



City of Bloomington Consolidated Plan 2020-2024

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Executive Summary



Executive Summary

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

1. Introduction

In order to receive Community Development Block Grant (CDBG) funds, government grantees must develop a 5-year Consolidated Plan that provides a vision for housing and community development in the jurisdiction. The plan describes community needs, resources and priorities, sets goals, and establishes strategies to meet those goals.

In prior years, the City of Bloomington and Town of Normal have independently developed and submitted separate Consolidated Plans. In response to the 2017 Regional Housing Study and the Department of Housing and Urban Development's (HUD) emphasis on inter-jurisdictional coordination, Bloomington and Normal worked with the McLean County Regional Planning Commission (MCRPC) to jointly develop their Consolidated Plans (2020-2024) for the first time.

The joint consolidated planning outreach process for the City of Bloomington and Town of Normal began in Fall 2018 with the development of a joint Citizen Participation Plan and continued through July 2019. While the jurisdictions will still receive separate funding allocations and submit individualized plans, conducting outreach and planning processes jointly was a more effective use of resources and allowed for identifying regional housing and community development priorities.

The data collection procedures used to develop this plan came together under collaboration with the City of Bloomington, Town of Normal and McLean County Regional Planning Commission (MCRPC). Qualitative and quantitative data was collected via surveys, interviews, focus groups and public meetings.

Two separate surveys were utilized during the outreach process: one for stakeholders and another for citizens. This allowed for comparisons between what service providers identified as priority issues for the clients they serve, and priority needs identified by residents. All told, 1,210 citizens and 29 stakeholders responded to their respective surveys. Of the citizen survey respondents, 774 were from Bloomington and 430 were from Normal.

After the survey period was finalized, MCRPC, City and Town staff held public meetings that were open to all residents wanting to further weigh in on how they would like to see CDBG funds spent. Stakeholders were also given the chance to communicate directly with MCRPC, City and Town staff through a series of focus groups.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

Throughout this Plan, the City of Bloomington will fund programs and services aimed at improving the lives of its low- and moderate-income residents. CDBG funds will be utilized to support housing rehabilitation, demolition of blighted structures, construction of new, affordable housing, public facility and infrastructure improvements, public services, and grant administration. Through the consultation process, the City developed a list of priority areas that will receive funding preference. A copy of funding priorities for public services, housing, public facilities and other community development programs can be found in the Appendix and in section SP-25 Priority Needs.

3. Evaluation of past performance

The City leverages CDBG, City General Fund and other funding sources to meet the needs of the community. Historically, the City has balanced funding between single-family, owner-occupied housing rehabilitation, demolition of abandoned/condemned properties, infrastructure projects, public service projects and administration. A sampling of the City's successful endeavors is outlined below:

Affordable Housing Preservation

The City recognizes that preserving the current affordable housing stock is as important as new development. The Housing Rehabilitation Program has been the cornerstone of the City's preservation efforts for more than 30 years. Under current guidelines, the program provides income-eligible, single-family homeowners the opportunity to complete critical home improvements through a 0% interest, deferred loan. The City dedicates roughly 35% of the annual CDBG allocation to this program, providing funding for 15-20 rehabilitation projects capped at \$25,000.

The City has developed several partnerships with not-for-profits that have furthered preservation efforts. When the City acquires a property that does not meet the criteria for demolition, it donates the property to an organization such as Mid Central Community Action or YouthBuild along with a \$25,000 grant to support rehabilitation costs. The home is then sold or rented to an income-eligible household at a price that meets affordability guidelines.

The City has partnered with the West Bloomington Revitalization Project (WBRP) for more than a decade. WBRP offers a variety of programs and services available to area residents. In the past, the City has supported The Tool Library and Façade Program. The Tool Library offers free tool rentals to residents interested in performing their own maintenance, eliminating the additional cost of renting or purchasing expensive tools. The Façade Program provided assistance with minor exterior rehabilitation through a grant process. In Program Year 2019, WBRP decided to focus its attention on strengthening its neighborhood revitalization efforts outside of housing rehabilitation. The City utilized CDBG funds to support Habitat for Humanity McLean County's A Brush with Kindness program, which also provides assistance with exterior repairs.

The Illinois Housing Development Authority (IHDA) offers several grants to support housing rehabilitation for income-eligible homeowners. During the 2015-2019 Consolidated Plan period, the City received funding in two rounds of the Single Family Rehabilitation (SFR) program, adding an additional \$614,250 to its housing rehabilitation efforts. SFR provides up to \$45,000 in assistance per property through a five-year forgivable mortgage. In the first round of funding, the City received \$236,250 and completed six projects. Staff anticipate completing 8-10 projects with Round 2 funding.

In Program Year 2019, the City received \$100,000 from IHDA's Home Accessibility Program (HAP) for accessibility improvements. HAP is different from SFR in that single-family rental properties are also eligible for assistance. Similar to SFR, HAP offers financial assistance through a 5-year forgivable mortgage. Funding per property is limited to \$25,000. This is the first time the City has received funding dedicated solely to accessibility improvements.

New Affordable Housing

The City supports the development of new, affordable housing in several ways. The Community Development Department supports Habitat for Humanity McLean County's program that creates affordable homeownership opportunities for low-income residents. When either Habitat or the City obtains ownership of a property meeting specific criteria for blight, demolition and clearance is performed and new water/sewer services are provided, if necessary. Habitat then builds a new, affordable housing unit on the property. This partnership results in 5-7 new units annually.

The City supports developers through the LIHTC application process by providing letters of support and the Certificates of Consistency, as appropriate. In some cases, the City provides additional incentives through zoning, tax assistance or historic preservation. During the 2015-2019 Consolidated Plan period, two new affordable housing projects in Bloomington received LIHTC awards. The first project focused on providing 54 new senior housing units. The project includes the adaptive reuse of the former Bloomington High School built in 1914. To facilitate the project, the City established a Tax Increment Financing (TIF) district and agreed to provide rental assistance for 4 units. The City also assisted with designation of the building to the National Register of Historic Places, opening the project up to potential historic tax credits. The second project was recently approved, and the City is working with the developer through the subdivision process. The project includes new construction of 56 multi-family units.

Demolition

The City dedicates funding for demolition and clearance activities. As previously stated, some of the funds are used to create new affordable housing units. When a blighted property is deemed as not "buildable" due to its size, location, etc., CDBG funds are allocated to demolish the structures and clear the property of debris. When possible, the lot is donated to a not-for-profit for green space.

The City has received more than \$260,000 in funding through IHDA's Abandoned Property Program (APP) over the past eight years. APP provides relief to the City's General Fund for the maintenance of vacant/abandoned properties. Eligible activities include mowing/trimming, pest extermination and prevention, garbage/debris removal, securing services, fencing, rehabilitation and demolition. The City allocates the majority of APP funding to mowing/trimming and demolition.

Public Facilities and Improvements

The City dedicates approximately 20% of its CDBG allocation each year to public facility and infrastructure projects in low- and moderate-income areas. During the 2015-2019 Consolidated Plan period, nearly \$800,000 in CDBG funding was used to support two park projects, three sewer projects, one street project, two sidewalk projects, and four facility improvements for not-for-profit organizations.

Public Services

CDBG regulations limit funding of public service activities to 15% of the annual allocation. Historically, the City has expended 13-14% of its annual allocation on public services. During the 2015-2019 Consolidated Plan, agencies were supported to provide homeless services, senior services, and neighborhood services for West Bloomington residents.

4. Summary of citizen participation process and consultation process

Citizen participation and stakeholder consultation is an essential part of the Consolidated Plan process. The Citizen Participation Plan outlines the guidelines and procedures that allow citizens and stakeholders to influence the decisions that affect housing and community development in their community.

In preparation for the 2020-2024 Consolidated Plan, the City of Bloomington and Town of Normal partnered with the McLean County Regional Planning Commission to draft an updated Citizen Participation Plan to serve as the guiding document for engaging the public in the Consolidated Planning and related processes.

The first step in the Consolidated Plan outreach process was to create a page on the MCRPC website dedicated to everything CDBG. The CDBG page hosts a variety of information, including the current status of the process, explanation of the CDBG program and eligible activities, past expenditures and a map showing eligible low- to moderate-income block groups in Bloomington and Normal. The page continued to be used throughout the process to keep the public informed.

The Citizen Survey was made available in both paper and digital formats in English, Spanish and French. The paper survey was made available through a wide variety of channels. Community events provided opportunities to reach residents outside their homes as MCRPC, City of Bloomington and Town of Normal staff attended over 30 events totaling more than 60 hours of outreach. Staff distributed both paper surveys and the link to the online survey at all events. In addition to yielding more completed surveys, direct outreach with the public resulted in valuable conversations that may not have otherwise occurred through an anonymous survey or at a large public meeting. While the survey was open to any resident of Bloomington or Normal, special efforts were taken to reach out to low- to moderate-income populations, as they are the intended beneficiaries of CDBG funds. Several organizations and businesses throughout the community contributed by making surveys freely available to patrons.

In addition to attending meetings and community events, City, Town and MCRPC staff partnered with community organizations and local media to help spread the word about the Consolidated Plan and Citizen Survey. Over the course of the public outreach phase, staff gave radio interviews on a local radio station (WGLT) to provide information on how the public could get involved in the outreach process. Coverage from a local TV station (WEEK) and newspaper (Pantagraph) also helped increase the visibility of the efforts. The City, Town and MCRPC also used their social media channels (Facebook, NextDoor, Constant Contact) and websites to promote the survey and outreach process. Feedback received in response to these posts/messages were noted and considered when developing the Consolidated Plan.

The Citizen Survey would not have been as successful without the help of partner organizations. Three local institutions of higher education (Illinois State University, Illinois Wesleyan University and Heartland Community College) promoted the survey to their student bodies; both local school districts (Unit 5 and District 87) sent emails to all parents and guardians, and PATH featured the survey announcement multiple times in the PATH-O-GRAM. Other organizations promoted the survey via email and social media. The Bloomington Housing Authority also put a copy of the survey in each June 2019 rent statement. Finally, 17 drop boxes were placed at various public locations throughout Bloomington and Normal.

To further engage the college student population, two focus groups were held at Illinois State University. Special efforts were taken to reach this population prior to the summer when most of them would not be in the Bloomington-Normal area.

5. Summary of public comments

Section will be updated after the public comment period ends.

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

Section will be updated after the public comment period ends.

7. Summary

Section will be updated after the public comment period ends.



The Process



The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities 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	Community Development Department

Table 1 – Responsible Agencies

Narrative

The City of Bloomington's Community Development Department – Office of Grants Administration is the lead entity responsible for implementing the 2020-2024 Consolidated Plan. Community Development staff has been responsible for managing the City's housing and community development efforts for 45 years. The Office of Grants Administration's Grants Coordinator is responsible for preparing and submitting the Consolidated Plan, Annual Action Plans, Consolidated Annual Performance Evaluation Reports (CAPER), Environmental Review Records and other required reports. Additionally, the Grants Coordinator is responsible for overall financial monitoring/compliance of all CDBG and other grant funds, sub-recipient monitoring and community outreach and involvement.

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. All three agencies are members of the Regional Housing Staff Advisory Committee which also includes representatives from the Behavioral Health Coordinating Council, Providing Access to Help (PATH) and Bloomington Housing Authority. MCRPC served as the lead agency for the consolidated plan process, providing a wealth of knowledge during the community engagement and data analysis processes.

Consolidated Plan Public Contact Information

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PR-10 Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

Introduction

The Regional Housing Staff Advisory Committee served as the advisory body for the Consolidated Plan process. 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. From the design of the surveys to the facilitation of the public meetings, this Committee participated in all aspects of the planning process.

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)).

In September 2019, the City was one of six cities nationwide to receive a National League of Cities' Healthy Housing technical assistance grant. Through this opportunity, the City will look closely at opportunities and challenges as they pertain to health and housing in our community. At the end of the 18-month grant period, the City will have an action plan that will include public and assisted housing providers, anchor institutions and service providers. The City also serves on the Regional Housing Staff Advisory Committee and Affordable/Supportive Housing Committee which bring together housing and service providers throughout the region to discuss housing concerns and solutions for special populations.

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

The City of Bloomington works with PATH (Providing Access to Help) Crisis Center, lead coordinating agency for the Central Illinois Continuum of Care (CICoC). PATH holds monthly McLean County CoC hub meetings that encourage stakeholders in the community to discuss ways to assist those experiencing homelessness or at risk of experiencing homelessness. A variety of sub-committees on veteran homelessness, youth homelessness, HMIS data quality and System Performance Measures, operate to improve the CoC system.

PATH also assists the City with efforts on the consolidated plan. As the HMIS Lead, PATH is able to provide data regarding the nature and scope of homelessness in the geographic region. 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 Crisis Center and Recycling Furniture for Families (RF4F) to support services for individuals experiencing homelessness or at-risk of becoming homeless. The outreach team regularly goes into the field to known places unfit for human habitation to locate people, initiate relationships, assess needs and help clients navigate the network of resources available in the community.

The first place most people go after leaving street living are the local emergency shelters. 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 part of Children's Home & Aid, provides emergency shelter to children from birth through six years of age. Project Oz specializes in assisting youth who are experiencing homelessness and is able to provide immediate shelter to youth ages 10-22.

For families with children, outreach and case managers will refer them to the McKinney Vento Homeless Liaisons in the local school district. This ensures children are able to get to school, have adequate supplies, and have additional support while they navigate experiencing homelessness.

Veterans who are experiencing homelessness are referred to an array of agencies that collaborate together: Salvation Army SSVF, the Veteran Assistance Commission, Veterans Health Administration, PATH's We Are Building Lives, and the

Illinois Department of Employment Security's Disabled Veterans Outreach. From their efforts, as of March 2019, the Central Illinois CoC has been recognized by the United States Interagency Council on Homelessness, HUD, and other federal partners for effectively ending Veteran homelessness. This means that our infrastructure in place is able to house a Veteran within 90 days once they have been identified. Through Coordinated Entry, PATH is able to coordinate referrals to agencies that provide housing from the CoC's prioritization list. Those who are assessed as most vulnerable are selected first for housing referrals that open up in the CoC.

The Coordinated Entry process also uses PATH's 211 Call Center. It is a 24/7 information and referral system designed to assess the needs of callers and refer them to available resources in the community. In this way, the CoC is able to provide information to those who are at risk of homelessness across 44 counties, 9 of which are in the CCoC. Callers in McLean County, who are at risk of homelessness, are also referred to the Homeless Services Program at PATH for additional assistance.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the 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 will 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 jurisdictions consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

Agency/Group/Organization	Agency/Group/Organization Type	What section of the plan was addressed by consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
McLean County Emergency Management Agency	Other government-County	Other- Infrastructure Needs; Lead-based Paint Strategy	Attended focus group; feedback from public outreach incorporated into determination of 5-year priorities
City of Bloomington Community Development, Parks, Water and Engineering Departments	Other government-Local	Other- Infrastructure Needs; Lead-based Paint Strategy	Participated in writing the Plan; Attended focus groups; feedback from public outreach incorporated into determination of 5-year priorities
Town of Normal Planning, Parks, Water and Engineering Departments	Other government-Local	Other- Infrastructure Needs; Lead-based Paint Strategy	Participated in writing the Plan; Attended focus groups; feedback from public outreach incorporated into determination of 5-year priorities
Connect Transit	Other-Transit Organization	Economic Development	Attended focus group; feedback from public outreach incorporated into determination of 5-year priorities
Salvation Army of Bloomington and McLean County	Housing; Services-Homeless	Housing Needs Assessment; Homeless needs- Chronically homeless; Homeless needs- Families with children; Homeless needs- Veterans; Homelessness Strategy	Attended focus group and responded to stakeholder survey; feedback from public outreach incorporated into determination of 5-year priorities
Recycling Furniture for Families	Services-homeless; Services- victims of domestic violence	Homeless needs- Chronically homeless; Homeless needs- Families with children; Homeless needs- Veterans;	Attended focus group and responded to stakeholder survey; feedback from public outreach incorporated into determination of 5-year priorities

PATH Crisis	Services-homeless; Services- victims of domestic violence; Services-Health; Housing; Services-Elderly Persons	Housing Needs Assessment; Homeless needs- Chronically homeless; Homeless needs- Families with children; Homeless needs- Veterans; Homelessness Strategy	Attended focus group and responded to stakeholder survey; feedback from public outreach incorporated into determination of 5-year priorities
Project Oz	Housing; Services-Homelessness; Services-Children;	Housing Needs Assessment; Homeless needs- Chronically homeless: Homeless needs- Unaccompanied youth	Attended focus group and responded to stakeholder survey; feedback from public outreach incorporated into determination of 5-year priorities
Bloomington Housing Authority	Housing; PHA	Housing Needs Assessment; Public Housing Needs	Attended focus group and responded to stakeholder survey; feedback from public outreach incorporated into determination of 5-year priorities
Integrity Counseling	Services-Homeless; Services-Health	Housing Needs Assessment; Anti-poverty Strategy; Non-Homeless Special Needs	Attended focus groups and responded to stakeholder survey; feedback from public outreach incorporated into determination of 5-year priorities
Home Sweet Home Ministries	Housing; Services-Homeless; Other-food services (pantry)	Housing Needs Assessment; Homeless needs- Chronically homeless; Homeless needs- Families with children; Homeless needs- Veterans; Homelessness Strategy	Attended focus group and responded to stakeholder survey; feedback from public outreach incorporated into determination of 5-year priorities
Mid Central Community Action Agency	Housing; Services-Education; Services-Victims of Domestic Violence; Neighborhood Organization	Housing Needs Assessment; Homelessness Strategy; Anti-poverty Strategy; Non-Homeless Special Needs	Attended focus group and responded to stakeholder survey; feedback from public outreach incorporated into determination of 5-year priorities
Prairie State Legal Services	Service-Fair Housing	Housing Needs Assessment; Market Analysis; Other-Analysis of Impediments	Attended focus group and responded to stakeholder survey; feedback from public outreach incorporated into determination of 5-year priorities

