

## **CR-05 - Goals and Outcomes**

### **Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)**

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The City conducted a variety of community development activities in Program Year 2023 (May 1, 2023- April 30, 2024) designed to meet the needs of low and moderate income community members. Activities focused on the following areas.

1. Rehabilitation of single-family, owner-occupied housing (8 units)
2. Accessibility ramps for single-family, owner-occupied housing unit (1 unit)
3. Water-Sewer service for new affordable residential housing unit (1 unit)
4. Demolition of a blighted and deteriorated residential housing structure (1 unit)
5. Public service projects (6)
6. Public facility improvement (1)
7. Public infrastructure improvement (1)
8. Section 3 job training (1)
9. Fair housing program (1)
10. Community planning program (1)

### **Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and**

**explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Administer CDBG effectively and proficiently.	Affordable Housing Public Housing Non-Housing Community Development	CDBG: \$	Other	Other	0	0				
COVID-19 Prevention, Preparation, and Response	Affordable Housing Business Support/Economic Development	CDBG: \$ / CDBG-CV: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25	191	764.00%			
COVID-19 Prevention, Preparation, and Response	Affordable Housing Business Support/Economic Development	CDBG: \$ / CDBG-CV: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	125	176	140.80%			
COVID-19 Prevention, Preparation, and Response	Affordable Housing Business Support/Economic Development	CDBG: \$ / CDBG-CV: \$	Homeless Person Overnight Shelter	Persons Assisted	25	105	420.00%			

COVID-19 Prevention, Preparation, and Response	Affordable Housing Business Support/Economic Development	CDBG: \$ / CDBG-CV: \$	Homelessness Prevention	Persons Assisted	0	86				
COVID-19 Prevention, Preparation, and Response	Affordable Housing Business Support/Economic Development	CDBG: \$ / CDBG-CV: \$	Jobs created/retained	Jobs	0	60				
COVID-19 Prevention, Preparation, and Response	Affordable Housing Business Support/Economic Development	CDBG: \$ / CDBG-CV: \$	Businesses assisted	Businesses Assisted	30	60	200.00%			
Elimination of slum and blight conditions.	Affordable Housing Non-Housing Community Development	CDBG: \$	Homeowner Housing Added	Household Housing Unit	15	4	26.67%			
Elimination of slum and blight conditions.	Affordable Housing Non-Housing Community Development	CDBG: \$	Buildings Demolished	Buildings	5	5	100.00%	1	1	100.00%
Preservation of existing affordable housing stock.	Affordable Housing Public Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	35	62	177.14%			
Preservation of existing affordable housing stock.	Affordable Housing Public Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	100	54	54.00%	14	9	64.29%

Provide quality services and facilities.	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3000	8715	290.50%	1621	2887	178.10%
Support the provision of public service activities	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	9488	189.76%	1400	1765	126.07%
Support the provision of public service activities	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	276				
Support the provision of public service activities	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homelessness Prevention	Persons Assisted	1500	1702	113.47%			

**Table 1 - Accomplishments – Program Year & Strategic Plan to Date**

**Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan,**

**giving special attention to the highest priority activities identified.**

**Housing Rehabilitation Activities**

The City used CDBG funding to support rehabilitation and accessibility improvements on nine (9) residential owner-occupied, single-family housing units during Program Year 2023. Eight (8) of the projects completed were through the City's zero percent (0%) interest deferred payment loan program. One (1) household received a grant for an accessibility ramp through the City's partnership with Cornbelt AMBUCS. Additionally, water and sewer service for one (1) new affordable housing unit was completed in the program year. Habitat for Humanity of McLean County will work to construct the new affordable housing unit on the parcel. The housing rehabilitation activities helped alleviate health, safety, accessibility, and code violations on properties throughout the community. In total, \$334,539.89 was spent during Program Year 2023 on housing rehabilitation activities.

