such as YouthBuild or Dreams Are Possible for rehabilitation and resale to an income-qualified household. The non-profit also has the option of renting to an income-qualified household. Non-buildable, vacant lots are donated to non-profits for use as green space.

Discussion

As with most communities, needs are always greater than available funding. The City will continue to collaborate with other local agencies to leverage funding in an attempt to address some of the most critical needs of the community. We will focus on programs and services that enhance the quality of life for low-to-moderate income residents. We will also continue to seek non-CDBG funding to meet the priority needs, as staffing allows.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Preservation of existing affordable housing stock.
	Goal Description	The City will undertake several programs designed to preserve the existing affordable housing stock throughout the 2022 Annual Action Plan. The City has several programs that will be offered to community members. Traditional housing rehabilitation work will be financed through 0% interest, deferred payment loans. Loans are typically capped at \$25,000 and include hard costs only. Soft costs will be mostly covered under rehabilitation service delivery. The City will also complete rehabilitation work on some properties that are a part of the Lead Hazard Control grant. This will be financed through grants to the homeowner. The City will also continue to its partnership with AMBUCS to build accessibility ramps during the 2022 Program Year. Water and sewer service costs will also be covered for lots that Habitat for Humanity owns and is building affordable housing units for low-to-moderate income households. Most of the work will take place in West Bloomington, but all eligible City residents can participate in these activities.

2	Goal Name	Elimination of slum and blight conditions.
	Goal Description	Demolition and clearance activities will be limited to residential properties. Rehabilitation is always considered before demolition, but most of the properties the City encounters are beyond the point where they can be rehabilitated. The City attempts to use vacant lots from demolition activities to create opportunities for affordable housing construction through Habitat for Humanity. Properties that do not meet Habitat's criteria may be offered to adjacent property owners or donated to local not-for-profits for green space. CDBG will be leveraged with other resources such as the Illinois Housing Development Authority's Strong Communities Program.
3	Goal Name	Support the provision of public service activities
	Goal Description	The City will support local non-profit organizations dedicated to providing services to low-to-moderate income residents and other special populations through the 2022 Program Year. Programs supported include PATH's Homeless Services and Emergency Grants program, the West Bloomington Revitalization Project, Recycling Furniture for Families, OSF Health Care's Peace Meal program, and KTB Financial. Services provided through these projects address the following high priority funding areas: homeless services, renter assistance, senior services, financial services, and programs for the WBRP target area.
4	Goal Name	Provide quality services and facilities.
	Goal Description	The City will address the provision of quality City services and public facilities through a security camera system installation for public housing, Americans with Disabilities Act improvements at the Mid-Central Community Action Agency, and a sidewalk project in the WBRP target area.
5	Goal Name	Administer CDBG effectively and proficiently.
	Goal Description	The City strives to improve the implementation and effectiveness of CDBG funded activities throughout the 2022 Program Year. Through the Administration and Planning goal, the City will support fair housing initiatives, Section 3 opportunities, regional housing planning efforts, and general administration of the CDBG program.

Projects

AP-35 Projects – 91.220(d)

Introduction

Activities were selected based on the relationship to the high priority funding areas identified in the 2020-2024 Consolidated Plan.

Projects

#	Project Name
1	Homeowner Housing Assistance
2	Rehabilitation Service Delivery
3	Residential Demolition
4	Public Services
5	Sidewalk Improvements
6	Non-Profit Building Improvements
7	CDBG General Administration
8	CDBG Administrative Programs
9	CDBG Planning
10	Public Housing Building Improvements

Table 7 - Project Information

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

The City selected these projects based on the needs and goals identified during the 2020-2024 Consolidated Plan process. These projects will support the needs of low-to-moderate income residents of the City and provide funding to address residents with unserved needs. The COVID-19 Pandemic and continued supply-chain related challenges hampered progress towards addressing underserved needs in the community, but the City worked to overcome these challenges as much as possible.