The Baby Fold	Housing; Services-Children; Services-Education	Housing Needs Assessment; Non-Homeless Special Needs; Anti-poverty Strategy	Attended focus group; feedback from public outreach incorporated into determination of 5-year priorities
Normal Township	Other government-Local	Housing Needs Assessment; Anti-poverty Strategy	Attended focus group; feedback from public outreach incorporated into determination of 5-year priorities
YWCA	Housing; Services-Victims of Domestic Violence; Services-Education	Housing Needs Assessment; Anti-poverty strategy	Attended focus group; feedback from public outreach incorporated into determination of 5-year priorities
United Way of McLean County	Foundation	Economic Development; Anti-poverty Strategy	Attended focus group; feedback from public outreach incorporated into determination of 5-year priorities
Life-CIL Center for Independent Living	Services-Persons with Disabilities	Non-homeless Special Needs	Attended focus group and responded to stakeholder survey; feedback from public outreach incorporated into determination of 5-year priorities
Regional Office of Education	Services-Children; Services-Education	Economic Development; Non-Homeless Special Needs	Attended focus group and responded to stakeholder survey; feedback from public outreach incorporated into determination of 5-year priorities
YouthBuild McLean County	Services-Children; Services-Education	Anti-Poverty Strategy	Attended focus group; feedback from public outreach incorporated into determination of 5-year priorities
Heartland Head Start	Services-Children; Services-Education	Anti-Poverty Strategy	Attended focus group; feedback from public outreach incorporated into determination of 5-year priorities
East Central Illinois Area Agency on Aging	Services-Elderly Persons	Housing Needs Assessment	Attended focus group; feedback from public outreach incorporated into determination of 5-year priorities
Bloomington Normal Economic Development Council	Regional organization; Business Leaders	Economic Development	Provided feedback via email; feedback from public outreach incorporated into determination of 5-year priorities
McLean County Chamber of Commerce	Regional organization; Business Leaders	Economic Development	Attended focus group; feedback from public outreach incorporated into determination of 5-year priorities

Center for Hope	Other-food services (pantry)	Housing Needs Assessment; Homelessness Strategy; Anti-poverty Strategy; Non-Homeless Special Needs	Attended focus group; feedback from public outreach incorporated into determination of 5-year priorities
Autism McLean	Services-Persons with Disabilities	Housing Needs Assessment; Non-Homeless Special Needs	Attended focus group and responded to stakeholder survey; feedback from public outreach incorporated into determination of 5-year priorities
Advocate BroMenn Medical Center	Services-Health	Non-Homeless Special Needs	Attended focus group; feedback from public outreach incorporated into determination of 5-year priorities
Chestnut Health Systems	Housing; Services-Health; Publicly Funded Institution/ System of Care	Housing Needs Assessment; Non-Homeless Special Needs	Attended focus group and responded to stakeholder survey; feedback from public outreach incorporated into determination of 5-year priorities
Center for Human Services	Services-Health; Services-Children	Non-Homeless Special Needs	Attended focus group and responded to stakeholder survey; feedback from public outreach incorporated into determination of 5-year priorities
McLean County Health Department	Services-Health; Health Agency; Other government-County	Non-Homeless Special Needs; Lead-based Paint Strategy	Attended focus group; feedback from public outreach incorporated into determination of 5-year priorities
John M. Scott Health Commission	Foundation	Non-Homeless Special Needs	Attended focus group; feedback from public outreach incorporated into determination of 5-year priorities
Behavioral Health Coordinating Council	Services-Health; Health Agency	Non-Homeless Special Needs	Attended focus group and responded to stakeholder survey; feedback from public outreach incorporated into determination of 5-year priorities

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

No agency types were purposefully not consulted with.

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?
BN Home Regional Housing Study	McLean County Regional Planning Commission	BN Home touches on all aspects of housing in McLean County with special emphasis on affordable and special needs housing, as well as non-housing community development.
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.
Town of Normal Comprehensive Plan	Town of Normal	The Comprehensive Plan focuses on housing, economic development, land use, transportation, health, community facilities, services and other related topics.
McLean County Community Health Needs Assessment	McLean County Health Department	The Community Health Needs Assessment discusses sets the public health priorities for the County, with special focus on special needs populations.
Continuum of Care	PATH	The Continuum of Care works to support homeless individuals to self-sufficiency. These goals closely align with this Plan's housing goals.
Bloomington-Normal Metropolitan Planning Area Transportation Improvement Plan (TIP)	McLean County Regional Planning Commission	Planned infrastructure projects identified in the TIP are informative to planning for determining funding priorities through CDBG.
BN Advantage Economic Development Strategy	Various	The goal of the Strategy is to advance the Bloomington-Normal Metro Region's community and economic growth and vitality by sustaining the region's superior quality of life and diversifying its economy. Strategies presented align closely with non-housing community development.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

The citizen participation process conducted as part of the 2020-2024 Consolidated Plan development was the most intensive, targeted outreach process conducted in the history of the CDBG programs in Bloomington and Normal. The Citizen Survey served as the foundation of the process and special efforts were made to ensure that everyone, especially people with low- to moderate-incomes, had an opportunity to give feedback. While surveys were available electronically and in paper form throughout the community for a four month period, (April - July 2019), taking the surveys to events and places throughout the community yielded the most meaningful results. For example, survey outreach at Home Sweet Home Ministries' lunch hour allowed staff to build relationships with people experiencing homelessness and other low- to moderate-income individuals. It is unlikely that many of the individuals that completed surveys during this time would have done so otherwise. Attending Peace Meal lunches at Woodhill Towers and Phoenix Towers in Bloomington, and the Activity and Recreation Center in Normal allowed staff to connect with low and moderate income senior residents in person and obtain their feedback. Efforts were taken to ensure that all residents of Bloomington and Normal, regardless of their income level, living situation or language spoken at home, were given an opportunity to participate in the Consolidated Plan process.

Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons
Public Meeting	Families of and persons with disabilities	Surveys Distributed	See Survey Analysis Documents	N/A
Public Meeting	Service providers of those experiencing or at risk of homelessness	Surveys Distributed	See Survey Analysis Documents	N/A
Public Event	Families; health and wellness	Surveys Distributed	See Survey Analysis Documents	N/A
Public Event	low-to-moderate income families; housing authority residents	Surveys Distributed	See Survey Analysis Documents	N/A
Public Event	Bloomington residents who want to learn about the City's programs and services	Surveys Distributed	See Survey Analysis Documents	N/A
Public Meeting	HRC members and those they present	Surveys Distributed	See Survey Analysis Documents	N/A

Survey	Extremely low-to-moderate income families; ESL residents	Surveys Distributed	See Survey Analysis Documents	N/A
Survey	Extremely low-to-moderate income families; ESL residents	Surveys Distributed	See Survey Analysis Documents	N/A
Public Event	Residents of low-to-moderate income neighborhoods	Surveys Distributed	See Survey Analysis Documents	N/A
Focus Group	Residents of low-to-moderate income neighborhoods	Surveys Distributed	See Survey Analysis Documents	N/A
Focus Group	ISU Students that live off campus	Surveys Distributed	See Survey Analysis Documents	N/A
Public Event	Low-income persons; renters	Surveys Distributed	See Survey Analysis Documents	N/A
Public Event	Residents of low- to-moderate income neighborhoods	Surveys Distributed	See Survey Analysis Documents	N/A
Public Event	Families; health and wellness	Surveys Distributed	See Survey Analysis Documents	N/A
Public Event	Families, general population	Surveys Distributed	See Survey Analysis Documents	N/A
Public Event	Residents of low-to-moderate income neighborhoods	Surveys Distributed	See Survey Analysis Documents	N/A

Survey	Low-to-moderate income senior housing authority residents	Surveys Distributed	See Survey Analysis Documents	N/A
Survey	Low-to-moderate income seniors	Surveys Distributed	See Survey Analysis Documents	N/A
Survey	Low-to-moderate income families	Surveys Distributed	See Survey Analysis Documents	N/A
Public Event	Families	Surveys Distributed	See Survey Analysis Documents	N/A
Public Event	Families	Surveys Distributed	See Survey Analysis Documents	N/A
Survey	Low-income and disabled residents	Surveys Distributed	See Survey Analysis Documents	N/A
Survey	Low-income and homeless persons	Surveys Distributed	See Survey Analysis Documents	N/A
Survey	Families with disabilities	Surveys Distributed	See Survey Analysis Documents	N/A
Survey	West Bloomington residents/families	Surveys Distributed	See Survey Analysis Documents	N/A
Survey	Low-income and homeless persons	Surveys Distributed	See Survey Analysis Documents	N/A

Public Event	Families; low- to moderate-income families	Surveys Distributed	See Survey Analysis Documents	N/A
Public Event	Families; minorities; general population	Surveys Distributed	See Survey Analysis Documents	N/A
Focus Group	ESL Residents; Residents of low- to-moderate income neighborhoods	Surveys Distributed	See Survey Analysis Documents	N/A
Public Event	General Population	Surveys Distributed	See Survey Analysis Documents	N/A
Public Event	General Population, University Students	Surveys Distributed	See Survey Analysis Documents	N/A
Email, Facebook	Unit 5 - Families; low-to-moderate income families			N/A
Email	District 87 - families; low-to-moderate income families			N/A
Facebook	WBRP - low-to-moderate income persons			N/A
Email	Boys and Girls Club - Families; low-to-moderate income families			N/A
Facebook	MCCA - low-to-moderate income persons			N/A

Presentation	Bloomington Planning Commission Commissioners			N/A
Email	Penguin Project - Families of persons with disabilities			N/A
Email	SOAR - Families of persons with disabilities			N/A
Email, Social Media	ISU Center for Community Engagement and Service Learning - Students			N/A
Email, Social Media	Heartland Community College - Students			N/A
Email	IWU Action Research Center - Students			N/A
NextDoor app	City of Bloomington - General Population			N/A
Website	City of Bloomington - General Population			N/A
NextDoor app	Town of Normal - General Population			N/A
Email	Path-O-Gram - Agencies serving low-to-moderate income persons			N/A

website	MCRPC - General Population			N/A
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Table 4 – Citizen Participation Outreach



Needs Assessment



Needs Assessment

NA-05 Overview

Needs Assessment Overview

While data from the American Community Survey (ACS) and other national data sets are informative, local planning initiatives and results of outreach efforts form the core of the Needs Assessment. A regional housing study, BN Home (October 2017), identified housing needs for the diverse populations of Bloomington and Normal, while providing guidance on housing policy to municipal officials, social service providers, housing authorities, home owners, realtors, developers, management companies, and other stakeholders. The following were the key findings of that report: 1. A loss of population has reduced demand for both single-family and multi-family housing; 2. There is a mismatch between new supply and household size, with an excess supply of housing units with three or more bedrooms; 3. McLean County is relatively affordable compared to peer communities. However, there are two gaps in the supply of affordable housing. The first is an inadequate supply of housing units for low-income households that need a rent subsidy. The second is an inadequate supply of housing units for elderly households with incomes between \$25,000 and \$35,000; 4. Few opportunities exist for the homeless population; 5. There appears to be a variety of options for older persons with disabilities but facilities are limited for persons aged 18 to 64 who have mobility limitations or disabilities.

As a result of this study, the Regional Housing Advisory Committee completed research and published a variety of white papers on issues related to affordable housing in McLean County. One such white paper examined the different types of “income-qualified” housing in McLean County, quantifying the availability of those units and comparing that to the need for such units based on household income brackets. Income-qualified housing refers to rental housing units designated for households making less than 80% of the area median income; tenants in these programs must be “income-qualified.” In McLean County, income-qualified housing includes Low Income Housing Tax Credit (LIHTC) units, Project Based Section 8 Rental Assistance (PBRA) units, USDA Section 515 Rural Multifamily Housing units, Public Housing units and Section 8 Housing Choice Voucher units. This research found that only 14% of occupied rental units in McLean County are income-qualified, while nearly 72% of households that rent in McLean County qualify for housing units or vouchers restricted to 80% AMI and approximately 53% of them qualify for units restricted to 50% AMI. Additionally, the white paper examined the affordability requirements and subsidy expirations tied to income-qualified units and found that in the next 10 years, 625 of 1,721 total LIHTC units will reach their 30-year expiration and face a potential loss of affordability or income restriction. In the next 10 years, 266 out of 640 total PBRA units will reach the end of their current contracts and face a potential loss of affordability in the form of income-restricted units. Some of these units are also assisted by LIHTC and would maintain LIHTC affordability after the PBRA contract ends. In the next 10 years, 27 of 117 USDA Section 515 units will reach their loan maturation date and face a loss of affordability or income restrictions. Some of these units are also assisted by LIHTC and would maintain LIHTC affordability after the Section 515 contract ends.

The key points of this research are that income-qualified housing needs in McLean County far exceed housing unit availability, and a significant number of existing income-qualified units are at risk of losing their affordability or income restrictions in the next 10 years.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

As referenced in the previous section, the income-qualified housing needs in the region far exceed availability. Many of the comments received through the Citizen Survey referenced that, while there may be a number of rental units that are affordable to households with low incomes, the quality of those units may be sub-standard. Conversations with those working in the social service and housing industries back up those comments.

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	76,610	78,205	2%
Households	29,344	31,110	6%
Median Income	\$55,530.00	\$62,254.00	12%

Table 1 - Housing Needs Assessment Demographics

Data Source:	2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)
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Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	4,785	3,860	5,040	3,260	14,170
Small Family Households	1,125	1,130	2,015	1,430	7,790
Large Family Households	310	230	230	235	975
Household contains at least one person 62-74 years of age	670	630	780	500	2,290
Household contains at least one person age 75 or older	660	770	565	125	830
Households with one or more children 6 years old or younger	705	835	870	635	1,765

Table 2 - Total Households Table

Data Source:	2011-2015 CHAS
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Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	75	4	0	10	89	4	0	0	0	4
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	80	50	25	55	210	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	155	70	15	60	300	0	35	35	0	70
Housing cost burden greater than 50% of income (and none of the above problems)	1,975	240	30	0	2,245	595	160	130	45	930
Housing cost burden greater than 30% of income (and none of the above problems)	760	925	245	10	1,940	285	490	655	255	1,685
Zero/negative Income (and none of the above problems)	170	0	0	0	170	170	0	0	0	170

Table 3 – Housing Problems Table

Data Source: 2011-2015 CHAS

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete

plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total		>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	2,290	360	70	130	2,850	600	195	160	45	1,000
Having none of four housing problems	1,095	1,685	2,105	1,185	6,070	460	1,620	2,700	1,900	6,680
Household has negative income, but none of the other housing problems	170	0	0	0	170	170	0	0	0	170

Table 4 – Housing Problems 2

Data Source: 2011-2015 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	790	420	74	1,284	170	215	295	680
Large Related	200	40	15	255	60	20	30	110
Elderly	525	250	50	825	425	225	265	915
Other	1,470	490	130	2,090	230	200	205	635
Total need by income	2,985	1,200	269	4,454	885	660	795	2,340

Table 5 – Cost Burden > 30%

Data Source: 2011-2015 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	620	105	4	729	150	60	45	255
Large Related	170	0	0	170	10	0	10	20

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Elderly	320	65	25	410	275	50	50	375
Other	1,060	65	0	1,125	165	55	20	240
Total need by income	2,170	235	29	2,434	600	165	125	890

Table 6 – Cost Burden > 50%

Data Source: 2011-2015 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	225	85	15	115	440	0	35	0	0	35
Multiple, unrelated family households	0	35	0	0	35	0	0	35	0	35
Other, non-family households	10	0	25	0	35	0	0	0	0	0
Total need by income	235	120	40	115	510	0	35	35	0	70

Table 7 – Crowding Information – 1/2

Data Source: 2011-2015 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 8 – Crowding Information – 2/2

Data Source Comments:

Describe the number and type of single person households in need of housing assistance.

According to the 2010 census data there are 10,314 single-person households in the City of Bloomington, making up

32.6% of the population. Within this category 18.1% of single-person households are female, and 14.5% (4,591) are male. According to the Bloomington Housing Authority there are currently 41 single-person households on the public housing waiting list. Out of the current 568 households on the Bloomington area waiting list for Section 8 Housing Choice Vouchers, single-person households make up the highest percentage of all households at 35.4% (201).

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

According to the 2019 Point-in-Time, there were 50 adults with a serious mental illness, 32 adults with a substance use disorder, and 0 adults with HIV/AIDS. Depending on the person, comorbidity is a possibility.

Looking at an Annual Performance Report for the Outreach grant through PATH in McLean County for its last operating year (06/01/2018 to 05/31/2019), we can get another snapshot of individuals and families who have a disabling condition at the start of their involvement of services. Out of 287 people served, 95 had a mental health problem, 21 had alcohol abuse, 16 had drug abuse, 29 had both alcohol and drug abuse, 69 had a chronic health condition, 0 had HIV/AIDS, 26 had a developmental disability, and 41 had a physical disability.