**Demolition Activities**

During Program Year 2023, the City demolished one (1) structure with CDBG funds. The now vacant parcel will be used to construct a new unit of affordable housing. In total, \$20,811.15 was spent on CDBG housing demolition activities during the program year.

**Public Facility and Infrastructure Activities**

The City used CDBG funding to support one (1) public facility improvement activity and one (1) public infrastructure project during the program year. The public facility improvement activity supported Americans with Disabilities Act (ADA) improvements and a retaining wall improvement for Mid-Central Community Action (MCCA). During Program Year 2023, the City also finished the Program Year 2022 sidewalk project on the City's West side. The sidewalk improvement project slated for Program Year 2023 was delayed due to the timing of the annual entitlement funding for Program Year 2023 and limitations on construction during the winter months. The Program Year 2023 sidewalk improvement project is likely to be completed in Program Year 2024. In total, \$207,388.09 was spent during Program Year 2023 on public facility and infrastructure activities.

**Administrative, Fair Housing, Section Three Training, and Community Planning Activities**

The City continued the partnership with Prairie State Legal Services (PSLS) to provide fair housing services to income qualified Bloomington community members. This partnership underscores the City's commitment to affirmatively furthering fair housing. In Program Year 2023,

PSLS completed intake services and legal representation services, if needed, for community members facing housing discrimination or other unlawful practices. Additionally, PSLS conducted fair housing tests throughout the community to take a proactive approach to eliminating unfair housing practices. Twenty-one (21) outreach events were also held by PSLS during the program year. The City also funded Section Three job training opportunities in partnership with the Housing Authority of the City of Bloomington. This included a job and community resource fair and a career and self-sufficiency training. The City's partnership with the McLean County Regional Planning Commission (MCRPC) continued as community partners engaged in fruitful discussions and research through the Housing Staff Committee and Affordable and Supportive Housing Committee. MCRPC also has continued to provide high quality research that will be incredibly important for future planning, including the next five-year consolidated plan process that began in Program Year 2023. Additional funds were used to support administrative needs to run the various CDBG activities in the program year. In total, \$53,425.89 was spent in Program Year 2023 to support community planning, Section Three, and fair housing activities. An additional \$21,576.01 was spent in Program Year 2023 for general administration of the CDBG program.

### **Public Services**

Activities that support public services are a critical piece of the community's social service infrastructure. In Program Year 2023, six (6) public service activities were funded by the City's CDBG program. The Peace Meals program operated by the OSF Healthcare System served 1,212 community members by providing meals and nutrition services to seniors. Of the people served with the Peace Meal program, over ninety-five percent (95%) community members served reported they can continue living in their homes, in part, because of this service. The West Bloomington Revitalization Project (WBRP) served 596 community members with a variety of community programs. Programs include a Bicycle Co-Op that supports community members traveling to work and increasing their well-being, a tool library where clients can rent tools to maintain their homes, and a bed blitz that builds bed frames for community members in need. Partners for Community served 231 community members through their Recycling Furniture for Families program in the program year. This program assists community members acquire housewares and home furnishings. KTB Financial Services, Inc. served 118 community members and helped them avoid homelessness, improve food security, receive medical care, and prevent fraud against vulnerable community members. KTB Financial Services Inc. serves disabled and elderly community members. PATH served 68 community members in the program year between homeless and emergency services. In total, \$67,586.82 was spent during Program Year 2023 for public service activities.

## CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG
White	1,158
Black or African American	1,236
Asian	45
American Indian or American Native	32
Native Hawaiian or Other Pacific Islander	11
<b>Total</b>	<b>2,482</b>
Hispanic	210
Not Hispanic	2,449

**Table 2 – Table of assistance to racial and ethnic populations by source of funds**

### Narrative

Data populated into this table has been adjusted to reflect the information found in PR-23 report. The total served should be 2,659 community members based on the PR-23 report. Of that number 210 community members were of Hispanic ethnicity. In addition to the race categories above, the following categories were represented on the PR-23 report: American Indian/Alaskan Native and White, Black/African American and White, American Indian/Alaskan Native & Black/African-American, and other multi-race.

## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	708,282	714,528

Table 3 - Resources Made Available

### Narrative

The City once again increased CDBG expenditures beyond the annual allocation in Program Year 2023 to spend down carry-over funds from previous program years. Program Years 2020 and 2021 were significantly impacted by the COVID-19 Pandemic and this impact lowered CDBG spending in those years. To ensure compliance with 24 CFR 570.902, the City must maintain no more than 1.5 times the entitlement grant amount for the current program year available to draw. Lower CDBG spending in Program Years 2020 and 2021 increased the level of carry-over funds beyond the limit set by 24 CFR 570.902. During this program year, the City's CDBG spending was enough to meet the requirements in 24 CFR 570.902.

The \$714,527.85 includes Program Year 2022 public infrastructure improvement activities that were delayed. Currently, an additional \$90,000.00 allocated from the Program Year 2023 Annual Action Plan is expected to be spent in Program Year 2024 due to delays in receiving CDBG funds from HUD and local weather constraints.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
LMA Preservation Area	10	33	
LMA Regeneration Area - Outside WBRP	30	33	
WBRP Service Area	60	22	

Table 4 – Identify the geographic distribution and location of investments

### Narrative

Eligibility for all CDBG programs is based on income, national objective criteria, other applicable Federal regulations, and other program requirements. The City does not restrict funds based on geography within the City's corporate boundaries, so estimating percentage of the allocation is difficult. The target area information is based on City single-family residential housing rehabilitation activities. One (1) of the single-family housing rehabilitation projects occurred outside of the target areas listed above, which is why the total does not equal one hundred percent (100%). The WBRP service area is within the City's regeneration area. Estimating the geographic distribution of housing rehabilitation services in the



Annual Action Plan is extremely difficult given the City does not have geographic constraints on the housing rehabilitation program outside of the requirement to be within the corporate boundaries of the City.

Properties that are unfit for rehabilitation are typically demolished using CDBG or other state funding sources. After the structure is demolished, the City owned land, if buildable, is then provided to Habitat for Humanity for the construction of new affordable housing stock. The City does not operate a land bank or trust but makes an effort to make City owned land zoned for residential purposes available for new affordable housing development.

## Leveraging

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

The City of Bloomington Economic and Community Development Department continues to seek ways to leverage resources to increase or enhance the level of services it provides to low-to-moderate income community members. Primary constraints are related to financial, contractor, and staff resources. Staff will continue to seek partnerships and opportunities that allow for additional service or better services for the community. In Program Year 2023, the City leveraged funding from Illinois Housing Development Authority (IHDA) Home Repair and Accessibility Program (HRAP). The IHDA HRAP program supports housing rehabilitation on owner-occupied single-family homes.

The City also is the Trustee of the John M. Scott Trust, which provides grants to health care and social service organizations to meet the health care needs of residents in McLean County. This trust is administered by an eleven (11) member commission and the Community Enhancement Division's Grants Coordinator. During this program year the Trust provided over \$700,000 in grants to organizations. This program in addition to CDBG public service spending continue to be important aspects of the community's social service infrastructure.

The City was awarded a 2.3 million dollar Lead-Based Paint Hazard Reduction Program and Healthy Homes grant in 2020. This grant will allow for the abatement of lead-based paint hazards in approximately 92 housing units. Delays in program implementation have come from continued challenges related to the COVID-19 Pandemic, contractor availability, and staff changes. These challenges continued in part of Program Year 2023, but the program became operational after a two and a half year delay in Program Year 2023. This grant was provided a year extension to serve community members into 2025.

American Rescue Plan Act (ARPA) funds provided to the City were used for a variety of socio-economic needs including housing rehabilitation and non-profit grants. The ARPA housing rehabilitation program provides grants up to \$45,000 for health, life, safety, and code compliance issues in housing units with households at or below 80% of the Area Median Income (AMI).

## CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	15	10
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>15</b>	<b>10</b>

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	3	0
Number of households supported through Rehab of Existing Units	12	10
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>15</b>	<b>10</b>

Table 6 – Number of Households Supported

**Discuss the difference between goals and outcomes and problems encountered in meeting these goals.**

The City's Lead-Based Paint Hazard Reduction Program (LBPHRP) became operational in Program Year 2023. However, none of the projects completed in the program year required or utilized CDBG match for lead abatement activities as initially thought. This lowered the number of housing rehabilitation activities that used CDBG funds during the program year. While the City has enough general contractors to complete the projected level of housing rehabilitation projects in a program year, contractor

recruitment is still an issue. Contractor availability is a national issue, but particularly acute in McLean County due to increased development within the county.

Delays in the transfer of the deeds and new construction led to a lower than expected total of new housing units constructed through the City's partnership with Habitat of Humanity of McLean County. Issues related to the deed transfer have been solved and these parcels will likely begin construction in Program Year 2024.

**Discuss how these outcomes will impact future annual action plans.**

The City considered the factors listed above when drafting the Program Year 2024 Annual Action Plan. Goals are continually evaluated to reflect the issues discussed in the previous section. The City engaged in extensive marketing efforts for the Lead-Based Paint Hazard Reduction Program (LBPHRP), which will hopefully lead to projects that require CDBG match. For plans beyond Program Year 2024, the 2025-2029 Consolidated Plan creation will guide future goals and priorities.

**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	4	0
Low-income	2	0
Moderate-income	3	0
<b>Total</b>	<b>9</b>	<b>0</b>

**Table 7 – Number of Households Served**

**Narrative Information**

Although the City does not utilize CDBG funding to support the construction of affordable housing directly, the City does donate cleared lots, that are buildable, from demolition activities to Habitat for Humanity for the development of affordable housing. These efforts are enhanced by CDBG activities that add water and sewer service to the parcels. Additionally, the City devotes a significant amount of annual CDBG funding to the preservation of affordable housing through housing rehabilitation projects. Of the housing rehabilitation projects completed, three (3) were at or below 80% AMI, two (2) were at or below 50% AMI, and four (4) were at or below 30% AMI.

The City continues to address worst case needs through the single-family housing rehabilitation program funded by CDBG. The rehabilitation program addresses many structures with serious code violations that present health, life, and safety issues for our community members. Disabled or elderly community members have been served through the City's partnership with AMBUCS, which builds accessibility

ramps for these community members in owner-occupied single-family housing units. CDBG funds pay for the material and AMBUCS volunteers provide the labor to build the ramps.

Of the ten (10) units listed under non-homeless supported and rehab of existing units, eight (8) were traditional housing rehabilitation activities, one (1) was an AMBUCS accessibility rehabilitation activity, and one (1) was the installation of water and sewer service to support a new unit of affordable housing.

## **CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)**

**Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:**

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

During Program Year 2023, the City provided funding to PATH, Inc. for emergency and homeless services. This funding supported PATH's efforts to assess unhoused community members, provide case management, and provide rent and utility assistance.

The City has continued a partnership with PATH to meet the needs of homeless community members, but PATH has faced a series of organizational changes and challenges that have impacted performance in a negative manner. Issues with PATH intensified in Program Year 2023 and PATH has not been able to function as the CCoC lead agency during Program Year 2023. During Program Year 2023, City staff provided technical assistance to multiple new employees related to the agency's homeless services division. However, persistent staff changes continued through the program year. The City communicated concerns and issues to HUD regarding the CCoC given the importance of the CCoC and the services provided to homeless community members in Bloomington. HUD, the City, and other partners continue to work together to find solutions and fix issues with the function of the CCoC.