AP-38 Project Summary
Project Summary Information

1	Project Name	Homeowner Housing Assistance
	Target Area	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP
	Goals Supported	Preservation of existing affordable housing stock.
	Needs Addressed	Affordable Housing Preservation
	Funding	CDBG: \$355,000
	Description	Activities completed under this project will include moderate rehabilitation, accessibility improvements and facade improvements at owner-occupied housing units. Owners will meet income qualifications.
	Target Date	4/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Housing rehabilitation activities will be performed at housing units owned and/or occupied by income-qualified residents. The City typically completes 20-25 housing rehab activities under this project each year.
	Location Description	The homeowner rehabilitation program is open to all income-qualified residents in the City. Homeowner applications are accepted on a rolling cycle minus the roof replacement program. There is a waiting list at this time. All locations are to be determined.
Planned Activities	Housing rehabilitation requests vary depending on the specific needs. Work performed under this project can include roof, siding, door and window replacement; new soffit, fascia and gutters; new HVAC plumbing and electrical; and emergency water and sewer line replacement. Grants finance assistance for Lead Hazard Control match housing rehabilitation and AMBUCS rehabilitation activities. General rehabilitation assistance and roof replacement assistance activities are financed through zero percent interest, deferred payment loans or grants depending on the project.	
2	Project Name	Rehabilitation Service Delivery
	Target Area	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP
	Goals Supported	Preservation of existing affordable housing stock.
	Needs Addressed	Affordable Housing Preservation
	Funding	CDBG: \$33,000

	Description	This project will cover expenses related to the delivery of all rehabilitation programs performed under this Annual Action Plan. Expenses may include but not be limited to: staff expenses, training, postage, office supplies, advertising, printing, and environmental testing and clearance.
	Target Date	4/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project supports other projects/activities under the Preservation of Affordable Housing goal. Numbers will be reported on associated activities.
	Location Description	Locations identified under other projects.
	Planned Activities	No activities outside of Rehabilitation Service Delivery will occur under this project.
3	Project Name	Residential Demolition
	Target Area	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP
	Goals Supported	Elimination of slum and blight conditions.
	Needs Addressed	Affordable Housing Preservation
	Funding	CDBG: \$41,000
	Description	The City will address the elimination of slum and blight conditions throughout this Annual Action Plan. Demolition and clearance activities will be limited to residential properties. Rehabilitation is always considered before demolition, but most of the properties the City encounters are beyond the point where they can be rehabilitated. The City attempts to use vacant lots from demolition activities to create opportunities for affordable housing construction through Habitat for Humanity. Properties that do not meet Habitat's criteria may be offered to adjacent property owners or donated to local not-for-profits for green space.
	Target Date	4/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	The estimated demolition activities will result in new housing construction through the City's partnership with Habitat for Humanity. Habitat's homeowner program is limited to households at or below 50% Area Median Income.
	Location Description	To be determined.

	Planned Activities	Demolition and clearance activities at three vacant/abandoned properties. Each property will be connected to City water and sewer services as necessary.
4	Project Name	Public Services
	Target Area	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP
	Goals Supported	Support the provision of public service activities
	Needs Addressed	Homeless Services Senior Services Youth Services
	Funding	CDBG: \$82,500
	Description	The City will support local non-profit organizations dedicated to providing services to low-to-moderate income residents and other special populations through the 2022 Program Year.
	Target Date	4/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	More than 1300 families will benefit from the other services provided through this project.
Location Description	Most of the services will occur at the individual agencies. However, some services, such as Homeless Services, are provided on location. Agency locations are below: 201 E. Grove St, Bloomington 515 N. Center, Bloomington 724 W. Washington, Bloomington 1003 Maple Hill Rd, Bloomington (Peace Meals Bloomington Kitchen) 1301 W. Washington	

	Planned Activities	Homeless services will be supported through grants to PATH's Homeless Services and Emergency Services programs and Recycling Furniture for Families. Peace Meals services in-home delivered, congregate meals, and case management for seniors. WBRP provides a wide variety of services for West Bloomington residents, including The Tool Library, Bike Co-op, Veggie Oasis, community workshops and community gardens. KTB Financial assists low-to-moderate income households with services geared towards financial security and self-sufficiency.
5	Project Name	Sidewalk Improvements
	Target Area	WBRP Service Area
	Goals Supported	Provide quality services and facilities.
	Needs Addressed	Sidewalk Improvements
	Funding	CDBG: \$184,000
	Description	This project will support sidewalk improvements in the WBRP service area.
	Target Date	4/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	The sidewalks in this area connect area residents to jobs and services throughout the Bloomington-Normal community. Many public transportation routes stop along this area.
	Location Description	This activity will provide sidewalk improvements on West Market Street and on West Front Street.
Planned Activities	This activity will provide sidewalk improvements on West Market Street and on West Front Street in the WBRP service area.	
6	Project Name	Non-Profit Building Improvements
	Target Area	LMA Preservation Area WBRP Service Area
	Goals Supported	Provide quality services and facilities.
	Needs Addressed	Crime Prevention and Awareness Accessibility Improvements
	Funding	CDBG: \$30,000
	Description	This project will support ADA improvements at the Mid-Central Community Action Agency (MCCA) facility.