Depending on the type of disability (e.g., having HIV/AIDS), it may be underreported for fear of embarrassment and stigmatization. Given that we report 0 adults with HIV/AIDS, it is possible that people are reluctant to share that kind of sensitive information.

According to the 2019 Point-in-Time count, there were 19 adults who were actively fleeing or attempting to flee domestic violence. They were part of the sheltered count and staying at Neville House, the local domestic violence shelter. Of that, 13 were female and 6 were males. The vast majority were African American (14).

Looking at an Annual Performance Report for the Outreach grant through PATH in McLean County for its last operating year (06/01/2018 to 05/31/2019), we can get another snapshot of individuals and families fleeing or attempting to flee domestic violence. Of 287 served people (de-duplicated), 65 said they had experienced domestic violence at some point in their lives. Twelve of those people were men, but the vast majority (82%) with a DV background were women. Of those 65, 18 were actively fleeing or attempting to flee domestic violence. Only one person actively fleeing was a male, meaning that 94% of people actively fleeing or attempting to flee domestic violence are women.

Mid-Central Community Action Agency (MCCA), an area agency helping individuals and families to achieve self-sufficiency, reported serving 744 survivors of domestic violence through their Countering Domestic Violence Program in 2018. MCCA assisted 267 domestic violence victims in filing 424 Orders of Protection and assisted 3,564 callers through their 24-hour hotline in 2018.

YWCA McLean County operates Stepping Stones, the local McLean County sexual assault program, which provides 24-hour telephone assistance for sexual assault and sexual abuse victims and their families in McLean County. The hotline has received around 237 calls in the past year.

What are the most common housing problems?

The top housing issue facing Bloomington residents is the burden of housing costs. Within this category, residents facing housing cost burdens that are greater than 50% of their income make up the majority, followed by residents who face housing cost burdens greater than 30% of their income. However, according to current HUD data, both groups within this category do not face any of the other housing problems that have been determined as notable for the City of Bloomington. These other housing problems include substandard housing and severe overcrowding. This information demonstrates that many low- to moderate-income residents who can adequately afford their housing are living in inferior housing conditions. Substandard housing is characterized as lacking complete plumbing or kitchen facilities, and according to the Housing Needs Assessment provided by HUD, the majority of people living in such conditions are classified as being within 0 to 30 percent of the Area Median Income.

For living conditions that are considered to be overcrowded, HUD has created two categories. The first category characterizes homes with more than 1.51 people per room as "Severely Overcrowded," and the second category describes "Overcrowded" homes as ones with 1.01-1.5 people per room. The City of Bloomington remains aware of these housing issues and works to assist citizens in acquiring healthy and suitable housing. With engaged citizens and community organizations, Bloomington is working towards higher quality housing for its citizens. Recently the City received a grant that will allow for the formation of a healthy housing leadership team, which will further the City

towards the goal of healthier housing for all. Additionally, a portion of the annual CDBG funds that the City receives is allocated towards the housing rehabilitation program, which aims to provide necessary upgrades and home repairs for citizens who may be unable to afford these essential changes.

Are any populations/household types more affected than others by these problems?

Based on 2011-2015 CHAS data, low-income households (those making less than 80% AMI) are clearly the most affected or at risk due to increasing housing cost burdens. Those on fixed incomes (the elderly and persons or families of persons with disabilities) are at an increased risk. The number of renter households with housing cost burdens far exceed the number of households that own their home and experience housing cost burden.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

For low-income households, having a family and friend support network matters. For some people at risk of becoming homeless, they lack this network. This can be due to broken ties with family and friends or because their family and friends also are experiencing poverty and cannot financially assist.

Low-income households need affordable housing and jobs with a living wage. Both of these are typically out of reach for these families.

For individuals who are at risk of becoming homeless, they typically lack family and friend networks, are experiencing circumstances beyond their control (e.g., car broke down and they cannot afford to fix it), and often struggle with various disabilities. Those with severe substance abuse, alcohol abuse, and mental health concerns are at an increased risk of becoming street homeless or cycling in and out of emergency shelters. Without adequate services to address those issues, it becomes difficult for individuals that are low-income to maintain stable housing.

Families with children who are housed but at risk, have certain characteristics that differentiate them from individuals. For families with younger children, childcare can be difficult to afford or otherwise hard to obtain. Families that are large (e.g., 6 or more children) run the risk of becoming homeless because it can be difficult to find affordable 4+ bedroom apartments. Families with female head of households disproportionately experience domestic violence. These families are at imminent risk of homelessness and require more services to protect their safety than standard emergency shelters are able to provide.

When rapid re-housing clients are nearing the end of assistance, their specific needs vary based on the characteristics and specific issues of the clients. Most clients expect to be stable after the financial assistance from the program but may need continued emotional support after the end of assistance. There is a fear of being alone in their struggle to stay stable. Clients on fixed incomes (e.g., SSI, SSDI) express that while they have income to support themselves, the costs of living make it extremely difficult to not live paycheck to paycheck. For some clients, there may be some concerns about maintaining sobriety or keeping up with counseling and/or medication requirements for mental health concerns.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The Central Illinois Continuum of Care (CICoC) uses a 24/7 information and referral call center (PATH 211) as part of the Coordinated Entry System. The call center uses a database that can be searched for specific services and saves the recorded data for later reports. Using this data, CICoC is able to provide an estimate of people who are part of the at-risk population based on the service requested on the call. Someone is considered at-risk when there is a strong likelihood that they are still housed but need some kind of assistance to remain housed. For example, the service terms used for this data are 'rent payment assistance' and 'at risk/homeless housing related assistance programs.' These estimates are based on the number of calls for assistance, not the number of unique individual callers that requested assistance.

From Nov 1, 2018 to Nov 1, 2019, there were 696 rent payment assistance calls to 211 in McLean County. In that same time period, there were 50 at risk/homeless housing related assistance programs calls as well. These numbers include all referred and unmet needs. When an unmet need occurs, this typically means that the caller did not meet eligibility guidelines for the program, the service was out of funds, the service is unavailable because of an eligibility waiting period, or the referral was refused by the caller.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Personal choices along with environmental factors outside of an individual's control can contribute to an increased risk of housing instability or homelessness. Many of these individuals have access only to jobs that do not provide a living wage, or part-time and/or temporary employment. Some individuals experience job loss (e.g., laid off, fired), are unemployed and cannot find any work or similar work to their previous job experiences, and/or lack a steady employment history.

The lack of affordable housing in the area also makes it difficult to find housing once homeless. For many people experiencing homelessness, the cost of housing is too high unless they can receive a subsidy.

Previous incarcerations, especially for particular kinds of crimes (e.g., felonies, sexual offenses) make it difficult to maintain housing and can contribute to issues of poverty.

A lack of access to adequate healthcare can also increase an individual's risk of experiencing homelessness.

The absence of a family safety network to help alleviate housing instability and homelessness is another factor. Even if an individual has such a network, they may also be experiencing poverty and be unable to provide any assistance.

Households with family members who are experiencing some form of disability (i.e., mental illness, drug abuse, alcohol abuse, developmental disability, chronic health condition, physical disability) can not only lead individuals and families into poverty, and then homelessness, but can also exacerbate it. For example, untreated alcohol abuse can make it difficult for an individual to get into emergency shelters.

Central Illinois Continuum of Care (CICoC) data indicates that Black/African American individuals and families have a higher rate of experiencing homelessness compared to White individuals and families. Men are more likely than women to be street homeless, chronically homeless, or reside in emergency shelters than. Single female heads of households with dependent children are at an increased risk of experiencing homelessness. These groups of people face specific barriers, challenges, and constraints in trying to become stably housed or maintain that housing.

Discussion

Enumerating the homeless, or those at-risk of homelessness, is a difficult task and virtually all measures underreport reality. However, CICoC estimates show that certain individuals and families are more vulnerable to experiencing homelessness than others. Those particular groups experience additional barriers and constraints that make it difficult to become stably housed. People are unstably housed or become homeless for environmental reasons beyond their individual control and the personal choices they make. Various life situations can present serious hardships to certain individuals and families and can lead them onto a path of homelessness that can sometimes be difficult to escape without institutional assistance.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

One of the questions on the Citizen Survey asked respondents “Are you able to find safe, sanitary and affordable housing in your community?” About 81% of Bloomington respondents said “Yes” and about 19% of Bloomington respondents said “No.” However, about 31% of respondents in the under \$60,000 annual household income bracket replied that they are not able to find safe, sanitary, and affordable housing in their community. African-Americans responded “No” at an even higher rate (33%). Respondents were asked to elaborate on the previous question by explaining challenges they have faced in finding safe, sanitary and affordable housing in their community. Of those respondents in the under \$60,000 annual household income bracket that elaborated, the top three answers were “Affordability,” “Neighborhood/ Safe Area” and “Property Maintenance/Quality.”

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/ negative income, but none of the other housing problems
Jurisdiction as a whole	3,935	510	340
White	2,480	365	255
Black / African American	1,105	115	85
Asian	100	10	0
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	230	15	0

Table 9 - Disproportionally Greater Need 0 - 30% AMI

Data Source:	2011-2015 CHAS
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*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,975	1,885	0
White	1,475	1,395	0
Black / African American	380	110	0
Asian	10	20	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	105	330	0

Table 10 - Disproportionally Greater Need 30 - 50% AMI

Data Source:	2011-2015 CHAS
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*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,130	3,910	0
White	980	2,890	0
Black / African American	55	595	0
Asian	49	175	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	35	165	0

Table 11 - Disproportionally Greater Need 50 - 80% AMI

Data Source:	2011-2015 CHAS
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*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	435	2,820	0
White	285	2,285	0
Black / African American	0	145	0
Asian	135	205	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	15	140	0

Table 12 - Disproportionally Greater Need 80 - 100% AMI

Data Source:	2011-2015 CHAS
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*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

The City's Black/African American population is disproportionately experiencing housing problems more than other populations. The 2017 ACS 5-Year Estimate indicates the City's Black/African American population at 14.3% of the total population. Yet, 28% of Black/African Americans with an income at or below 30% of AMI has one or more of the four housing problems identified.

The City will continue to offer its housing rehabilitation program to address kitchen and plumbing issues at single-family, owner-occupied residences. Staff continue to struggle with the most effective way to address these issues at rental properties beyond code enforcement. Rental assistance is offered through the City's partnership with Providing Access to Help (PATH). Assistance is limited to no more than 3 months per household which means it's not a long-term solution for those burdened by housing costs. Job training and workforce development will be a higher priority during this Consolidated Plan period than in the past. Creating opportunities for low- and moderate-income residents to learn skills that will enable them to earn a living wage, the City can help reduce barriers to obtaining affordable housing.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

As described in the introduction to NA-15, the Citizen Survey asked respondents, “Are you able to find safe, sanitary, and affordable housing in your community?” About 81% of Bloomington respondents said “Yes,” and about 19% of respondents said “No.” However, about 31% of respondents in the under \$60,000 annual household income bracket replied that they are not able to find safe, sanitary, and affordable housing in their community. Black/African American residents also responded “No” at a higher rate (33%). Respondents were asked to elaborate on the question by explaining the challenges they have faced in finding safe, sanitary, and affordable housing in their community. Of those respondents in the under \$60,000 annual household income bracket that elaborated, the top three answers were “Affordability,” “Neighborhood/Safe Area,” and “Property Maintenance/Quality.”

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,890	1,555	340
White	1,745	1,100	255
Black / African American	845	375	85
Asian	60	45	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	230	15	0

Table 13 – Severe Housing Problems 0 - 30% AMI

Data Source:	2011-2015 CHAS
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*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/ negative income, but none of the other housing problems
Jurisdiction as a whole	555	3,305	0
White	355	2,515	0
Black / African American	165	325	0
Asian	0	35	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	40	395	0

Table 14 – Severe Housing Problems 30 - 50% AMI

Data Source:	2011-2015 CHAS
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*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/ negative income, but none of the other housing problems
Jurisdiction as a whole	230	4,805	0
White	210	3,660	0
Black / African American	0	650	0
Asian	8	215	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	200	0

Table 15 – Severe Housing Problems 50 - 80% AMI

Data Source:	2011-2015 CHAS
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*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	175	3,085	0
White	44	2,520	0
Black / African American	0	145	0
Asian	125	215	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	155	0

Table 16 – Severe Housing Problems 80 - 100% AMI

Data Source:	2011-2015 CHAS
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*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

Black/African American residents appear to disproportionately be affected by severe housing problems. When looking at households with one or more of the four housing problems for residents with an income at or below 30% of AMI, 30% are Black/African American. The percentage remains the same for those with an annual income 30 - 50% of AMI. It increases to 38% for Black/African Americans with an annual income 50 - 80% of AMI. ACS data indicates the Black/African American population in Bloomington at 14.3%.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

As described in the previous sections, the Citizen Survey asked respondents, “Are you able to find safe, sanitary, and affordable housing in your community?” and then asked respondents to elaborate. Regardless of income level, the vast majority of Bloomington residents who answered “No,” or offered anecdotal reasons why high-quality housing is often scarce, stated that affordability was the chief obstacle or challenge for owners and renters. Housing cost burden not only factors in greatly to the affordability of housing nationwide but is also the single most common housing problem encountered by Bloomington residents, per 2011-2015 CHAS data.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	23,260	3,985	3,465	395
White	18,560	3,105	2,210	290
Black / African American	1,530	590	940	105
Asian	1,830	100	65	0
American Indian, Alaska Native	15	4	0	0
Pacific Islander	0	0	0	0
Hispanic	985	165	230	0

Table 17 – Greater Need: Housing Cost Burdens AMI

Data Source:	2011-2015 CHAS
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Discussion:

Data indicate that White households meeting the criteria for an annual household income at or below 30% of AMI have the highest rate of housing cost burden, followed closely by those with an income 30% - 50% of AMI. Black/African American's with annual household incomes 30-50% of AMI and 50-80% of AMI are also disproportionately affected by housing cost burdens.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Data from tables within the Needs Assessment indicate that the needs are greatest across all race categories when the annual household income is 50% of AMI or less. Black/African American residents within this income bracket are disproportionately represented. Data collected from the Citizen Survey indicates that this population has a harder time finding safe, sanitary affordable housing as well.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

The 61701 zip code has the highest number of low/moderate income census tracts. This area also has a higher percentage of rental properties compared to the City as a whole and the oldest housing stock. As a result, this area will be the primary target area for housing initiatives conducted during this Consolidated Plan period.

NA-35 Public Housing – 91.205(b)

Introduction

The data listed above is exclusively for Bloomington Housing Authority (BHA). BHA also administers Section 8 Housing Choice Vouchers on behalf of McLean County Housing Authority (MCHA). As of October 2019, another 255 vouchers were administered for MCHA. All vouchers (BHA and MCHA) are administered without regard to municipal boundaries—tenants may lease units in Bloomington, Normal, or elsewhere within McLean County. Other statistical data for voucher program participants presented in this section are for BHA vouchers but can generally be extrapolated to also describe users of vouchers issued by MCHA.

The Housing Authority is authorized to issue up to 458 BHA vouchers and up to 316 MCHA vouchers. However, the annual appropriation from the federal government for the Section 8 Housing Choice Voucher program limits housing authorities from issuing the full number of authorized vouchers. Because of this and other features of the program, the number of vouchers in use will vary from year to year.

Totals in Use

Program Type									
	Certificate		Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	14	548	408	0	407	0	0	0

Table 18 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source:	PIC (PIH Information Center)
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Characteristics of Residents

Program Type								
	Certificate		Public Housing	Vouchers				
				Total	Project-based	Tenant-based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	7,415	11,381	12,019	0	12,022	0	0
Average length of stay	0	3	5	6	0	6	0	0
Average Household size	0	1	1	2	0	2	0	0
# Homeless at admission	0	5	31	1	0	1	0	0
# of Elderly Program Participants (>62)	0	2	146	36	0	36	0	0
# of Disabled Families	0	5	145	105	0	105	0	0
# of Families requesting accessibility features	0	14	548	408	0	407	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 20 – Characteristics of Public Housing Residents by Program Type

Data Source:	PIC (PIH Information Center)
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Race of Residents

Program Type									
Race	Certificate		Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	8	309	126	0	125	0	0	0
Black/African American	0	6	234	282	0	282	0	0	0
Asian	0	0	3	0	0	0	0	0	0
American Indian/Alaska Native	0	0	2	0	0	0	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 21 – Race of Public Housing Residents by Program Type

Data Source:	PIC (PIH Information Center)
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Ethnicity of Residents

Program Type									
Ethnicity	Certificate		Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	10	4	0	4	0	0	0
Not Hispanic	0	14	538	404	0	403	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 22 – Ethnicity of Public Housing Residents by Program Type

Data Source:	PIC (PIH Information Center)
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Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Of the 561 households occupying public housing units in October 2019, nine households were on the waiting list to be transferred to units with an accessibility feature of some type. There are typically a variety of accessibility needs reflected on the transfer list, but the most common request is for a unit without stairs or a unit with additional space and grab bars to assist a household member with mobility impairments. Another example of accommodation request is for an additional bedroom to provide a separate bedroom for a child with a disability.

The Housing Authority's current inventory of 611 leasable units includes a variety of unit types and features, including units that are fully ADA compliant (the Housing Authority provides in excess of the minimum number of ADA compliant units required by federal regulation). As the Housing Authority has renovated units, additional accessibility features are added when practical. For instance, roll-in showers and extra grab bars were installed in the bathrooms of all 12 of the units in Wood Hill Towers-North that have been renovated in the last three years.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

A number of the needs of public housing tenants with disabilities can be accommodated without a transfer. Public housing applicants are notified of the process for requesting an accommodation for a disability, and they receive similar notifications at the time of move-in and at regular intervals during their tenancy. Typical non-transfer accommodations include installation of grab bars, installation of strobe-light smoke detectors/fire alarms, and permission for an emotional support/service animal.