Public service funding to KTB Financial Services, Inc. also provided critical funding to vulnerable community members through housing and financial services. These services help many community members served by KTB stay housed and avoid homelessness.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The Salvation Army Safe Harbor Shelter provides emergency shelter and services for adult women and men who are experiencing homelessness. Safe Harbor provides case management services, a day center and meals. Showers, washer/dryers, and other amenities are offered to people through the day center when they may not meet the shelter's guidelines for bed space. Safe Harbor also has an employment program on site and provides transportation for job interviews. The Salvation Army's shelter is a strong partner in the Coordinated Point of Entry that helps move people from a shelter setting into permanent housing.

Home Sweet Home Ministries (HSHM), another member of the CCoC, provides emergency shelter for adult women and men as well as families. There are limitations; families are generally separated to a men's side and a women's side, but it is the result of the layout of the facility. The program has been in place for over a century. The shelter provides Rapid Re-Housing (RRH) services and has had considerable success in moving people from the shelter into a home. RRH helps to solve the problem of separating families in the shelter facility. During Program Year 2023, a tent encampment for unhoused community

members formed near HSHM. The City along with various non-profit partners are working diligently to ensure these community members received services and can find housing. HSHM will be a Program Year 2024 CDBG subrecipient for public services.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

During Program Year 2023, the City provided CDBG funding to PATH for emergency services and homeless services. This funding supported PATH's efforts to assess unhoused community members, provide case management, and provide rent and utility assistance. Homeless services funding from the City's CDBG program is a critical portion of the safety net for extremely low income community members.

PATH, Inc. was the Central Illinois Continuum of Care (CICoC) lead applicant during this program year. During the program year, the organization encountered several difficulties that led to service disruptions for unhoused community member. The City has provided technical assistance to PATH to aid the organization through challenges. While that support was ongoing, the City collaborated with other community organizations serving unhousing community member such as the Salvation Army and Home Sweet Home Ministries (HSHM).

HSHM is a subrecipient in Program Year 2024 for the City and will provide services to unhoused community members through the street outreach program.

**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 organizations within the CICoC utilize a coordinated entry approach that employs a standardized assessment process to identify the specific needs of each person to connect them to the services and housing opportunities needed to obtain and maintain housing. The Salvation Army provides emergency shelter for adults only while Home Sweet Home Ministries provides emergency shelter for adults and family units. Both organizations provide case management services to the residents of the emergency shelter and those who are unsheltered. Project Oz is the only organization in the area that provides housing and case management services to unaccompanied youth. Chestnut Health Systems receives CoC

funding to provide permanent supportive housing using a scattered site approach. The McLean County Center for Human Services currently offers scattered site permanent supportive housing but has been awarded a Low Income Housing Tax Credit project to develop a supportive housing facility called Sue's Landing. These housing programs offer clients support from many other service organizations beyond what they are able to provide.



## **CR-30 - Public Housing 91.220(h); 91.320(j)**

### **Actions taken to address the needs of public housing**

CDBG funds from the City also supported Section Three activities in partnership with the Housing Authority of the City of Bloomington. The Housing Authority of the City of Bloomington hosted a career training program and a job (and resource) fair for public housing residents.

The Housing Authority of the City of Bloomington's leadership is also an active participant in Housing Staff Committee and Affordable and Supportive Housing Committee made possible, in part, through City CDBG funding. Tackling larger region wide housing affordability issues will be a critical mission moving forward for these committees, and the Housing Authority of the City of Bloomington will play a vital role in developing long-term strategies.

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

The housing authority continues to administer a Family Self Sufficiency (FSS) program for public housing residents. This voluntary program allows members of a household to save money in an escrow account when the family increases its income. This savings is paid into the account monthly as a part of the family's rent payment. Resident Services staff help the participants set self-sufficiency goals to be completed over a matter of years. The participant is allowed to tap into their escrow account for education, purchasing of a car, and even a down payment on a home. Many housing authority families have benefitted from this program over the years.