	Target Date	4/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 224 residents ADA improvements at MCCA.
	Location Description	The MCCA activity will take place at 1301 West Washington Street.
	Planned Activities	The MCCA ADA improvements will provide updated ADA compliant doors to increase the wellbeing of low-to-moderate income clients with disabilities seeking services with MCCA.
7	Project Name	CDBG General Administration
	Target Area	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP
	Goals Supported	Administer CDBG effectively and proficiently.
	Needs Addressed	Crime Prevention and Awareness Housing Discrimination Services Renter Assistance Senior Services Accessibility Improvements Affordable Housing Preservation Sidewalk Improvements
	Funding	CDBG: \$30,300
	Description	This project will support general administration of the CDBG program throughout this Annual Action Plan. Expenses may include but not be limited to: staff expenses, training, postage, office supplies, grants management software, advertising and postage.
	Target Date	4/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Program beneficiaries will be reported under other projects.
	Location Description	Administrative activities will occur within the Economic and Community Development Department, located at 115 E. Washington St., Bloomington, IL 61702.
	Planned Activities	Grant administration will be the only activity under this project.
	Project Name	CDBG Administrative Programs

8	Target Area	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP
	Goals Supported	Administer CDBG effectively and proficiently.
	Needs Addressed	Job Training and Workforce Development Housing Discrimination Services
	Funding	CDBG: \$25,000The C
	Description	This project will support programs addressing administrative requirements of the CDBG program such as fair housing and Section 3 training.
	Target Date	4/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project will support activities benefiting 50 low-to-moderate income residents. The majority will be renters.
	Location Description	Fair housing services will be offered through Prairie State Legal Services' Bloomington office at 201 W. Olive St. Section 3 training opportunities for public housing residents will be provided at locations that will be determined at a future date.
Planned Activities	The City will partner with the Bloomington Housing Authority to offer a series of job- and life-skills training opportunities and a job fair for public housing and Housing Choice Voucher Program participants. Prairie State Legal Services will be the lead agency on a fair housing program, which will include a housing discrimination testing program.	
9	Project Name	CDBG Planning
	Target Area	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP
	Goals Supported	Preservation of existing affordable housing stock.
	Needs Addressed	Affordable Housing Preservation
	Funding	CDBG: \$36,000
	Description	This project will support planning for regional housing initiatives and other projects supported through this Annual Action Plan.
	Target Date	4/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	McLean County Regional Planning Commission, 115 E. Washington St, Bloomington, IL
	Planned Activities	McLean County Regional Planning Commission (MCRPC) will serve as the lead agency for the Regional Housing Staff Advisory Committee. MCRPC will coordinate the Affordable and Supportive Housing Committee; serve as the hub for regional housing data through the Housing Dashboard; educate policymakers, stakeholders and the general public on affordable housing issues through a series of whitepapers; assist with Consolidated Plan implementation; and support City staff with housing initiatives, as request.
10	Project Name	Public Housing Building Improvements
	Target Area	LMA Preservation Area WBRP Service Area
	Goals Supported	Provide quality services and facilities.
	Needs Addressed	Crime Prevention and Awareness
	Funding	CDBG: \$44,064
	Description	This project will support the installation of security cameras at the Bloomington Housing Authority's Irvin Apartments.
	Target Date	4/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 26 residents will benefit from this improvement.
	Location Description	This activity will take place at 823 West Oakland Street and 810 West Jackson Street (Irvin Apartments).
	Planned Activities	Security camera installation at Irvin Apartments will assist Bloomington Housing Authority staff resolve complaints and ensure compliance with behavior standards. This will also assist law enforcement gather evidence in cases of criminal activity.

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

West Bloomington has a higher concentration of low-income and minority households than many other areas within the City. Infrastructure is aging and in need of replacement.

Geographic Distribution

Target Area	Percentage of Funds
LMA Preservation Area	34
WBRP Service Area	64
LMA Regeneration Area - Outside WBRP	2

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

During the outreach process conducted for the development of the 2020-2024 Consolidated Plan, West Bloomington was identified as the area most in need of revitalization. The WBRP Service Area encompasses a smaller target area formerly identified as the City's designated slum/blight area.