There were 51 households on the waiting list for public housing as of October 29, 2019. Of these 11 met the HUD definition of "disabled," but only three had specific accommodation needs indicated on the waiting list.

How do these needs compare to the housing needs of the population at large?

As they related to disability and accommodation, the housing needs of the population at large are difficult to ascertain because of the wide range of needs and accommodations. There is reason to believe that the public housing tenant and waiting list population is a reasonable representation of the population at large. There seems to be a growing need for housing accommodations as the general population ages.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The needs of people experiencing homelessness are variable. However, specific needs arise based on certain shared characteristics. For example, the chronically homeless, families with dependent children, Veterans, unaccompanied youth, people with disabilities (and the extent of that disability), and those with specific criminal backgrounds all exhibit particular needs. The focus of these needs tends toward the individual. This is because structural conditions of homelessness (e.g., availability of jobs, living wages, affordability of housing, affordability of childcare, availability of healthcare) are beyond the ability of stakeholders to immediately address.

If data is not available for the categories “number of persons becoming and exiting homelessness each year,” and “number of days that persons experience homelessness,” describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

The data available for the “number of persons becoming and exiting homelessness each year,” and “number of days that persons experience homelessness” was only able to come from the entire Central Illinois Continuum of Care’s FY18 System Performance Measures. While not specific to the City of Bloomington, it provides a snap-shot that can allow stakeholders to make sense of the transition in and out of homelessness.

Becoming Homeless:

- There were 935 people from emergency shelters and transitional housing projects that became homeless. Of that, 754 of those were homeless for the first time.
- In some cases, people exit homelessness to permanent housing and then return to homelessness at some point due to the instability in their lives. There were 292 people who returned to homelessness after previously having been housed. Exiting Homelessness:
- There were 460 out of 928 exits from emergency shelters, transitional housing, and permanent housing-rapid rehousing that successfully placed someone in stable, permanent housing. This is a 50% success rate.
- There were 51 of 159 successful exits from street outreach. That is a 32% success rate. Length of time Homeless:
- The mean average length of time for people experiencing homelessness in emergency shelters and transitional housing is 100 days. The mean average length of time for those just in emergency shelters it is 83 days.
- The median length of time for people experiencing homelessness is 49 days for those in emergency shelters and transitional housing. The median length of time for people experiencing homelessness is 44 days in emergency shelter. When compared with the mean average length of time, we can see that there are people experiencing homelessness that skew the numbers for a higher mean average.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	86	21
Black or African American	78	5
Asian	1	0
American Indian or Alaska Native	1	0
Pacific Islander	0	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	5	0
Not Hispanic	168	26

Data Source Comments:	
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Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

According to the 2019 Point In Time (PIT) count conducted by the Central Illinois Continuum of Care (CICoC), there were 19 households (55 persons) with at least one adult and one child experiencing homelessness in McLean County. Ten of those households were sheltered in emergency shelters and 9 in transitional housing. No family households were unsheltered. Of the 55 persons, 35 were children under 18 and 20 were young adults or adults age 18 and over. The count found 9 parenting youth households, all of which were sheltered in temporary housing.

The 2019 PIT did not find any veteran households with at least one adult and one child. The PIT reported 10 veteran households without children (10 persons). Four of those households were sheltered in emergency shelters, 4 in transitional housing and 2 were unsheltered. All veteran households were male, non-Hispanic/non-Latino, and white. Additionally, 3 veterans were identified as chronically homeless.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

The majority of persons experiencing homelessness in McLean County in 2019 were either Black or African-American or White. Households with at least one adult and one child were more likely to be African-American or Black (39) than White (11), while households without children were more likely to be White (91) than Black or African-American (44). All 10 veteran households without children were White. Youth households were more likely to be Black or African-American (22) than White (8). Only 5 households experiencing homelessness were Latino/Hispanic, while 168 were Non-Latino/Non-Hispanic.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The unsheltered homeless, according to the 2019 PIT count, account for about 13 percent of all people experiencing homelessness. The PIT count occurs in the last 10 days of January. Given the climate of Central Illinois, it is likely that more people experience unsheltered homelessness during warmer months of the year. Those that experience unsheltered homelessness face additional barriers and challenges to getting housed and gaining access to emergency shelter.

Program rules and structure can bar certain individuals or families from gaining access to emergency shelter (e.g., needing a valid ID, needing a police clearance card to gain access, having been previously banned from services). The unsheltered homeless can also have severe forms of disability (e.g., substance abuse, alcohol abuse, mental illness, cognitive disability, physical disability) that makes it difficult to interact with others, follow emergency shelter program rules, gain employment, or take care of oneself.

For registered sex offenders, neither shelter can take them in for legal reasons. Therefore, registered sex offenders who are experiencing homelessness are stuck in street life because of institutional barriers. Some people choose not to receive assistance from shelters because of previous experiences that were perceived as negative or traumatic and they lack trust in the network of service providers. Lastly, some people are banned from both shelters for breaking program rules. In these cases, depending on the rule infraction, they could be indefinite (e.g., committing acts of violence) or they could be temporary and conditional (i.e., in order to get back in one must attend substance abuse classes).

It is for these reasons that the unsheltered population are the most vulnerable and in need of assistance. However, given the high level of needs, they often end up not receiving certain kinds of services.

The sheltered population is made up of people who are living in emergency shelters and transitional housing. Individuals in emergency shelters make up 81% (141) of the sheltered population, while those in transitional housing they make up about 19% (32). Given the lack of transitional housing units available, most people who become sheltered are in an emergency shelter. Youth up to the age of 23 gain emergency shelter through Project Oz. The characteristics of youth are different from older adults who are sheltered and homeless. Youth are at a greater risk of being kicked out by their parents for being LGBTQ+. They also lack employment history and various life skills necessary to maintain housing once they get it. There are two shelters that serve the Bloomington-Normal community. Home Sweet Home Ministries is generally more restrictive in its access and is a sober shelter. Salvation Army Safe Harbor is less restrictive and is a non-sober shelter. Many residents who end up at Home Sweet Home Ministries have less severe issues than those at Safe Harbor. Regardless of the shelter, individuals and families must be capable of congregate living with rules and structure.

Discussion:

The needs of people experiencing homelessness is influenced by several important characteristics: veteran status, individual vs family, unsheltered vs. sheltered, actively fleeing domestic violence, race, ethnicity, gender, sexuality, criminal background. Those needs are also situated within a context of structural conditions that are beyond the individual control of people experiencing homelessness (e.g., the job market, housing affordability).

The network of services for the City of Bloomington is able to hone into those specific needs. For example, the Central Illinois Continuum of Care was recognized for effectively ending Veteran homelessness. That means that once identified as experiencing homelessness, we are able to house them within 90 days or less. An infrastructure is in place that is able to meet their specific needs. While the extent of such infrastructure is not in place for some of these other categories (e.g., families) or there is a gap (e.g., registered sex offenders), there are services in place to assist people and look at their unique cases to determine how best to serve them. When such gaps exist, Outreach is able to provide services to anyone regardless of their category, provided they meet the standard HUD definition of homelessness. Current work is underway to look further into the gaps of services for specific types of people experiencing homelessness. Additionally, the Continuum as a whole is developing a race and ethnicity equity tool to determine the effects of race and ethnicity on the provision of services.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

“Health Services” and “Mental Health Services” came up frequently in the Citizen Survey as services that should be added or expanded in the community. This rang true throughout all demographic categories. The issue was also brought up at public meetings, where attendees discussed addressing mental health needs through wrap-around services, with specific needs for youth and LGBTQ youth mentioned. Stakeholders also discussed the need for mental health services but pointed out that safe, stable housing is an important component of mental health. The 2019 Community Health Needs Assessment identified Behavioral Health (including Mental Health and Substance Abuse) as one of three health needs to be addressed in the 2020-2022 McLean County Community Health Improvement Plan.

The need for additional or expanded “Child Care Services” also came up frequently in the Citizen Survey. Many of the comments received related to child care referenced the need for expanded services at night and assistance with child care costs. Child care also came up as a response to the question “What type of assistance will help expand job and economic opportunities for low- to moderate-income residents in your community?” This was an open-ended question, so the fact that so many associated child care assistance with job and economic opportunities speaks to the need. One response stated, “Child care assistance to help working parents with young kids (is needed) - often low-income families would need to pay more in childcare costs than a low-skilled position would provide in income.” This ties into the identified need for more job training and workforce development.

Furthermore, people with physical and developmental disabilities, as well as the elderly, compose the special needs population in the area. Comments related to the difficulties these populations face finding employment and safe, sanitary and affordable housing came up in multiple areas of the Citizen Survey. Below are two notable quotes from the Citizen Survey:

“As a community, we lack updated and affordable smaller homes appropriate for senior citizens who no longer need 4 bedroom, 2-story homes but are not looking for assisted living developments. Most of what is available is on multiple levels and is in the \$300,000 range.”

“Individuals with disabilities (specifically those with autism) who need support have limited to no options available to them. They need varying levels of support, access to services, in-home accommodations. Many of the individuals have limited income, so affordable housing is needed.”

Describe the characteristics of special needs populations in your community:

Mental Health issues can affect anyone, but the 2019 McLean County Community Health Needs Assessment found that the highest emergency room rates due to mental health in McLean County occur in:

- Individuals 18 - 24 years (126.8 emergency room visits per 10,000 population 18+ years);
- Individuals 25 - 34 years (134.9 emergency room visits per 10,000 population 18+ years);
- Females (102.5 emergency room visits per 10,000 population 18+ years);
- Blacks or African Americans (190.7 emergency room visits per 10,000 population 18+ years);
- Bloomington ZIP code 61701 (175.3 emergency room visits per 10,000 population 18+ years).

The Needs Assessment also found that several characteristics show a significant relationship with an individual's behavioral health. Those are:

- Depression and anxiety tend to be rated higher by older people, those with lower education and income and those with an unstable (e.g., homeless) housing environment;
- Frequency of self-medication tends to be rated higher for those with an unstable (e.g., homeless) housing environment (McLean County Community Health Survey, 2018).

According to the American Community Survey (ACS) 2013-2017 5-year estimates, 16,410 individuals living in McLean County have a disability, which is about 10% of the total population. The American Community Survey (ACS) attempts to capture six aspects of disability (hearing difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty or independent living difficulty), which can be used together to create an overall disability measure, or independently to identify populations with specific disability types.

It is difficult to ascertain the entire scope of those living with disabilities and their needs, as the ACS data do not fully capture the scope of all disabilities.

In McLean County, the ratio of the population aged 65 and over (generally retired) compared to those of working age is trending upward. As this population continues to grow, the demand for accessible housing, transportation and other services will also increase. The former Bloomington High School is currently being renovated using Low Income Housing Tax Credits to create 50 affordable senior apartments. The City anticipates offering rental assistance at four units. The project is scheduled to be completed in 2020.

What are the housing and supportive service needs of these populations and how are these needs determined?

The housing and supportive service needs of these populations are as diverse as the populations themselves. During the Stakeholder Focus Groups, organizations that work with these populations daily offered some insight into their needs.

Organizations that treat persons with serious mental illness or substance abuse issues mentioned that there is a need for a larger pool of landlords who are willing to house these populations in partnership with supportive service providers. They mentioned that there are a few landlords in the community that are actively working with health partners in the community to house these populations and that they could potentially serve as “landlord champions” to help convince other landlords to start housing these populations. Service providers also mentioned that permanent, as opposed to group or transitory housing, is a need for this population.

Organizations that serve persons with disabilities frequently mentioned the need for more physically accessible housing and that universal design can meet the needs of many special populations. More integrated housing (group homes within traditional neighborhoods) was also mentioned, along with a need for group housing with 24/7 support services for certain populations. Service providers also identified a gap in supportive services for youth with disabilities. Another need that was continuously brought up throughout the Focus Groups was the need for additional employees to provide supportive services. Providers also expressed fear that the impending increase of the minimum wage to \$15/hr. could negatively impact the number of supportive services that organizations, especially nonprofits, will be able to provide. Additionally, parents of teens and young adults with autism expressed a need for autism-friendly supportive housing for their children, especially as they become incapable of providing for the care themselves.

Organizations that serve the elderly discussed that there is a perception of a variety of housing options for seniors. In reality, however, housing for low- to moderate-income seniors is lacking. Also mentioned was the need for supportive services and universal housing design for accessibility. One focus group attendee said that her organization serves several seniors who are raising their grandchildren, and that they may have different housing needs than the general senior population.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

According to the Illinois Department of Public Health, the HIV diagnosis rate in McLean County between 2012-2019 is 6.6. As of 1/31/2019, there are 109 individuals living with HIV (non-AIDS) in McLean County and 92 individuals living with AIDS.

Discussion:

According to the 2019 McLean County Community Health Needs Assessment, referencing Illinois Department of Public Health (IDPH) data, there were sixteen newly diagnosed cases of HIV in McLean County and four newly diagnosed cases of AIDS in 2017. The Needs Assessment also cited a review of McLean County deaths (preliminary data) occurring January- October 2018 that indicated no deaths due to HIV.

In 2019, the Illinois Department of Public Health, the Chicago Department of Public Health and the AIDS Foundation of Chicago introduced a new five-year plan to end the HIV epidemic in Illinois by 2030 using the Getting to Zero Illinois (GTZ-IL) initiative. The plan includes strategies to reduce the number of new HIV infections to assist Illinois in reaching “functional zero,” the point at which the HIV epidemic cannot be sustained.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

The City has identified the following public facilities as top priority funding areas for the 2020-2024 Consolidated Plan period:

- Accessibility Improvements
- Parks and Community/Recreation Centers
- Bus Facility Improvements

How were these needs determined?

The City utilized data collected during the citizen and stakeholder engagement process to prioritize public facility needs. The Citizen Survey asked the question “What type of public facilities would you like to see added or expanded in your community?” The top answers for respondents with an annual household income under \$100,000 were homeless facilities, community centers, recreation centers, public parks and gathering spaces, bus facility improvements and accessibility improvements.

The Stakeholder Survey asked a similar question with comparable results. Once the survey closed, the City provided several opportunities for citizens and stakeholders to engage face-to-face with staff. Five stakeholder focus groups organized around the top priorities identified through the citizen and stakeholder surveys were conducted. The City also held a public meeting open to the community. The public meeting and other in-person interaction helped to narrow down the focus for funding prioritization. For instance, stakeholders ranked homeless facilities fairly high on the survey but indicated during the focus group that services and permanent supportive housing units were a higher need than more shelter beds.

Each activity was scored based on its ranking from all Bloomington residents, low-income Bloomington residents, the stakeholder survey and public meeting resource allocation activity. City staff provided additional scores for each activity based on its dependence on CDBG, alignment with CDBG's goals and objectives, and effective use of the funding. Consideration was also given to the City's 2015 Comprehensive Plan goals and applicable master plans.

Describe the jurisdiction's need for Public Improvements:

The City has identified the following public improvements as top priority funding areas for the 2020-2024 Consolidated Plan period:

- Accessibility Improvements
- Sidewalk Improvements
- Water/Sewer Improvements
- Demolition of Blighted Structures

How were these needs determined?

The same process was used to determine the public improvement needs as described above. The public meeting and stakeholder focus groups helped to narrow down the focus areas for priority funding. The survey tools listed “Streets/Sidewalk Improvements” as a single response. When meeting face-to-face, it became apparent that most people felt sidewalk improvements, particularly ADA improvements, was a better use of CDBG funding than street improvements. They also indicated that private water and sewer improvements should be prioritized over public water and sewer.

Describe the jurisdiction's need for Public Services:

The City has identified the following public services as top priority funding areas for the 2020-2024 Consolidated Plan period:

- Crime Prevention and Awareness (High)
- Job Training and Workforce Development (High)
- Homeless Services (High)
- Housing Discrimination Services (High)
- Renter Assistance (High)
- Senior Services (High)
- Youth Services (High)
- Child Care Services (Medium)
- Disability Services (Medium)
- Food Services (Medium)
- Health Services (Medium)
- Mental Health Services (Medium)

How were these needs determined?

The above public service areas were prioritized using the same method as public facilities and public improvements. Due to the number of needs prioritized as “High” for public services in addition to HUD’s 15% spending cap on these types of projects, it is highly unlikely the City will address more than 2-3 areas with CDBG funding during this Consolidated Plan period. The City will support agency efforts to obtain additional funding in these areas via partnerships, letters of support and Consolidated Plan Consistency documentation when appropriate. The City will continue to seek additional grant resources to address the prioritized areas with non-CDBG funding. Staff will also consider ways to use non-service CDBG dollars to address prioritized needs. One example would be securing funding to train staff in the Crime Prevention Through Environmental Design (CPTED) program, a program that looks at improvements to the built environment to deter crime, then utilize the City’s CDBG funding to address issues such as housing security and lighting improvements.