Through Section Three job training programs, the City is actively funding a foundational approach to homeownership. Stable employment and finances are critical aspects of homeownership, and the City's Section Three funding provides incredible opportunities for Housing Authority of the City of Bloomington residents to build that foundation. Without employment and financial stability, homeownership will likely fail and place the community members at risk of homelessness. Thus, by building these skills the City along with the Housing Authority of the City of Bloomington is creating an environment to achieve long-term success in homeownership.

### **Actions taken to provide assistance to troubled PHAs**

The Housing Authority of the City of Bloomington is not categorized as troubled.

## **CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)**

**Actions taken 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. 91.220 (j); 91.320 (i)**

The City makes a concerted effort to keep all building permits/fees as low as possible. All approved contractors completing CDBG activities and not-for-profit agencies conducting housing activities are provided fee waivers. The City adopted a new zoning ordinance in early 2019 that takes affordable housing into consideration. The City also provides letters of consistency for local developers seeking tax credits for affordable housing development.

During Program Year 2023, the City began a comprehensive effort to identify solutions to the shortage of housing units (including units for low-income community members). While these efforts are ongoing, the City has facilitated several discussions with stakeholders, non-profit partners, developers, state officials, and Federal officials to determine the best way to tackle this program. Policy options are expected to be presented to elected officials in Program Year 2024.

### **Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

The City's CDBG housing rehabilitation program meets an important need within the community. Without this program, many households would have to take financially burdensome loans or not have access to credit at all to complete important rehabilitation to their homes to correct health, life, safety, and code compliance issues. As Bloomington, and all of McLean County, has experienced increased affordability issues, the maintenance of already affordable units is a critical component to any strategy to tackle the issue.

The City continues to expend close to 15% of its annual CDBG allocation on public service activities. In Program Year 2023, \$67,586.82 was spent on homelessness prevention, food insecurity for elderly residents, and neighborhood services in West Bloomington. Additionally, the City continues to serve as the Trustee for the John M. Scott Health Care Trust. This trust provided over \$700,000 in funding during the program year to address the healthcare needs of McLean County residents. The trust serves community members at or below 185% of the Federal Poverty Level. All grants awarded focus on goals identified in the McLean County Community Health Needs Assessment and Community Health Improvement Plan.

American Rescue Plan Act (ARPA) funds provided to the City were used for a variety of socio-economic needs including housing rehabilitation and non-profit grants. The ARPA housing rehabilitation program provides grants up to \$45,000 for health, life, safety, and code compliance issues in housing units with households at or below 80% of the Area Median Income (AMI). Non-profit grants provided funds for program and capital needs in the community. Those awards are summarized below.

- \$250,000 in capital improvement funding to expand Project Oz's Youth Center. This will create a flexible space for youth, families, counselors, training, job readiness, and technology stations to accommodate the growing needs of our community and the number of youth and families served. \$250,000 in capital improvements to expand YWCA's Stepping Stones facility to assist survivors of sexual violence. \$150,000 for Home Sweet Home Ministries' Rapid Rehousing Program to prevent homelessness. \$150,000 in capital improvements for the McLean County Center for Human Services to help community members with behavioral health care needs. \$150,000 for the Bloomington Salvation Army's Safe Harbor Homeless Shelter. \$71,731 for Mid-Central Community Action's Housing Navigator position to help community members experiencing homelessness or housing instability.

**Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

The City was awarded a 2.3 million dollar Lead-Based Paint Hazard Reduction Program and Healthy Homes grant in 2020. This grant will allow for the abatement of lead-based paint hazards in approximately 92 housing units. Delays in program implementation have come from continued challenges related to the COVID-19 Pandemic, contractor availability, and staff changes. These challenges continued in part of Program Year 2023, but the program became operational after a two and a half year delay in Program Year 2023. This grant was provided a year extension to serve community members into calendar year 2025.