Discussion

The distribution of funds between the WBRP Service Area and LMA Regeneration Area - Outside WBRP may vary depending on the locations of housing rehabilitation projects. A small portion of funding will be spent in the Preservation Areas as the needs are not as significant.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Although CDBG cannot be used for new construction, the City will support affordable housing preservation through several of the projects identified in this Annual Action Plan.

One Year Goals for the Number of Households to be Supported	
Homeless	5
Non-Homeless	0
Special-Needs	0
Total	5

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	2
Rehab of Existing Units	22
Acquisition of Existing Units	0
Total	24

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

Discussion

The total number of households supported through this Annual Action Plan are based on the estimated numbers served through the following projects:

New Habitat for Humanity Single-Family Homes: 2 Units

Homeowner Assistance (Single-Family Housing Rehabilitation): 22 Units

AP-60 Public Housing – 91.220(h)

Introduction

The Bloomington Housing Authority is committed to providing quality housing and services to its public housing and Housing Choice Voucher Program residents.

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

CDBG funds will be provided to the Bloomington Housing Authority to install security cameras at the Irvin Apartments.

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

The Housing Authority provides several ongoing opportunities for resident involvement. The Housing Authority has a resident services department. Resident engagement is a significant part of this department's responsibilities.

The resident services department facilitates BHA-sponsored events such as a Health and Resource Fair, on-site employment and job-readiness training, and after-school tutoring in two different computer labs at public housing sites. In addition to offering specific "in-house" resources, the Housing Authority collaborates with local partners on multiple events. These activities are opportunities for engagement in the Bloomington-Normal community, building ties among neighbors, and promoting self-advocacy. With a full-time elderly service coordinator staffed at Wood Hill Towers, elderly, disabled, and near-elderly residents have even more opportunities for resident involvement in social and community-oriented activities.

The Housing Authority is required to convene a Resident Advisory Board each year as part of the process in adopting its annual PHA plan. A public hearing is also conducted as part of this process, and it is well attended by residents, who offer their feedback and suggestions on Housing Authority goals, objectives, and programming for the coming years.

The City provides funding for Section 3 activities that support basic financial and employment education. This reflects the City's commitment to supporting the fundamental building blocks of homeownership for public housing residents. Without a stable financial and employment foundation, homeownership is less likely to be a successful endeavor. Our hope is that this fundamental approach that helps stabilize income and financial matters will enable successful homeownership for public housing residents.

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

provided or other assistance

The Bloomington Housing Authority is not designated as “troubled.”

Discussion

The City has a long-standing partnership with the Bloomington Housing Authority. Both organizations are members of the Regional Housing Advisory Staff Committee. The City has utilized CDBG for many years to fund job and life-skills training for public housing and Housing Choice Voucher residents and to support improvements to public housing buildings. These activities will continue during this Annual Action Plan.

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 City is the fiscal agent while PATH provides Continuum coordination, HMIS management and direct services. The Continuum of Care seeks to address the current homeless client base as well as any additional demands on the homeless system.

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

Through the Homeless Services CDBG program with the City of Bloomington, PATH reaches out to individuals and families experiencing homelessness that are unsheltered and in emergency shelters. Annually, the goal is to come in contact and assist 200 individuals and families per year. This involves making referrals to other agencies in the community and helping clients obtain work clothing once employment has been verified. Additionally, 80 people per year will get housing information and guidance. PATH keeps an up-to-date list of rental units in the community, which we are able to provide to clients that have an income and saving some money, especially when at an emergency shelter. While we talk about housing issues with all clients, at certain times we are able to be more specific about housing information guidance for those that are closer to becoming housed. Other actions from PATH's outreach team are to determine the barriers and challenges faced by unsheltered clients and provide this information to the CoC. This helps determine if and how services should take these factors into account.

Addressing the emergency shelter and transitional housing needs of homeless persons

Consumer Surveys at emergency shelters and transitional housing projects are an important way to get information about the needs of clients. Needs are also identified during case management. The Consumer Survey has been updated and was implemented during the 2020 Program Year. Annually, the emergency shelters' goals are to provide effective case management to all clients staying at their shelter. The goals in case management vary as the specific needs of clients vary but nearly always include referral to services and public benefits. Anyone experiencing homelessness in emergency shelter or transitional housing may receive assistance from PATH's outreach team. This team also helps connect clients with resources and benefits. Staff continue to recruit non-ESG and/or CoC funded agencies to engage with the CoC. This would allow the CoC to determine the specific needs of their clients and have a more accurate and complete picture about the needs of those in transitional housing.