Housing Market Analysis



Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The Regional Housing Study, completed in 2017, provides a general overview of the housing market in McLean County. As mentioned previously, the study found that McLean County is generally overbuilt, meaning that there is more housing than can be absorbed. Approximately two-thirds of McLean County housing units are single-family structures. While comparing the number of housing units to the number of households provides a general overview of how supply and demand are in balance, there are other factors that indicate whether there is a need for additional housing. Some households desire a new house, even if there is an adequate number of existing units from which to select a dwelling. The existing available housing may be largely for rent when households are looking for a unit to purchase or the sizes of the houses available may be too large or too small for the households seeking housing. An analysis of the housing stock in McLean County indicates that between 2000 and 2010 the number of housing units with three or more bedrooms increased by more than 10,300 while the County added only 2,500 households with three or more persons. In contrast, the County added about 5,500 one- and two-person households but only 2,500 housing units with zero to two bedrooms; about 62% are single-family detached units and 4.5% are attached. Mobile homes make up another 4% of the units. As households shrink in size, they generally shrink their demand for the size of their housing unit as well. Households are having fewer children and there is an aging population, which are both shrinking the average household size. Therefore, there will be a greater need for smaller housing units in the future.

The McLean County Regional Planning Commission's Annual BN (Bloomington-Normal) Vitals Analysis for 2018 found that new residential construction and sales are down, but residential resales are trending up. The increase in median home value year over year is about 1% on average and is likely due to home values appreciating slightly on an annual basis. The median home value in McLean County according to the 2013-2017 ACS 5 Year estimates is \$163,800. Such narrow appreciation rates mean that the market is almost in equilibrium. Median gross rent has also been trending upward in McLean County and stands at \$811, according to the 2013-2017 ACS 5-Year Estimates. Median gross rent by census tract varies between \$649 at the low end and \$1,463 at the high end, according to ACS. While home prices and rents are relatively affordable in McLean County, low-income households still struggle to find housing that is safe, sanitary and affordable.

Comments received through the Citizen Survey elaborate on the struggles that many households face in the McLean County housing market:

"I can find safe, and sanitary housing. It's the affordable housing that is lacking. Unless you have perfect credit. Our family goes through great financial sacrifice to live in a safe and sanitary home. Because the affordable housing is NOT safe or sanitary. You can't find all 3 in one."

"I work a job that I get paid \$12 an hour at. Finding a place with affordable rent is impossible. I cannot afford a rent that is over \$400 due to all the other bills I have to pay on a monthly basis. On top of paying for food, and gas, or other things that I would not normally account for."

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	18,980	56%
1-unit, attached structure	1,650	5%
2-4 units	3,370	10%
5-19 units	5,805	17%
20 or more units	2,185	6%
Mobile Home, boat, RV, van, etc.	1,700	5%
Total	33,690	100%

Table 1 – Residential Properties by Unit Number

Data	2011-2015 ACS
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Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	0	0%	565	5%
1 bedroom	270	1%	3,280	27%
2 bedrooms	3,485	18%	5,790	48%
3 or more bedrooms	15,380	80%	2,340	20%
Total	19,135	99%	11,975	100%

Table 2 – Unit Size by Tenure

Data Source:	2011-2015 ACS
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Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

As discussed previously, the Regional Housing Staff Advisory Committee published a white paper examining the different types of “income-qualified” housing in McLean County (2019). Income-qualified housing includes Low Income Housing Tax Credit (LIHTC) units, Project Based Section 8 Rental Assistance (PBRA) units, USDA Section 515 Rural Multifamily Housing units, Public Housing units and Section 8 Housing Choice Vouchers. Data used in this analysis came from the Illinois Housing Development Authority (IHDA), Department of Housing and Urban Development (HUD), and Bloomington Housing Authority (BHA).

The primary source of development funding for creating and maintaining affordable housing is the Low Income Housing Tax Credit (LIHTC), a competitive federal tax credit that subsidizes the acquisition, construction and rehabilitation of affordable housing for low- and moderate-income households. In McLean County, there are 23 properties and a total of 1,721 units that are assisted by LIHTC. Based on HUD FY19 income limits, a household of 4 people living in McLean County would have to earn \$44,150 or less in order to be considered 50% AMI.

Project-Based Section 8 Rental Assistance (PBRA) is a public-private partnership to build and maintain affordable rental units for low-income persons. PBRA makes up the difference between market rents and what low-income tenants can afford based on paying 30 percent of household income for rent. In McLean County, there are 7 properties and 640 units that are assisted by PBRA. Of those 640 units, 474 are also assisted by LIHTC, meaning that 166 units in McLean County are assisted by PBRA only. Based on HUD FY19 income limits, a household of 4 people living in McLean County would have to earn \$70,650 or less in order to be considered 80% AMI, or \$26,500 or less in order to be considered 30% AMI.

Public housing units are owned and managed by the local Public Housing Authority (PHA). Income requirements vary, but most units are targeted to households below 50% AMI. Households pay 30% of their income in rent, and the difference between the tenant payment and the actual rent is then covered by an operating subsidy from HUD. In McLean County, there are 614 public housing units.

The federal government (HUD) provides Housing Choice Vouchers to low-income and very-low-income individuals and households to find decent, affordable housing in the private market. By law, a PHA must provide 75% of its vouchers to households whose incomes do not exceed 30% of the area median income. Through the voucher program, the PHA will pay the balance of a rent payment that exceeds 30% of the renter's monthly income, provided that the rental amount is at or below the payment standards (established by the local PHA to be between 90% and 110% of fair market rents published by HUD). In McLean County, there are between 650 and 680 Section 8 Housing Choice Vouchers in use at any given time.

In total, there are 3,227-3,257 income-qualified units and vouchers in McLean County.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

The same white paper on "income-qualified" housing in McLean County also examined the expiration dates on contracts, income restrictions and loans tied to these properties.

A LIHTC property is monitored for 15 years by the federal government to ensure it is not exceeding maximum rents and maintaining appropriate property standards, and then for an additional 15 years by the State Housing Finance Authority. As properties age, owners can apply for a new round of tax credits to fund the substantial capital investments most likely needed for rehabilitation work at that time. In this scenario, owners are competing against new projects for the same allocation of competitive funding. Owners who do not apply for a new round of credits can still rent their units at LIHTC rent levels, but they also have the option to lease at market rents. Even if the rents remain affordable, the units will no longer be restricted to low- to moderate-income households. In the next 10 years, 625 of the 1,721 LIHTC units in McLean County will reach their 30-year expiration and face a potential loss of affordability or income restriction.

PBRA contracts initially last 20–40 years based on the initial mortgage obtained through the Federal Housing Administration (FHA), then can be renewed in 1-, 5-, or 20-year increments. If an owner exits the program upon contract expiration or pays off their mortgage early, tenants are offered a voucher that can be used to rent their existing unit or to rent a unit elsewhere in the community. However, once that contract ends, the subsidy is no longer tied to the property and the owner may set the rent at any price. As with LIHTC properties, even if rents remain affordable due to market conditions, the units will no longer be restricted to low- to moderate-income households. In the next 10 years, 266 out of 640 PBRA units in McLean County will reach the end of their current contracts and face a potential loss of affordability in the form of income-restricted units. Some of these units are also assisted by LIHTC and would maintain LIHTC affordability after the PBRA contract ends.

Affordability contracts for USDA Section 515 properties expire upon loan maturation date. Owners who want to remain in the program must apply for a new round of funding. With federal funding levels for this program trending downward, there are fewer resources to spread between building new units and preserving existing units. If owners aren't able to access new capital when their loan matures, they may choose to exit the program. In the next 10 years, 27 of 117 units in McLean County will reach their loan maturation date and face a loss of affordability or income restriction. Some of these units are also assisted by LIHTC and would maintain LIHTC affordability after the Section 515 contract ends.

Does the availability of housing units meet the needs of the population?

Describe the need for specific types of housing:

As mentioned previously, the average household size in McLean County has been shrinking, while single-family detached

housing continues to be the predominant type of housing available (62% of all housing units according to ACS 2013-2017 5 Year Estimates). The majority of the multi-family housing built in recent years has been student housing. New or renovated multi-family units, especially those that come with financial assistance targeted at households with very low incomes, are a need in McLean County. Typically, this is done through a combination of subsidies such as the Low Income Housing Tax Credit (LIHTC) and Project Based Section 8 Rental Assistance (PBRA). A proposed 56 unit affordable housing development in Bloomington was approved for tax credits to provide 41 units set aside for 60% of the area median income (AMI) and below, and the remaining 15 for those 30% AMI or below. Bloomington Housing Authority will also provide project-based vouchers to subsidize rents for 17 of the apartments based on tenants' income.

Housing for seniors is also a need in McLean County. The 2017 Regional Housing Study (BN Home) found that while there are more than 1,000 privately owned age- and income-restricted properties, elderly households with incomes between \$25,000 and \$35,000 have fewer age-restricted housing options. The study estimated a need for as many as 300 units of LIHTC age-restricted housing priced to be affordable to households with incomes between 40 and 60% of area median income. There is also a need for options to help seniors age in place. Accessibility improvements help seniors stay in their homes, and that came up frequently in the survey. Access to in-home support services was also brought up in focus groups as a way to help seniors age in place.

Specialized housing for persons with disabilities is another need in McLean County. This includes people with physical as well as mental impairments or substance abuse issues. Every individual living with a disability is different, so there are a wide range of housing situations that are appropriate for this population. Some can live independently with little or no modifications to their living space, while others require a number of accessibility improvements and/or supports. Among persons with disabilities, as with the general population, the segment most likely to need housing assistance are those persons with the lowest incomes. As with the senior population, many people living with disabilities require housing with accessibility improvements or universal visitability design.

Discussion

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction:

According to the 2013-2017 American Community Survey (ACS) 5 Year estimates, the median home value in McLean County is \$163,800. While that value is lower than the median for the United States (\$193,500) and Illinois (\$179,700), it is higher than the medians for 5 comparative counties in Illinois (Champaign, Sangamon, Winnebago, Peoria and Macon Counties). However, the quality of the housing stock is not fully known. One survey respondent stated that you “could not buy a decent house for under \$130,000.”

The 2013-2017 ACS data reports that the median gross rent in McLean County is \$811. This value is also lower than the median for the United States (\$982) and Illinois (\$952), yet higher than the medians for the comparative counties, save for one. Each year the National Low Income Housing Coalition publishes a report titled “Out of Reach” that documents the gap between renters’ wages and the cost of rental housing across the United States. The report’s central statistic, the Housing Wage, is an estimate of the hourly wage a full-time worker must earn to afford a modest rental home at HUD’s fair market rent (FMR) without spending more than 30% of his or her income on housing costs, the accepted standard of affordability. The 2019 report found that a worker making minimum wage (\$8.25/hr.) in McLean County would need to work 85 hours a week in order to afford a modest one bedroom rental at fair market rent. The annual income needed to afford a two bedroom rental is \$33,840. (National Low Income Housing Coalition, Out of Reach 2019: Illinois)

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	149,700	163,800	9%
Median Contract Rent	580	653	13%

Table 3 - Cost of Housing

Data Source:	2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)
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Rent Paid	Number	%
Less than \$500	2,925	24.4%
\$500-999	8,090	67.6%
\$1,000-1,499	665	5.6%
\$1,500-1,999	100	0.8%
\$2,000 or more	205	1.7%
Total	11,985	100.1%

Table 4 - Rent Paid

Data	2011-2015 ACS
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Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	1,310	No Data
50% HAMFI	5,580	2,510
80% HAMFI	8,450	5,920
100% HAMFI	No Data	7,920
Total	15,340	16,350

Table 5 - Housing Affordability

Data	2011-2015 CHAS
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Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	0	0	0	0	0
High HOME Rent	0	0	0	0	0
Low HOME Rent	0	0	0	0	0

Table 6 – Monthly Rent

Data Source Comments:	
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Is there sufficient housing for households at all income levels?

There is not sufficient housing for households at all income levels in McLean County. Households with very low incomes have fewer affordable housing options available to them than other income brackets.

How is affordability of housing likely to change considering changes to home values and/or rents?

As mentioned previously, the increase in median home value year over year in McLean County is about 1% on average. This trend is expected to continue, as will issues that certain populations face when searching for decent, safe and affordable housing to purchase. Median rent, however, has increased at a higher rate than home values. According to the American Community Survey (ACS) 5 Year data, the median rent in McLean County for the 2006-2010 period was \$692, while the median rent for the 2013-2017 period was \$811. That is about a 16% difference, or an increase of over 2% per year. Certain areas of the community, however, have median rents that have increased at higher rates. Increases in median rent are more likely to affect the low- to moderate-income populations, as they are more likely to rent than households with higher incomes.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

According to the Department of Housing and Urban Development (HUD), the Area Median Rent in McLean County in 2019 for a 2-bedroom apartment is \$886, which is higher than the Fair Market Rent as well as the High and Low HOME Rents. The National Low Income Housing Coalition's 2019 Out of Reach report states that this rent is \$165 higher than the monthly rate that would be affordable at the mean renter hourly wage of \$13.99.

When taken in conjunction with the research completed by the Regional Housing Committee, these numbers indicate a lack of affordable housing in McLean County. The Committee has determined that preservation and production are both an important part of an affordable housing strategy. With the cost of new construction continually rising, new affordable housing developments will most likely need to secure Low Income Housing Tax Credits (LIHTC) in order to come to fruition. With LIHTC allocations falling and competition increasing, McLean County cannot afford to rely on new construction alone to fill the gap in affordable housing. Preservation of both "income-qualified" housing at risk of losing its affordability and the current stock of naturally occurring affordable housing will be important priorities in the years to come.

Discussion:

All of the data referenced in this section provides a quantitative look at the cost of housing in McLean County. Qualitative data, however, really tells the story of the struggles people face when trying to find safe, sanitary and affordable housing. Responses to the Citizen survey include:

"Rent is very expensive in most places. As a teacher, I cannot afford to get a single apartment that is safe for a person living alone that is also clean. We need more basic apartments and not these granite countertop fancy ones that charge ridiculous amounts. Living is supposed to be 25% of a paycheck. For those in apartments, if you want a decent one, you're forced to pay more than 25% or live in unsanitary conditions."

"The cost of housing, especially rentals are too high. I have children so when looking at affordable places to live, they are attached to failing schools. The schools doing well have housing too high to afford. This perpetuates the age old cycle of poverty."

"In searching for an apartment that was within my price range in a location that was close to the bus that would take me to school and work, I was not able to locate a place where my total household expenses is 30% of my income. I am currently paying 42% of my income to household cost alone (rent, utilities(water, gas, electric, internet), renters insurance)."

"When we were younger and just starting out, the price of good, clean apartments in this community surprised us. It was very difficult to find what we needed in a good neighborhood, without paying \$800-\$1,000 a month."

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

According to the data referenced below, owner-occupied housing tends to be in better condition than renter-occupied housing. Comments received related to the condition of housing from the Citizen Surveys include:

“The majority of properties that are economical are run down and belong to property owners who don’t care about the safety of their tenants.”

“We currently live in a complex that has some challenging neighbors and it may be days before anyone shows up to address an issue with our place. The rent continues to rise and the quality conditions continue to decrease.”

The City addresses housing conditions in a variety of ways including but not limited to providing single-family owner-occupied housing rehabilitation, implementation of a rental registration and inspection program, and code enforcement for property maintenance. In 2015, the City achieved its goal of implementing an administrative court as a tool for gaining compliance related to property maintenance issues.

Definitions

According to HUD, Lead-Based Paint is defined as paint or other surface coatings that contain lead equal to or exceeding 1.0 milligram per square centimeter or 0.5 percent by weight or 5,000 parts per million (ppm) by weight. Lead is a highly toxic metal that may cause a range of health problems, especially in young children. When lead is absorbed into the body, it can cause damage to the brain and other vital organs, like the kidneys, nerves, and blood. Lead may also cause behavioral problems, learning disabilities, seizures and, in extreme cases, death. Some symptoms of lead poisoning may include headaches, stomachaches, nausea, tiredness and irritability. Children who are lead poisoned may show no symptoms.

According to the American Community Survey (ACS) the variable “Selected Conditions” is defined for owner- and renter-occupied housing units as having at least one of the following conditions: 1) lacking complete plumbing facilities, 2) lacking complete kitchen facilities, 3) with 1.01 or more occupants per room, 4) selected monthly owner costs as a percentage of household income greater than 30 percent, and 5) gross rent as a percentage of household income greater than 30 percent.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	2,930	15%	4,595	38%
With two selected Conditions	10	0%	305	3%
With three selected Conditions	0	0%	20	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	16,195	85%	7,055	59%
Total	19,135	100%	11,975	100%

Table 7 - Condition of Units

Data	2011-2015 ACS
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Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	4,080	21%	1,975	16%
1980-1999	6,065	32%	3,320	28%
1950-1979	4,980	26%	4,735	40%
Before 1950	4,010	21%	1,945	16%
Total	19,135	100%	11,975	100%

Table 8 – Year Unit Built

Data Source:	2011-2015 ACS
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Data Source Comments:	
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Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	8,990	47%	6,680	56%

Housing Units build before 1980 with children present	2,680	14%	1,610	13%

Table 9 – Risk of Lead-Based Paint

Data Source:	2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)
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Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 10 - Vacant Units

Data Source:	2005-2009 CHAS
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Need for Owner and Rental Rehabilitation

There is a need for both owner and rental rehabilitation, especially in areas of the community with older housing stock. Per Table 38, nearly half of the City's owner-occupied housing stock and 55% of the renter-occupied housing stock was built prior to 1980. When looking at the original city center, the average age of the housing stock is well above 100 years. The City identified owner-occupied housing rehabilitation a priority need in the 2015-2019 Consolidated Plan. It will meet its goal of 100 single-family, owner-occupied housing rehabilitation projects completed indicating a definite need. Additionally, the City has received funding for two rounds of the Illinois Housing Development Authority's Single Family Rehabilitation program. The pre-application process for the most recent round of funding maxed out at 20 applicants within seven minutes of opening.