The City's single-housing rehabilitation program also takes steps to reduce lead-based paint hazards by following applicable federal regulations on lead-based paint hazards. Single-family units built before 1978 are tested for lead-based paint hazards before the scope of work is drafted. Lead clearance testing also takes place in these properties after rehabilitation work is completed. Community members are provided the results of the lead assessment and clearance testing along with other information about lead-based paint hazards.

**Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

The City's CDBG funding helps reduce the number of poverty-level families in several ways. First, the City's housing rehabilitation program focuses on removing code violations that impact a resident's health, life, and safety. This work also protects the home of the family, which is not only their place of shelter but their primary investment. The homeowners that the CDBG program serves would not be able to afford a traditional home improvement loan without pushing the household into poverty. This program provides critical relief for these families for needs that have a prohibitive cost.

Second, the City's Section Three funding provided to the Housing Authority of the City of Bloomington also provides critical knowledge and education for public housing residents. Through this program, many community members are on a better path towards achieving employment and financial stability.

Finally, public service activity funding also helps residents avoid homelessness, provides food security,

and other critical neighborhood services that help people achieve a better socioeconomic position.

**Actions taken to develop institutional structure. 91.220(k); 91.320(j)**

The City continues to evaluate how to best manage grant programs currently held by the Economic and Community Development Department. Work has continued within the department to update, upgrade, and create policies and procedures to better operate all of the grant programs, including CDBG. These improvements will continue into Program Year 2024. The City will continue to seek partnerships with other community stakeholders to better grant programs and the services provided.

**Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

The City utilized past CDBG funding to support a regional housing study which was completed in 2017. As a result of the study, the McLean County Regional Planning Commission (MCRPC) has implemented a Regional Housing Advisory Committee comprised of a Staff Committee and the Affordable/Supportive Housing Group. The overall mission of the Regional Housing Advisory Committee is to provide a forum for housing stakeholders to interact on a regular basis, identify collaborative opportunities, and proactively address housing issues in the community. City staff currently participate on the Housing Staff Committee and the Affordable/Supportive Housing Group. Other members of the Staff Committee include representatives from MCRPC, the Housing Authority of the City of Bloomington, the Town of Normal, and PATH. The Affordable/Supportive Housing Group is comprised of social service agencies with a vested interest in quality, affordable housing opportunities for low-to-moderate income community members.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

In Program Year 2019, the City funded its first grant to directly address fair housing issues. The City created a partnership with Prairie State Legal Services to support a staff attorney position dedicating a portion of her time to address fair housing complaints and training local officials and City staff on fair housing laws and practices. This program was well received and continued to expand in Program Year 2020 to include a fair housing testing component. 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.

Additional barriers are addressed below.

1. Increased costs for residential development from fees, building materials, labor, and other inflationary pressures have substantially tightened the housing market to the detriment of low and

moderate income residents. The City is addressing this issue by maintaining an equitable, fair list of development fees. Additionally, the City offers permit waivers for not-for-profit organizations and all Grant Management Division approved contractors working on CDBG projects. The City continues to partner with several non-profit organizations dedicated to providing affordable housing through new construction and rehabilitation.

2. Public transportation issues identified by the community include limited bus routes and inconvenient hours of operation. The City continues, and hopes to build on, its partnership with Connect Transit, which the primary mass transit provider in the community. The partnership will hopefully investigate opportunities for CDBG funding to improve services for Connect Transit.

3. Deteriorating road and sidewalks have made housing choices more difficult for residents. CDBG funding was used in this program year for sidewalk upgrades and that plan is moving forward in future program years. Sidewalk improvements funded by CDBG amplify sidewalk improvement efforts across the City and help ensure that sidewalks are improved in areas with high percentages of low and moderate income community members. Many elderly and differently abled community members have benefited from these improvements and they will continue to see mobility improvements due to CDBG sidewalk funding. City staff and the community will investigate roads and sidewalks needs in the next consolidated plan and learn from sidewalk activities in this current consolidated plan.