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

A current goal of the CoC is to get more programs that are not mandated to follow the Coordinated Entry (CE) to participate in our system. For example, there are several transitional housing programs that are not CoC or ESG funded that do not pull from the CE Prioritization List. The goal is to get them to participate at a minimum level first. This means that they have access to the Prioritization List but can choose whether or not to use it. Having greater participation in the CE system can help the CoC house those identified as most vulnerable much faster. Currently, the CE system is hampered by the lack of housing opportunities to which referrals can be made. The Central Illinois CoC also plans on improving its System Performance Measures, as part of their Strategic Plan. This would provide data to better understand how and where improvements are needed in service delivery.

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.

The goal of all CoC and ESG funded activities is to connect clients to appropriate services. If they enter into the CE system at the wrong place, they are given a referral to connect with the right resources for their given needs. That may be a referral to the Salvation Army, PATH's Homeless Services, or PATH's 211 call center. Our current goal in the CoC is to strengthen our partnerships with agencies that discharge clients (e.g., health care facilities, mental health, corrections). Currently, those referrals are made from discharging institutions, but a greater effort is being made to get them knowledgeable about CoC policy and to find gaps in services or determine if certain referrals are not successful.

Discussion

The Central Illinois CoC, like many other organizations, is going through staff transitions. These staff changes coupled with staff changes at the City will enable new partnerships to be built and lead to a re-evaluation of current operating practices. The City will continue to work with the Central Illinois CoC to determine how to best use funding to help alleviate and end homelessness in the Bloomington-Normal area.

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

Introduction:

The City strives to eliminate barriers to affordable housing throughout this Annual Action Plan and beyond. Affordable housing issues are addressed throughout several projects to be implemented during the 2020-2024 Consolidated Plan period. Staff will continue to seek new opportunities beyond those discussed below.

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 operates homeowner housing rehabilitation programs for low- and moderate-income residents. These programs help homeowners complete critical repairs to their homes. Many homeowners can afford their regular monthly expenses but are unable to pay for large ticket items. By offering 0% interest terms under deferred payment loans or grants, homeowners can maintain the affordability of their current housing.

The City waives all building permit and inspection fees for any non-profit organization building or rehabilitating affordable housing for low- and moderate-income residents. This policy extends to all private contractors performing rehabilitation work under CDBG- or IHDA-funded projects.

In August 2015, the City of Bloomington adopted its current Comprehensive Plan with goals aimed at reducing barriers to affordable housing. While the Plan is not policy, it serves as a guide for policy decisions. The Comprehensive Plan encourages future infill development opportunities and provides a tiered system for prioritizing development.

The Regional Housing Staff Committee also monitors and encourages the Low Income Housing Tax Credit (LIHTC) tool as an option for developers. This committee provides continual updates on the number of units supported through this program to City staff as well.

Discussion:

The City will continue to look at policy changes and other programs than can further reduce barriers to affordable housing.

AP-85 Other Actions – 91.220(k)

Introduction:

The City endeavors to plan its annual program based on how to best meet the needs of the community while staying within the federal regulations for the Community Development Block Grant. When services are needed but cannot be provided directly by the City, partnerships are created/maintained to ensure the services are available to those most in need.

Actions planned to address obstacles to meeting underserved needs

The City attempts to maximize its funding to public services so that as many agencies serving vulnerable populations as possible are supported. Staff continue to look for funding resources outside of CDBG to further address the needs of special populations such as disabled and elderly homeowners. The 2020-2024 Consolidated Plan and this Annual Action Plan make resources for West Bloomington residents a priority. Having said that, there is clearly a need for public services that is beyond the capacity of our CDBG program or the City as a whole. Additional investments from sources outside of the Bloomington-Normal community would be required to eliminate obstacles to meeting the needs of the underserved.

Staff will continue to serve on committees and work groups that address the housing needs of low-to-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 as well.

The John M. Scott Health Care Trust provides funding to local service providers to ensure individuals without adequate, affordable healthcare have access to quality health services. Serving as Staff Administrator for the Commission is a part of the Grants Coordinator job duties. The Staff Administrator serves as a liaison between the John M. Scott Commission and the City in addition to operating the grants program offered by the Trust. The Bloomington City Council serves as the Trustee of the Trust. In the City's Fiscal Year 2023, which runs parallel to the CDBG Program Year, the Trust will invest nearly one million dollars into the community through grants to local organizations that provide health care services to underserved community members within McLean County.