In addition to the rental rehabilitation needs identified in Table 37, data compiled from the citizen and stakeholder outreach process also support rehabilitation on rental units. Overall, 19% of Bloomington survey respondents indicated a difficulty finding safe, sanitary and affordable housing. However, 34% of renters indicated difficulties.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Per 2013-2017 ACS data, there are 34,112 housing units in Bloomington. Approximately 50% of the housing units in the City were built prior to 1980, and therefore, are more likely to contain lead-based paint. Residents in the 61701 zip code are more likely to be exposed to lead-based paint than any other area of the City. The housing stock in this area is the oldest in the City. ACS data indicates there are 16,169 (78.4%) of which were built prior to 1980. The 2019 McLean County Community Health Needs Assessment (CHNA) reports that residents of 61701 have the highest risk of lead exposure than any other zip code in McLean County.

Residents of 61701 are more likely to be low- or moderate-income than residents of other areas. Forty percent of 61701 residents live at or below the 185 poverty line compared to 25% of for the City as a whole. Nearly 2,500 children under age five live and play in the 61701 area.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction:

The Housing Authority of the City of Bloomington (also referred to as Bloomington Housing Authority or BHA) provides subsidized housing programs that offer safe, affordable rental housing to low-income families and individuals in the Bloomington-Normal area. As of the end of 2018, more than 2,800 individuals were housed through BHA's two main programs: public housing and the Section 8 Housing Choice Voucher program.

Totals Number of Units

	Program Type								
	Certificate	Mod-Re-hab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	14	637	430	0	430	0	0	0
# of accessible units									

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 11 – Total Number of Units by Program Type

	PIC (PIH Information Center)
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Describe the supply of public housing developments:

The Housing Authority has ten public housing developments that are grouped into four Asset Management Properties (referred to as "AMP's", which are used for various HUD program management purposes).

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

Each public housing site is listed in the table below with its age of construction in parentheses. Units are regularly inspected by Housing Authority staff, Housing Authority-contracted inspectors, and by HUD-contracted inspectors to ensure that all units are safe, decent, and compliant with HUD standards. Despite the advanced age of the buildings, the Housing Authority has consistently reinvested in the public housing sites. The "average inspection score" refers to scores resulting from HUD Real Estate Assessment Center (REAC) inspection process. The first number is an average of scores from inspections conducted since 2014; the second number is from the most recent inspection (April 2019).

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

Services in McLean County are well connected. Because of that, homeless facilities and service providers are better able to leverage mainstream resources through outreach and case management and connect clients to services that specifically assist those experiencing homelessness. In each individual case, staff determines for which services program participants qualify and want to engage. This is done in a non-coercive, non-judgmental, and culturally competent manner. All clients, whether working with a case manager or not, are able to dial 211 through PATH Crisis Call Center. The Call Center is a 24/7 information and referral call center that helps callers find resources based on their expressed needs.

The Continuum of Care (CoC) Program is a network of community stakeholders in an established geographic area that have the mission to reduce, alleviate, and end homelessness. CoC and ESG funded projects provide people experiencing homelessness with access to outreach, emergency shelter, transitional housing, permanent supportive housing, and rapid rehousing. A CoC Planner, Homeless Management Information System (HMIS) Lead, Continuum Executive Board, several sub-committees, and other stakeholders, help guide local policy related to homelessness, ensure effective understanding of HUD regulations and policy, and work toward improving system performance.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	56	0	0	6	0
Households with Only Adults	98	37	13	33	0
Chronically Homeless Households	0	0	0	6	0
Veterans	0	0	18	0	0
Unaccompanied Youth	23	0	17	0	0

Table 13 - Facilities and Housing Targeted to Homeless Households

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Bloomington-Normal contains a wide variety of facilities and services catered towards providing primary health services, mental health services, employment assistance, and basic needs resources (food, clothing, and shelter) to individuals experiencing homelessness.

The Community Health Care Clinic provides medical care, free-of-charge, to patients who lack health insurance. This allows people experiencing homelessness and no coverage to get healthcare immediately. Clients are then encouraged to apply for medical care (i.e., Medicaid, Medicare) and referred as appropriate. The McLean County Health Department provides Family Case Management, which assists pregnant women, infants 0-1 years old, and high risk infant follow-ups 0-2 years. Planned Parenthood offers healthcare services to those with and without insurance for issues related to pregnancy, birth control, abortion services, STD testing, and men's and women's healthcare. They also provide LGBTQ services.

People experiencing homelessness experience mental health problems at a higher rate than the general population. Therefore, when appropriate and in a non-coercive manner, clients are referred to agencies that can provide counseling, medication, and sometimes case management. The McLean County Center for Human Services, Chestnut Health Systems, Center for Youth and Family Solutions, and INtegrity Counseling are available to assist with outpatient services. Through the McLean County Center for Human Services there is a 24 hour crisis team that can provide quick, on-site counseling and evaluation to those in crisis situations. Those in crisis may also call 211 at PATH for immediate assistance. Mental health providers in the community are able to assess the need for psychiatric hospitalization. Advocate BroMenn Medical Center has a 17 bed inpatient unit that can provide assistance to those experiencing psychiatric emergencies and emotional trauma. Both local hospitals, Advocate BroMenn and OSF St. Joseph's, provide outpatient mental health care.

Obtaining employment and increasing income is a top priority. Clients can get assistance obtaining SSI, SSDI, TANF, or other temporary financial assistance programs through the Bloomington Township office. Case management is also available to help clients file for unemployment. Salvation Army's Employment Services Program helps clients work on resumes and connects them with local mainstream employment service programs such as temp agencies. A "felony-friendly" employment list has been generated to assist clients with a criminal background obtain work. Jobs Partnership/Joy Care Center assists clients with employment as well as spiritual needs. Sometimes financial assistance can be targeted (e.g., LIHEAP, SNAP, WIC) to help with particular expenses. These forms of financial assistance help stabilize clients by freeing other forms of income for rent and utilities.

Other mainstream resources are leveraged as well to assist clients with the following: obtain free mobile phones, connecting to disability services, interpretation services, case management and counseling services, food access, and housing

A variety of organizations offer employment services to the Bloomington-Normal community, including those experiencing homelessness. Those services are described in Section MA-45 Non-Housing Community Development Assets.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Any individual adult or family experiencing homelessness is able to get assistance from PATH. The Outreach team helps assess the situation, determine needs, and provides help with immediate shelter, employment, and long-term stability. Once someone is housed, Recycling Furniture for Families is able to provide free furniture.

PATH assists all individuals and families experiencing homelessness through the Coordinated Entry system. Referrals are made to all housing opportunities (e.g., rapid rehousing, permanent supportive housing) as well as to shelters and outreach teams.

The chronically homeless are primarily served by PATH when they are on the streets and by the Salvation Army's Safe Harbor when they obtain emergency shelter. In McLean County, there are five beds specifically reserved for the chronically homeless at Mayors Manor, a permanent supportive housing project. There are 26 total beds and they most of the residents were chronically homeless. There is one bed reserved for the chronically homeless at Chestnut's Project Hope, another permanent supportive housing project. Additionally, Chestnut's Supportive Housing and Samaritan Housing, address housing for the chronically homeless via scattered sites.

When families with dependent children become homeless, Home Sweet Home Ministries (HSHM) can provide immediate shelter. HSHM is a non-CoC/ESG funded shelter that is able to maintain its own rules and structure. As such, it is a sober facility and is generally more restrictive in its admission policies (e.g., criminal background that is violent in nature within the last 3 years can bar admission). The Crisis Nursery is able to provide support to families experiencing homelessness by sheltering children 6 and under. The structure of the program allows children to stay in a safe and nourishing environment but does not allow for the parents to stay. In cases of domestic violence, families are able to go to the Neville House. They are able to call the 24/7 hotline number and get screened for services that include shelter stay or non-residential services such as counseling and life skills training.

The Central Illinois CoC as a whole has effectively ended Veteran homelessness since March 12, 2019. Our current infrastructure and services available to Veterans experiencing homelessness is working. Once a Veteran has been identified, the CoC is able to house them and their family within 90 days. Veterans are able to get one-time financial assistance from PATH's We Are Building Lives program. Veterans can be placed in transitional housing through the Grant Per Diem programs at either Home Sweet Home Ministries or the Salvation Army. The Salvation Army also has a Supportive Services for Veteran Families (SSVF) program that can help house Veterans. The Veterans Assistance Commission (VAC) can provide temporary financial support. Veterans can also get employment help through the Illinois Department of Employment Security with their Disabled Veterans Outreach/Veterans Career Coach. A new VA clinic will open in Bloomington early in 2020, providing veterans in the area another option for medical care.

Unaccompanied Youth (18-24) are able to get assistance from PATH's Outreach team. However, Project Oz is the primary service provider that helps the youth homeless as young as 10 up to age 23. Oz operates 2 emergency shelter programs, as well as 3 transitional housing programs. Case management and life skills classes are offered to clients. One of the transitional housing programs offers services for those that are homeless youth at risk of sexual exploitation, while another transitional housing program targets pregnant and parenting females experiencing homelessness.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

Persons who have little or no income and no housing options available often turn to living on the street. Social service agencies work with persons experiencing homelessness to place them in permanent housing and provide support services to enable them to remain in the units. However, the homeless population is fluid. As individuals move beyond their homeless condition other individuals begin to experience homelessness. Service providers are shifting their philosophy from managing homelessness to ending homelessness through prevention for those at risk. This is achieved through a coordinated access process that includes assessment, permanent supportive housing, community supports, and rapid re-housing.

Bloomington-Normal contains a wide variety of facilities and services catered towards providing primary health services, mental health services, employment assistance, and basic needs resources (food, clothing, and shelter) to individuals experiencing homelessness. The majority of these services are located in Bloomington, where homelessness rates are higher, though they are accessible to residents of Normal as well. According to the 2018 McLean County Community Health Survey, 8% of survey respondents reported being homeless with an additional 7% indicating that they currently have housing but are worried about losing it. Providing Access to Help (PATH), as the lead entity for the Central Illinois Continuum of Care (CICoC), helps to connect individuals experiencing homelessness with assistance for emergency shelter, relocation, and re-housing opportunities.

In 2018 PATH reported that 29% of the clients added to the prioritization list by PATH's outreach team were placed into permanent housing locations, 35% of the clients located temporary housing solutions, and the other 36% were either institutionalized, relocated outside of the service area, or could not be located after three follow-up attempts.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

It can be difficult to identify the exact number of units needed for supportive housing, due to the dynamic nature of disabilities, addictions, or needs. Further, some individuals who would benefit from supportive housing live with family members, thereby making it difficult to capture the true need. There has been an identified need for supportive housing for adults on the autism spectrum, through a community/parent-led group building dialogue on the topic. Other populations and needs are largely anecdotal due to community conversation, though have been identified.

The Bloomington Housing Authority and MarcFirst have residential programs with supportive services that serve those with developmental disabilities and live alone. Approximately 80 spaces are available in supportive group settings and MarcFirst provides supportive services to an additional group of persons with less severe limitations who live in their own apartments.

While it was previously believed that the supply of overnight shelters to accommodate the needs for those experiencing homelessness was adequate, there is a known need for permanent, supportive housing (or permanent housing with separate supports) to help alleviate the problems of housing the chronically homeless population.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

State protocols for mental health do not include referrals to HUD funded programs. The State of Illinois has policies to assure patients are not discharged into homelessness unless they choose to not accept the institution's discharge plan. Community mental health agencies access half-way houses, boarding facilities, transitional housing funded through non-HUD sources, and Section 8 vouchers to serve the population coming from an institution. Health care facilities are charged with the responsibility to not release patients to the streets or HUD- funded beds. Social work departments within the hospital must initiate and implement discharge planning. Appropriate places to discharge to from the hospitals are nursing homes, rehabilitation centers, or stable homes.

Clients may be released to homeless shelters only when that patient was homeless prior to the hospital entry and the stay in the hospital was less than 30 days. The Continuum of Care (CoC) maintains regular contact with the local hospital and institution staff to assure that disruptions from staff turnover are minimized. In addition, health care administrators and social workers take part in CoC meetings and agency brochures and housing information are sent to hospitals on a regular basis

Mainstream Housing Vouchers may be accessible to persons returning from mental and physical health institutions, allowing them access to supportive housing. The Bloomington Housing Authority (BHA) was the recipient of 13 mainstream housing vouchers, which have eligibility requirements that can include coordinated outreach and referral of persons with disabilities in institutional and other segregated settings who want or need to move to community settings. BHA partners with community organizations experienced in serving people with disabilities, those at serious risk of institutionalization, homelessness, or at risk of becoming homeless.

YWCA - Labyrinth provides outreach services to women who are transitioning out of jail or prison or who are on parole or probation. They provide assistance in many areas such as transportation, housing, counseling, case management, and education. Labyrinth has a mentoring program, employment services, a transitional living program, and outreach case management and counseling.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

In 2019, the City was awarded \$100,000 from the Illinois Housing Development Authority (IHDA) through its Home Accessibility Program (HAP). HAP is designed to address the housing rehabilitation needs of the elderly and residents living with a disability. Unlike IHDA's other programs, HAP is available not only to income qualified homeowners but also landlords who rent to income qualified residents. Funding is limited to \$25,000 per household through a 5-year forgivable mortgage. CDBG funds will be leveraged on projects requiring more than \$25,000 in assistance. The City intends to apply for future rounds of funding as it supports Preservation of Existing Affordable Housing Stock goal.

The City will also continue to partner with the local American Business Club (AMBUCS) to construct accessibility ramps for elderly and disabled residents. Through this partnership, the City uses CDBG funding to purchase building materials and AMBUCS utilizes volunteers to complete construction at no cost to the homeowner. Annually, this partnership results in approximately five new ramps for low- and moderate-income households. Public facility and infrastructure projects that address accessibility issues will be prioritized above other requests. Non-housing accessibility improvements will support the goal to Provide Quality City Services and Public Facilities for All Residents.

Behavioral health was identified as a high need frequently throughout the citizen and stakeholder engagement process. Although the City recognizes the vast need for services for those with behavioral health issues, it has not prioritized it as a high need in this plan due to the amount of non-CDBG funding available in the community for behavioral health services. McLean County issued a tax levy several years ago to create a sustainable revenue stream for behavioral health services. Also, the City serves as Trustee for the John M. Scott Health Trust, which granted more than \$450,000 in funds to local not-for-profit organizations in 2019. Many of the agencies funded requested support for behavioral health programming.

MA-40 Barriers to Affordable Housing – 91.210(e)

Describe any negative effects of public policies on affordable housing and residential investment.

Increased regulatory costs and taxes are frequently cited by both developers and residents as a barrier to developing or obtaining decent, safe and affordable housing.

Additionally, the cost of retrofitting homes to improve accessibility for people with mobility limitations is often prohibitive and building accessibility features into new homes is an added cost for developers.

Affordable housing development in Illinois is strongly driven by the Illinois Housing Development Authority (IHDA)'s Opportunity Area designations, which provide incentives for affordable housing development in areas that meet certain criteria. In McLean County, some of these areas lack adequate access to transit and amenities, making affordable housing development more challenging.

There is also a shortage of landlords that are willing to rent to people with poor credit, unfavorable rent history, or criminal background. Additionally, it is difficult for people with housing choice vouchers to find landlords willing to rent to them. Comments received through the Citizen Survey reflect these challenges:

“Some landlords won’t rent to you if you say you have a housing voucher.”

“Unwillingness to rent to people with subsidized housing”

“They won’t rent to people with backgrounds.”

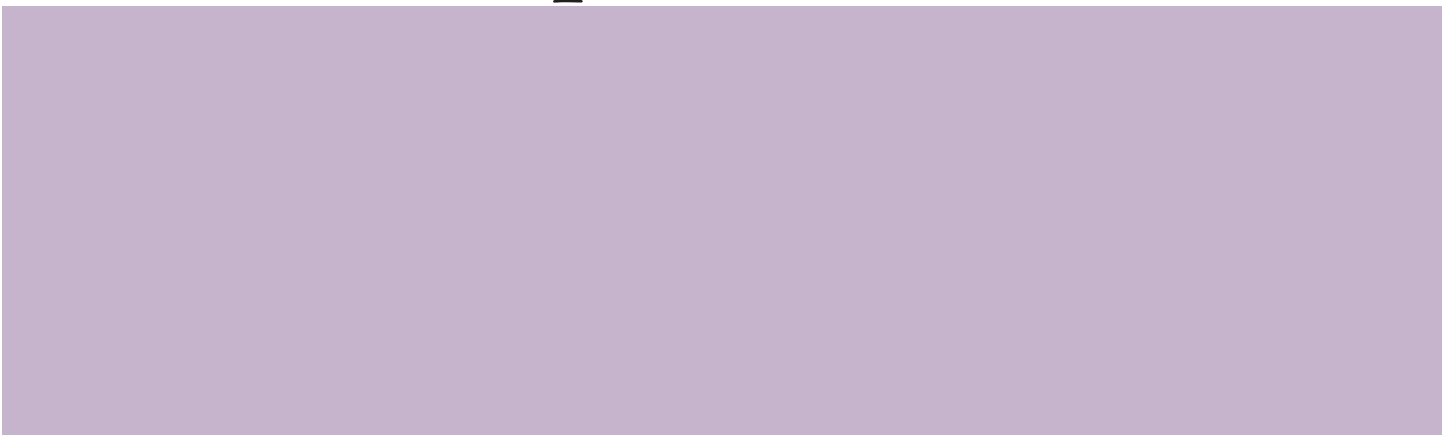
“Some students are not able to sign leases based on their credit score.”