4. Accessibility for disabled community members and the need for more permanent supportive housing has been an identified barrier as well. The City partners with AMBUCS to build accessibility ramps through the CDBG housing rehabilitation program. The City used CDBG funds to cover the cost of the material and AMBUCS provides the volunteer labor to construct the ramps.

5. Many residents were concerned about payday lenders and consumer installment loan licenses, but this issue was addressed by a City resolution in 2011 that prohibited particularly dangerous types of payday and consumer loans.

6. Housing costs continue to be impediments to fair housing choice. McLean County, like other communities, is facing a shortage of housing units. Significant economic growth has made this problem more prevalent in Bloomington-Normal. The City is working with other units of government, non-profits, developers, and other stakeholders to develop strategies and incentives to encourage housing development that provides options that are affordable for all community members.

## **CR-40 - Monitoring 91.220 and 91.230**

**Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

Monitoring activities include creating and implementing a tracking system to track progress on all projects, periodic reporting requirements, providing funding on reimbursement basis only, monitoring of subrecipients, and gathering annual financial audit information for subrecipients from an outside CPA firm for compliance with generally accepted practices and principals of accounting and compliance with federal statutes and regulations. City staff completed numerous monitorings of subrecipients during Program Year 2023.

The multitude of partnerships the City has with community stakeholders also allows the City to better plan and coordinate CDBG activities. This expanded as the planning process for the next Consolidated Plan began. One area the City has identified as a challenge is recruiting minority and women-owned businesses to Grants Management Division programs. Previous advertising efforts have not been highly successful, but revisions to the contractor recruitment and application process will hopefully improve recruitment of minority and women-owned businesses

## **Citizen Participation Plan 91.105(d); 91.115(d)**

**Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

The public comment period is from July 9, 2024, through July 25, 2024. A public hearing will be held during the regularly scheduled City Council meeting on July 22, 2024. Notice of the public hearing and public comment period was published in the Pantagraph on Wednesday, June 20, 2024. Notices related to the public comment period and public hearing were also shared on City social media, placed in the PATH-O-GRAM newsletter, and made available email correspondence to key organizations.

## **CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

The City's program objectives stayed consistent throughout the entire Consolidated Plan. These objectives were based on outreach completed during the creation of the 2020-2024 Consolidated Plan. The City will continue to work on mitigating challenges and turning opportunities into successes with the City's CDBG program.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**

**CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

The City’s program objectives stayed consistent throughout the entire Consolidated Plan. These objectives were based on outreach completed during the creation of the 2020-2024 Consolidated Plan. The City will continue to work on mitigating challenges and turning opportunities into successes with the City’s CDBG program.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**



### CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

<b>Total Labor Hours</b>	<b>CDBG</b>	<b>HOME</b>	<b>ESG</b>	<b>HOPWA</b>	<b>HTF</b>
Total Number of Activities	0	0	0	0	0
Total Labor Hours					
Total Section 3 Worker Hours					
Total Targeted Section 3 Worker Hours					

**Table 8 – Total Labor Hours**

<b>Qualitative Efforts - Number of Activities by Program</b>	<b>CDBG</b>	<b>HOME</b>	<b>ESG</b>	<b>HOPWA</b>	<b>HTF</b>
Outreach efforts to generate job applicants who are Public Housing Targeted Workers					
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.					
Direct, on-the job training (including apprenticeships).					
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.					
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).					
Outreach efforts to identify and secure bids from Section 3 business concerns.					
Technical assistance to help Section 3 business concerns understand and bid on contracts.					
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.					
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.					
Held one or more job fairs.					
Provided or connected residents with supportive services that can provide direct services or referrals.					
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.					
Assisted residents with finding child care.					
Assisted residents to apply for, or attend community college or a four year educational institution.					
Assisted residents to apply for, or attend vocational/technical training.					
Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.					
Provided or connected residents with training on computer use or online technologies.					
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					

Other.					
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**Table 9 – Qualitative Efforts - Number of Activities by Program**

**Narrative**