Actions planned to foster and maintain affordable housing

Preservation of the existing affordable housing stock and the creation of new affordable housing through demolition and clearance are high priorities identified within this Annual Action Plan. In fact, nearly 50% of funding will be dedicated to these projects. Additionally, the City will continue its participation in the Regional Housing Staff Advisory Committee and the Affordable and Supportive Housing Committee. One of the continuing initiatives of the Regional Housing Staff Advisory Committee is to inventory all income-qualified housing in McLean County and track contract expiration dates. These units are a significant portion of the affordable housing stock, especially for those households with extremely low and low incomes. Additionally, these committees have begun to explore how land use

policy changes can encourage development, including affordable housing development, in established neighborhoods within the City through infill development.

Actions planned to reduce lead-based paint hazards

All CDBG contractors are required to maintain Renovation, Repair and Painting (RRP) certification. The City offers all CDBG approved contractors the opportunity to attend the RRP certification training every five years at no cost to the contractor. A training was held in April 2021 resulting in 26 new/renewed certifications. The next training will be held in April 2025. Additionally, the City's Rehab Specialist will maintain all necessary licenses and certifications to ensure that lead-based paint safety practices and regulations are being strictly adhered to on all CDBG projects. The City also has funding from the HUD Lead-Based Paint Hazard Control and Healthy Housing grant program. The period of performance for the grant started on January 4, 2021. It is a 42 month program that will address lead and health hazards in approximately 92 owner-occupied and rental housing units. Unfortunately, staff transitions and continued hurdles from the COVID-19 Pandemic have continued to delay the initial start of lead hazard reduction work.

Actions planned to reduce the number of poverty-level families

The City will continue to support the Bloomington Housing Authority's job and life-skills training program annually. The program offers job training and a job fair each year for public housing residents and Housing Choice Voucher recipients. Past training topics have included Microsoft Office Suite, how to write a resume, interview skills, and money management and budgeting. The training(s) and job fair are designed to foster job and life skills required for the local workforce and increase facetime with the businesses most likely to employ individuals with those skills.

Homeownership is traditionally the greatest source of an individual's wealth. The City's Homeowner Rehabilitation Program provides low-to-moderate income homeowners the opportunity to preserve their greatest asset. Income-qualified households can receive assistance through a 0% interest, five year forgivable loans or grants depending on the type of project. The City also offers housing rehabilitation through the Illinois Housing Development Authority's (IHDA) Single Family Rehabilitation program. Through this program, homeowners can receive up to \$45,000 in assistance through a 5-year forgivable loan.

Actions planned to develop institutional structure

With a variety of staff transitions at key local organizations, City staff has, and will continue, to build partnerships to better serve the community. Outside of the committees associated with the McLean County Regional Planning Commission, the City continues to be a member of the Invest Health Team. This team was formed to look at the built environment and how it affects the health and well-being of City residents. Additionally, the City is currently building partnerships with organizations, such as the

Bloomington-Normal Water Reclamation District, to discuss long-term public infrastructure strategies, goals, and plans.

Through the John M. Scott Trust grant program, the City continues to build strong partnerships with community organizations serving underserved community members. A multitude of local organizations are funded each year with this program. Grants are awarded for general health care operations, capital improvements, and health care programs.

Staff will continue to foster new partnerships that will improve the institutional delivery structure of CDBG and the priorities identified in the 2020-2024 Consolidated Plan.

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

The City will continue to support the McLean County Continuum of Care, which consists of representatives from social service agencies and public housing. As a member of the Regional Housing Staff Advisory Committee, the City participates in a variety of initiatives designed to increase communication between all types of housing and service providers.

Discussion:

The City will continue to seek additional funding to support local programs in ways that CDBG is unable to do so. Interagency collaboration has been referenced throughout this Plan and will remain a key component of the City's strategy to meet the needs of the community.

Program Specific Requirements

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

Introduction:

The City makes every attempt to utilize program income within the same program year it is received. Section AP-15 Expected Resources Table 5 shows \$30,000 in estimated program income, which has been budgeted to projects within this Annual Action Plan. Program income comes from the repayment of loans made available through the City's CDBG housing rehabilitation program.

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.	80.00%

No new funding to meet urgent needs has been allocated in this Annual Action Plan.