Bloomington Normal Water Reclamation District (BNWRD) recently announced that they will need to spend more than \$160 million over the next couple of decades in order to make improvements required by the federal government. User fees, which currently range from \$12-\$15 per month, will go up in a series of small increases over five or 6 years. Increases in fees such as these disproportionately affect lower income homeowners as well as renters, who generally have these increases passed onto them by property owners. Building codes, fees and charges for other basic services such as waste removal or recycling, may also create financial barriers which preclude low or moderate income residents from obtaining or keeping affordable housing.

While not directly attributed to any specific public policy, one of the most prevalent barriers to affordable housing and residential investment in McLean County is low average market values in certain areas of the community. Many existing homes in these areas are not in great condition and require significant investment in order to make them livable. Due to low market values, however, the investment required to purchase and improve the property is much higher than what the property will be worth after improvements. Market conditions such as this deter potential homeowners from purchasing in these areas, as well as deter property owners from making improvements to properties.



Non-Housing Community Development Assets



MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

In 2015, a wide variety of public and private stakeholders, including area businesses, economic development organizations, and local governments, came together to develop the BN Advantage economic development strategy.

The strategy utilized a comprehensive analysis of the Bloomington-Normal economy based on key factors that are utilized to assess a community's competitiveness and capacity for economic growth. The strategy touts Bloomington-Normal's continued economic stability and prosperity as home to State Farm and COUNTRY Financial's headquarters, a robust agricultural base, four institutions of higher education, two health care systems and many other successful businesses and nonprofits. Residents of Bloomington-Normal are well educated, which is reflected in the area's higher than average median incomes.

While the Bloomington-Normal area emerged from the Great Recession relatively unscathed and is well positioned to continue to capitalize on a strong and growing economy, recent major corporate reorganizations and lagging wage growth present challenges to the community.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	139	59	0	0	0
Arts, Entertainment, Accommodations	4,167	6,642	13	13	0
Construction	1,002	1,514	3	3	0
Education and Health Care Services	4,763	6,205	15	12	-3
Finance, Insurance, and Real Estate	9,600	21,769	31	43	12
Information	467	473	2	1	-1
Manufacturing	1,873	1,704	6	3	-3
Other Services	1,222	1,964	4	4	0
Professional, Scientific, Management Services	2,219	3,343	7	7	0
Public Administration	0	0	0	0	0
Retail Trade	3,583	5,072	12	10	-2
Transportation and Warehousing	904	988	3	2	-1
Wholesale Trade	1,093	846	4	2	-2
Total	31,032	50,579	--	--	--

Table 14 - Business Activity

	2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)
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Labor Force

Total Population in the Civilian Labor Force	43,390
Civilian Employed Population 16 years and over	40,660
Unemployment Rate	6.27
Unemployment Rate for Ages 16-24	26.70
Unemployment Rate for Ages 25-65	3.64

Table 15 - Labor Force

Data Source:	2011-2015 ACS
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Occupations by Sector	Number of PeopleMedian Income
Management, business and financial	13,280
Farming, fisheries and forestry occupations	1,865
Service	3,670
Sales and office	9,885
Construction, extraction, maintenance and repair	2,005
Production, transportation and material moving	1,655

Table 16 - Occupations by Sector

Data Source:	2011-2015 ACS
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Data Source Comments:	
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Travel Time

Travel Time	Number	Percentage
< 30 Minutes	34,425	88%
30-59 Minutes	3,460	9%
60 or More Minutes	1,190	3%
Total	39,075	100%

Table 17 - Travel Time

Data Source:	2011-2015 ACS
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Data Source Comments:	
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Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	815	155	650
High school graduate (includes equivalency)	6,420	590	2,225
Some college or Associate's degree	8,200	450	1,630
Bachelor's degree or higher	18,025	340	2,425

Table 18 - Educational Attainment by Employment Status

Data	2011-2015 ACS
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Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	30	60	190	260	375
9th to 12th grade, no diploma	780	340	225	545	520
High school graduate, GED, or alternative	1,805	2,455	2,455	4,330	3,020
Some college, no degree	4,335	2,175	1,495	3,595	1,635
Associate's degree	515	1,010	700	1,320	210
Bachelor's degree	1,255	4,455	3,590	6,105	1,525
Graduate or professional degree	180	1,735	1,970	2,930	1,270

Table 19 - Educational Attainment by Age

Data	2011-2015 ACS
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Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	20,518
High school graduate (includes equivalency)	25,322
Some college or Associate's degree	32,287
Bachelor's degree	57,799
Graduate or professional degree	71,725

Table 20 – Median Earnings in the Past 12 Months

Data Source:	2011-2015 ACS
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Data Source Comments:	
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Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Based on the information above, the major employment sectors in Bloomington-Normal are Finance, Insurance, and Real Estate, and Education and Health Care Services. The 2017 regional housing study, BN Home, identifies Business and Financial Services and Education and Knowledge Creation as the two significant industrial clusters in Bloomington-Normal. The study also identified Business and Financial Services, Education and Knowledge Creation, Information Technology, Agribusiness, and Logistics and Warehousing as key strategic industries for McLean County. Two of the concentrated sectors of Business and Financial Services and Education Knowledge Creation provide higher-than-average income levels when compared to other clusters. The 2015 BN Advantage report identified Information and Communication Technologies, Advanced Business Services, Agri-Business, Transportation and Logistics, and Entrepreneurship as target industries. In addition, it identified Education Institutions and Medical Institutions as two key pillars. According to BN Advantage, "Bloomington-Normal is best suited for office users and logistics operations, as well as value added agriculture and food processing. The region offers an attractive environment for headquarters, shared services, finance and insurance and transportation/distribution services that are compatible with the types of sites and buildings that are available, as well as a match with the local workforce."

Describe the workforce and infrastructure needs of the business community:

Finding the right kinds of skilled workers is the number one factor for virtually every type of business. One of the biggest workforce issues in McLean County is the ability to retain educated college graduates. Once they receive their degree, many take their skill sets to larger urban areas. As part of the BN Advantage program, the McLean County Chamber of Commerce spearheaded a new initiative in 2019 to address this issue. Becoming BN was specifically designed for summer interns in McLean County to learn more about the attributes Bloomington-Normal has to offer in hopes that they would build connections and stay in the area after graduation. The program will continue in 2020.

The Chamber, also as part of the BN Advantage program administered a survey between December 10, 2016 and March 8, 2017 to assess the needs of employers in McLean County. Key findings from the survey include:

- Many of the current jobs with substantial volume do not require advanced degrees;
- Positions evaluated as most difficult to fill generally require more education;
- Customer Service, Billing and Collections, Nursing, Nursing Assistants, Production Workers, and Sales project the most growth;
- Employers believe people leave due to financial opportunity and personal reasons vs. quality of place/climate/geography; and
- Employers validated the importance of the Essential Skills model and identified several key priority areas of focus (communication, teamwork and critical thinking).

The industries that the Bloomington-Normal region has traditionally relied on are changing as technologies evolve and globalization intensifies. These dynamics are changing the way in which employers and entrepreneurs are making decisions as to where to invest their capital, innovate new services and products, locate new facilities, and create new jobs. In order to continue to grow and deliver the type of environment that businesses and employees seek, Bloomington-Normal must invest not only in traditional infrastructure, but also quality of life improvements.

While the Citizen Survey did not directly target businesses, traditional infrastructure improvements ranked as a high need across all demographic categories. Street/Sidewalk Improvements and Water/Sewer Improvements ranked within the top 3 for all categories of respondents in Bloomington and Normal.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

One of the biggest changes to Bloomington-Normal's economy in recent years was the closing of the Mitsubishi plant in 2015. Mitsubishi phased out employment from a peak of employment of around 4,000 employees in the early part of the 2000-2010 decade, down to less than 1,000 employees by November 2015 when it closed. In early 2017, however, the electric car startup Rivian purchased the plant and is on track to invest at least \$40 million overhauling the plant and will employ as many as 1,000. Rivian's first vehicles are expected to hit the market in 2020. This investment will create a need for manufacturing employees, which will in part be filled by former Mitsubishi workers.

Brandt Group purchased the former Kongsilde Industries plant just north of Normal in 2017 and work continues on a planned \$35 million expansion. The plant produces agricultural equipment for the U.S. corn and soybean markets and expects to employ over 300 people when the plant hits full capacity.

A major reorganization of State Farm in 2017-2018 led to hundreds of job cuts, relocations and retirements locally. Other positions have been moved in, but it is unclear what those workers earn compared with previous local employees. Increases in lower paying jobs could increase the need for housing options at lower price points.

State Farm also vacated their original headquarters in downtown Bloomington in early 2018, leaving an empty 13-story, 200,000-square-foot building in the heart of the City. When the initial sale of the building fell through, State Farm proposed to demolish the property. However, the company recently announced that they have finalized the sale of the building to a Rockford-based developer that plans to build 200-plus upscale apartments at the site. It is unclear at this time what type of assistance will be needed for this project.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

In general, Bloomington-Normal has a highly productive and educated workforce that can meet the talent needs of a broad range of business and industry.

Respondents to the aforementioned Employer Needs Survey cited relative difficulty in recruiting Sales Representatives, General and Operations Managers, First-Line Supervisors of Production and Operating Workers, Lawyers, and Market Research Analysts. Other gaps identified included difficulty hiring for skilled trades and soft skills such as, basic customer service skills, personal time management, reliability, and ability to accept feedback.

Job Training and Apprenticeships/Internships came up frequently as a need in both the Citizen and Stakeholder Surveys, as well as public meetings and focus groups held in preparation for this Plan. Comments received throughout this process include:

"Expand offering of job skills training and trades, increase partnerships between the community college and local employers."

"High schools and Heartland Community College should offer more education and job training for semi-skilled and skilled jobs where the demand exceeds the number of people available to fill the jobs."

"Job training, soft skill development on completing applications/resumes and interviewing skills."

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

McLean County COMPACT, through the McLean County Chamber of Commerce, is a collaborative network of stakeholders who work to ensure that Bloomington-Normal's existing and future employers are able to cultivate, retain, and attract the talent that they need. COMPACT hosts a variety of workforce development programs aimed at forming alliances and facilitating community efforts to improve college and career readiness.

Heartland Community College in Normal offers multiple career training and "work ready" programs including truck driver

training, phlebotomy, veterinary assistant, dental assistant and pharmacy technician. Continuing education, online career training and youth evening care are also offered by Heartland. Youth Evening Care provides supervision, activities and homework help for children ages 5 (and in kindergarten) - 13 while their parents are attending evening classes.

MarcFirst, a non-profit dedicated to helping those with disabilities in the Bloomington-Normal area, offers a Supported Employment Program (SEP). SEP provides support for individuals living in McLean County with intellectual and developmental disabilities with obtaining and maintaining community employment.

The Goodwill Career Development Center in Normal provides services free of charge to all those who are seeking employment in Bloomington/Normal and the surrounding communities. Services include online job searching, basic computer training, assistance with resumes and cover letters, and outreach activities such as career and resource fairs.

YouthBuild McLean County provides educational and occupational skills training for the youth of McLean County. The organization operates three, year-round educational programs that work to elevate the skills of participants to post-secondary education and workforce readiness.

Bloomington Housing Authority employs a full-time Service Coordinator to connect residents with the right resources that will lead them to self-sufficiency. This program provides referrals, based on a family's needs, to local partners that provide services such as career and educational development programs.

Mid Central Community Action Agency provides financial coaching, home-ownership counseling and educational opportunity via its Next step program.

Career Link is a non-profit organization serving McLean and surrounding counties that administers the Workforce Innovation and Opportunity Act, a federal job training program. Career Link provides no cost services to employers including apprenticeship wage assistance, career transition services for laid off workers, incumbent worker training, and on-the-job training assistance.

Project Oz offers life skill classes for budgeting, finding housing, job preparation, nutrition, self-care, safety information, and networking with other youth with similar experiences. Project Oz offers assistance with obtaining employment through its housing program for homeless individuals aged 17-22.

The Salvation Army provides professional development services for chronically jobless individuals. Salvation Army assesses individuals to identify areas of strength and abilities best suited for desired work. They help individuals overcome qualification barriers through pursuit and completion of educational requirements, training, certifications, and other prerequisites for gainful employment.

Jobs Partnership - Joy Care provides a 12-week classroom course for the unemployed and underemployed designed to promote personal growth and professional success. The course objectives are to understand a Biblical perspective of work and to use practical work principles to develop a positive attitude and good work habits.

YWCA Labyrinth addresses the needs of women exiting incarceration. Labyrinth provides support and guidance for clients to obtain the resources needed to aid them on their new journey, including education and employment skills. Labyrinth provides transitional housing for a limited number of clients.

Each of these programs will have a role in addressing workforce/job training needs.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

No

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

BN Advantage is a strategic plan which describes the mission, goals and strategy for Economic Development in McLean County. This plan came together as a partnership between six county-wide organizations: Bloomington-Normal Economic Development Council, McLean County Chamber of Commerce, McLean County Regional Planning Commission, Bloomington-Normal Area Convention and Visitors Bureau, Bloomington-Normal Airport Authority, and Connect Transit. This plan is neither created with the support of the EDA, nor is the plan submitted to EDA to be certified as a CEDS. However, this strategic plan serves all of the same functions an "official" CEDS would serve.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of “concentration”)

When discussing housing problems, an area of concentration refers to a geographic area in which a large amount of housing issues are concentrated. The area identified in 2008 by the City as West Bloomington is geographically identified as south of Locust Street, North of Taylor Street, West of Lee Street, and East of Morris Avenue.

The West Bloomington area is considered to have a concentration of multiple housing issues. West Bloomington is part of the 61701 zip code which, according to the 2019 joint Community Health Needs Assessment (CHNA), has been identified as high risk for healthy housing issues such as high levels of lead (highest in McLean County) and a strong prevalence of asthma. Additionally, the 2019 joint CHNA has listed the 61701 area as the zip code with the greatest social disparities in the County, a low-income census tract, and has identified a portion of the West Bloomington community as a food desert.

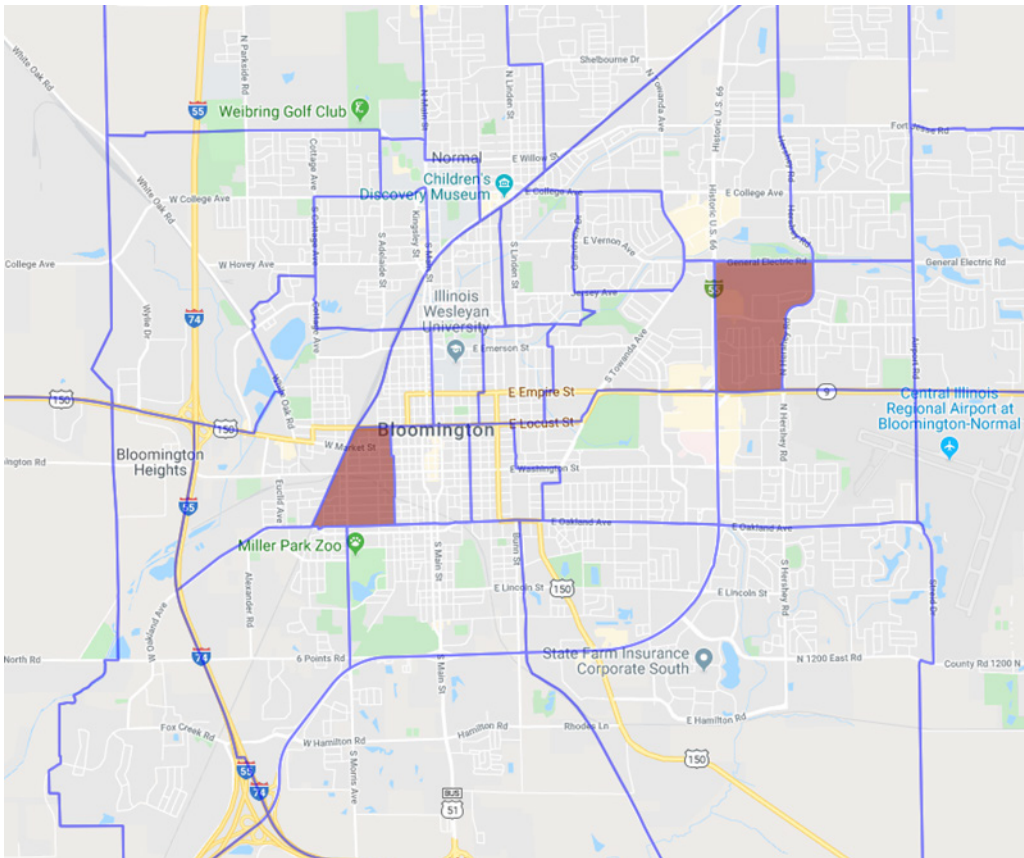
Finally, although the West Bloomington neighborhood has established plans in place to reduce slum and blight, this still remains an issue. Since 2008 the City’s adopted definition of a “slum and blighted area” has referred to a predominantly urbanized area within the territorial limits of a municipality in which 25%, or more of the properties exhibit one or more of the following characteristics:

1. Prevalence of buildings in which it is unsafe or unhealthy for persons to live or work. The existence of inadequate public improvements; such as: water, sewer, street, curb and gutter, sidewalks, and parking areas.
2. Existence of properties with known or suspected environmental contamination or hazardous wastes.
3. The existence of factors that prevent or substantially hinder the economically viable use or capacity of buildings or lots.
4. Adjacent or nearby uses that are incompatible with each other and which prevent the economic development of those parcels or other portions of the project area.
5. The existence of subdivided lots of irregular form and shape and inadequate size for proper usefulness and development that are in multiple ownership and/or do not meet the City’s bulk regulation standards as adopted by the zoning code.
6. Depreciated or stagnant property values, impaired investments, or increase in foreclosures.
7. Abnormally high business vacancies, abnormally low lease rates, high turnover rates, abandoned buildings, or excessive vacant lots within an area developed for urban use and served by utilities.
8. A lack of necessary commercial facilities that are normally found in neighborhoods, including grocery stores, drug stores, banks, and other lending institutions.
9. Residential overcrowding or an excess of bars, liquor stores, or other businesses that cater exclusively to adults, which has led to problems with safety and welfare.
10. A high crime rate that constitutes a serious threat to the public safety and welfare.

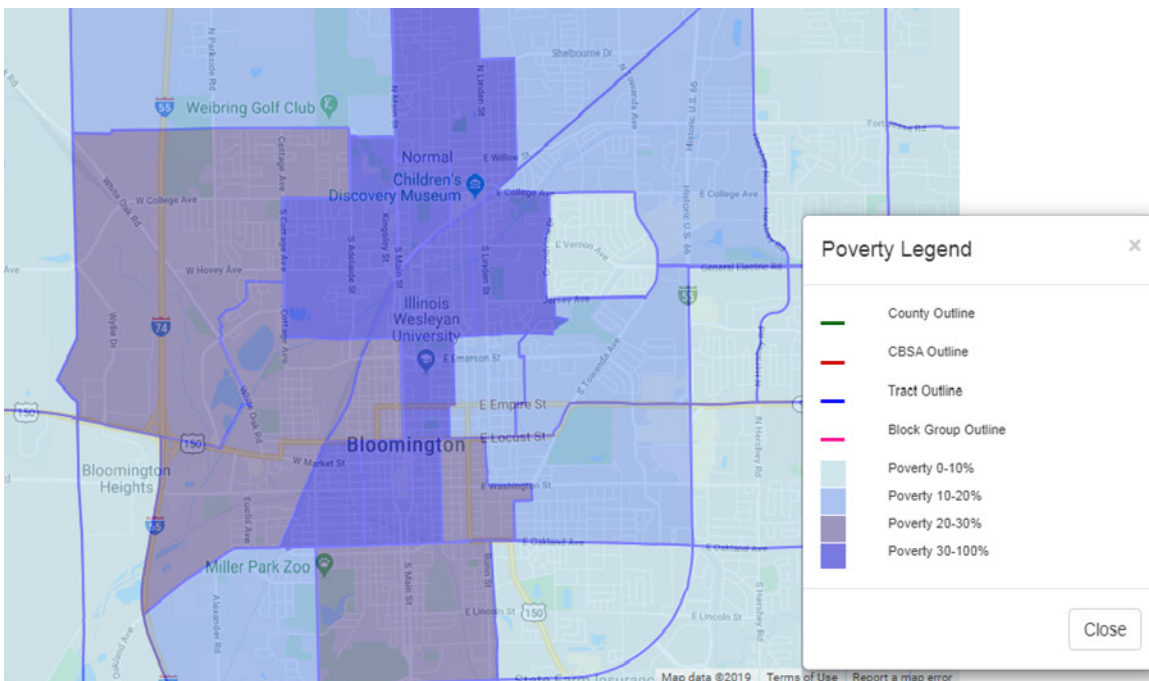
Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of “concentration”)

HUD’s 3rd Definition of Minority Concentration defines such an area as; any area where the percentage of a particular minority is at least 20% higher than the citywide percentage.

As demonstrated in the map on the next page, HUD’s Rental Assistance Demonstration (RAD) has identified two areas as having a minority concentration through their Minority Concentration Analysis Tool within the City of Bloomington.



However, the area identified as a minority concentration that is located west of Downtown (61701) has also been identified as a low-income area, whereas the area to the east (61704) has not been identified as low income. Location of low income areas is demonstrated in the map below.





Strategic Plan



Strategic Plan

SP-05 Overview

Strategic Plan Overview

This document represents the overall planned use of the City of Bloomington's Community Development Block Grant (CDBG) funds for the period covering May 1, 2020 - April 30, 2025. CDBG funds will be used to address housing and community development needs within the City's corporate limits, especially those areas identified by HUD as low- and moderate-income areas.

The City joined forces with the Town of Normal and McLean County Regional Planning Commission to undertake a strong citizen engagement process in the creation of this plan. Data collected from citizens and stakeholders was analyzed in depth and utilized along with other data sources to create the 2020-2024 Strategic Plan.

1	Area Name:	LMA Regeneration Area - Outside WBRP
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	The Regeneration Area, as defined by the City's 2015 Comprehensive Plan, is located on the west side of Bloomington bounded by Downtown and Main St. along the east, 1-55/1-74 on the west, and Miller Park on the south.
	Include specific housing and commercial characteristics of this target area.	Bloomington's housing stock is comprised of 2/3 owner-occupied units and 1/3 rental units. The housing stock in the Regeneration area is reversed at 2/3 rental and 1/3 owner-occupied. As would be expected, the rental vacancy rates are higher in the Regeneration Area compared to the rest of the City. Many rental unit owners do not live in the same neighborhood as their rental property, some don't even reside in Illinois. As a result, many rental properties suffer from lack of improvements. This area is home to the majority of the City's vacant/ abandoned properties. Lots sizes are smaller than other areas with lots ranging from 30'x120' to 150'x100'. The larger lots are typically found towards the western edge of the area.

	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Analysis of the Citizen Survey conducted in preparation for development of this plan identified West Bloomington as an area in need of revitalization resources by respondents from both Bloomington and Normal. The City's Comprehensive Plan identifies West Bloomington as a Regeneration Area in need of immediate resources. Also, the majority of the City's low and moderate income tracts are located in this area. The 2019 McLean County Community Health Needs Assessment indicates that residents of this area are more likely to have poor health outcomes than any other area of the City.
	Identify the needs in this target area.	Food insecurity is certainly a concern for residents as this area is a USDA designated food desert. Housing rehabilitation is a priority for both single- and multi-family units. The City has invested in infrastructure improvements in recent years but many more are needed. Many housing units have yet to connect to the City sewer system. Due to the older housing stock, residents of this area have a higher risk of lead exposure from both paint and water sources. The 2019 McLean County Community Health Needs Assessment identified this area as one of the top areas in the county with a disproportionate number of health issues.

How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Analysis of the Citizen Survey conducted in preparation for development of this plan identified West Bloomington as an area in need of revitalization resources by respondents from both Bloomington and Normal. The City's Comprehensive Plan identifies West Bloomington as a Regeneration Area in need of immediate resources. Also, the majority of the City's low and moderate income tracts are located in this area. The 2019 McLean County Community Health Needs Assessment indicates that residents of this area are more likely to have poor health outcomes than any other area of the City.
Identify the needs in this target area.	Food insecurity is certainly a concern for residents as this area is a USDA designated food desert. Housing rehabilitation is a priority for both single- and multi-family units. The City has invested in infrastructure improvements in recent years but many more are needed. Many housing units have yet to connect to the City sewer system. Due to the older housing stock, residents of this area have a higher risk of lead exposure from both paint and water sources. The 2019 McLean County Community Health Needs Assessment identified this area as one of the top areas in the county with a disproportionate number of health issues.

What are the opportunities for improvement in this target area?	A good majority of the social service agencies serving the City's low and moderate income residents are housed in this area. The City's established partnerships with organizations such as Mid Central Community Action, Habitat for Humanity, West Bloomington Revitalization Project, and Illinois Wesleyan University's Action Research Center provide the opportunity for stabilization and revitalization of this area. Currently, the City has funding through the Illinois Housing Development Authority for housing rehabilitation. The City has chosen this area as its primary target area and will continue to do so for future funding requests. The City is in the early stages of developing a more comprehensive approach to housing with a stronger focus on healthy housing. Beyond work completed through this Plan, the City will likely seek funding through HUD's Lead Hazard Control Program to support housing initiatives in this area.
Are there barriers to improvement in this target area?	The higher number of rental units presents a barrier to revitalization of this area. Most of the owners of multi-family units do not live in the same neighborhood as the rental property, some residing out-of-state. It is not uncommon for these and owners maintain rentals to the minimum standards, if at all. At this time, the City does not utilize CDBG funding for rental property rehabilitation outside of those owned by local not-for-profit housing providers. Although CDBG may not be a viable resource for rental rehabilitation, City staff will continue to seek other funding opportunities to support a rental housing rehabilitation program.
Area Name:	WBRP Service Area
Area Type:	Local Target area
Other Target Area Description:	
HUD Approval Date:	
% of Low/ Mod:	
Revital Type:	Comprehensive
Other Revital Description:	

What are the opportunities for improvement in this target area?	A good majority of the social service agencies serving the City's low and moderate income residents are housed in this area. The City's established partnerships with organizations such as Mid Central Community Action, Habitat for Humanity, West Bloomington Revitalization Project, and Illinois Wesleyan University's Action Research Center provide the opportunity for stabilization and revitalization of this area. Currently, the City has funding through the Illinois Housing Development Authority for housing rehabilitation. The City has chosen this area as its primary target area and will continue to do so for future funding requests. The City is in the early stages of developing a more comprehensive approach to housing with a stronger focus on healthy housing. Beyond work completed through this Plan, the City will likely seek funding through HUD's Lead Hazard Control Program to support housing initiatives in this area.
Are there barriers to improvement in this target area?	The higher number of rental units presents a barrier to revitalization of this area. Most of the owners of multi-family units do not live in the same neighborhood as the rental property, some residing out-of-state. It is not uncommon for these and owners maintain rentals to the minimum standards, if at all. At this time, the City does not utilize CDBG funding for rental property rehabilitation outside of those owned by local not-for-profit housing providers. Although CDBG may not be a viable resource for rental rehabilitation, City staff will continue to seek other funding opportunities to support a rental housing rehabilitation program.
Area Name:	WBRP Service Area
Area Type:	Local Target area
Other Target Area Description:	
HUD Approval Date:	
% of Low/ Mod:	
Revital Type:	Comprehensive
Other Revital Description:	

Identify the neighborhood boundaries for this target area.	The WBRP service area is located within the area identified as a Regeneration Area in the City's 2015 Comprehensive Plan. In 2016, the WBRP service area expanded to the north and west. The service area is bounded by Locust St. on the north, Roosevelt St. on the east, Oakland Ave on the south and Euclid St. on the west.
Include specific housing and commercial characteristics of this target area.	This area is often referred to as the City Center, as it was where Bloomington began. The housing stock in this area is among the oldest in the City with the average age well over 100 years. Housing units in Bloomington as a whole are about 2/3 owner-occupied and 1/3 rental. This area is comprised of 2/3 rental units and 1/3 owner-occupied. Many of the rental units are single-family units converted to multi-family. A significant number of lots in this area are considered non-conforming based on today's standards. With the smaller lot size, there is little room for accessory structures, so most parking is on-street. The area is primarily residential with the majority of the commercial properties located along the Market St. corridor.

How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Analysis of the Citizen Survey conducted in preparation for development of this Plan identified West Bloomington as an area in need of revitalization resources. This was the case not only with Bloomington respondents but also those from Normal. The City's Comprehensive Plan identifies WBRP as a key partner in the revitalization of West Bloomington. WBRP is currently updating its strategic plan with the goal of working with the City and McLean County Regional Planning Commission to eventually create a Neighborhood Plan.
Identify the needs in this target area.	The needs of this area are not unlike those of the Regeneration Areas as a whole. Food insecurity is certainly a concern for residents as this area is a USDA designated food desert. Housing rehabilitation is a priority for both single- and multi-family units. The City has invested in infrastructure improvements in recent years but many more are needed. Many housing units have yet to connect to the City sewer system. Due to the older housing stock, residents of this area have a higher risk of lead exposure from both paint and water sources. The 2019 McLean County Community Health Needs Assessment identified this area as one of the top areas in the county with a disproportionate number of health issues.
What are the opportunities for improvement in this target area?	WBRP recently received funding from the John M. Scott Health Trust to implement a pilot project designed to increase food security for residents. The program goal is to improve access to fresh food in one of two ways: grocery delivery service or CSA membership. The City is currently participating in the National League of Cities' Healthy Housing Forum. Through its participation in this 18-month initiative, the City will take a deeper dive into the housing issues affecting the health of residents in this area. The City intends to apply for funding through HUD's Office of Lead Hazard Controls and Healthy Homes to support its efforts to improve the quality of housing in this area. The City's housing rehabilitation programs, funded through CDBG and the Illinois Housing Development Authority, provide opportunities to complete housing rehabilitation at single-family residences under affordable terms. Most of the housing rehabilitation projects completed during the 2015-2019 Consolidated Plan occurred in this area. There is certainly an opportunity to continue efforts throughout the 2020-2024 Consolidated Plan.
Are there barriers to improvement in this target area?	The higher number of rental units presents a barrier to revitalizing this area. Most of the owners of multi-family units do not live in the same neighborhood as the rental property, some residing out-of-state. It is not uncommon for these owners to maintain rentals to the minimum standards, if at all. At this time, the City does not utilize CDBG funding for rental property rehabilitation outside of those owned by local not-for-profit housing providers. Although CDBG may not be a viable resource for rental rehabilitation, City staff will continue to seek other funding opportunities to support a rental housing rehabilitation program.
Area Name:	LMA Preservation Area
Area Type:	Local Target area
Other Target Area Description:	

HUD Approval Date:	
% of Low/ Mod:	
Revital Type:	Comprehensive
Other Revital Description:	
Identify the neighborhood boundaries for this target area.	The City's 2015 Comprehensive Plan identifies the boundaries of the Preservation area as "The old east side of Bloomington bounded by the Downtown and Main Street along the west and Veterans Parkway on the east and south".
Include specific housing and commercial characteristics of this target area.	Block size in this area varies with lots closer to downtown being smaller than those to the east. Homes in the area were built around the 19th and early 20th centuries and were originally occupied by the City's elite. The average square footage for homes is larger than the Regeneration Area at approximately 1450 sq. ft. Home values in this area can range from \$20,000 to \$450,000. There are many locally and nationally designated historic districts in the Preservation Area. Dominant architectural styles of homes in this area include Queen Anne, Italianate, Colonial, Tudor, Mission and Spanish Revival. The home ownership rates in this area are much lower than the City as a whole. The Dimmitt's Grove Neighborhood Plan indicates 40% of rental properties are owned by landlords that live outside of the neighborhood. The rental housing stock is made up of properties with 2-3 units, many of which have been converted from larger single-family homes. There is a shortage of off-street parking due to increased density over time. There is more commercial development in this area than the Regeneration Area, especially on the eastern edge towards Veterans Parkway.
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	The City's low and moderate income census tracts not located in the Regeneration Area are located in the Preservation Area. Downtown Bloomington and the outskirts of Downtown Bloomington were both ranked in the top five answers to the Citizen Survey question "Are there specific neighborhoods or areas within your community that should be targeted for revitalization or blight removal?" for residents with a household income under \$100,000.

Identify the needs in this target area.	Infrastructure in this area is aging and in need of replacement. The area is very walkable to Downtown, Bloomington Public Library, parks and neighborhood schools but the condition of sidewalks in some areas makes it difficult to safely get there. Many homes are not connected to the City sewer system. As with the Regeneration Area, there is a higher percentage of rental units with absentee landlords in this area. This area lies within the 61701 zip code. The 2019 McLean County Needs Assessment indicates that residents of 61701 suffer from poor health at a much higher rate than another other area in the City.
What are the opportunities for improvement in this target area?	Dimmitt's Grove has a strong neighborhood association and has adopted a neighborhood plan. There are opportunities to work with other neighborhoods in this area to create similar plans. Although this area has a fair number of registered historic properties, there are more that could be registered. The City's Planning Division offers a grant program to home and business owners of historic properties. The grant is designed to assist with rehabilitation costs. The Planning Division is in the process of updating its Historic Preservation Plan.
Are there barriers to improvement in this target area?	The home ownership rates in this area are much lower than the City as a whole. The Dimmitt's Grove Neighborhood Plan indicates 40% of rental properties are owned by landlords that live outside of the neighborhood. The rental housing stock is made up of properties with 2-3 units, many of which have been converted from larger single-family homes. This creates a shortage of off-street parking and the appearance of congestion. The area is considered mixed income which is evidenced by home values ranging from \$20,000 to \$450,000. This makes it a bit more difficult to promote specific programs to targeted areas. The City's Comprehensive Plan indicates that some homeowners and neighborhoods are resistant to apply for historic property and/or historic neighborhood designation due to a lack of understanding of the requirements. The cost of rehabilitation when preserving historic characteristics can be somewhat costly as well. The City's grant program can help offset the costs but only to a certain limit.

General Allocation Priorities *Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)*

The City of Bloomington's 2015 Comprehensive Plan identifies Bloomington's West Side as the Regeneration Area and calls for a "comprehensive and collaborative approach" to revitalization. Additionally, for Bloomington Citizen Survey respondents, "West Bloomington" was overwhelmingly listed as the top response to the question "Are there specific neighborhoods or areas within your community that should be targeted for revitalization and blight removal?". Interestingly, it was the 2nd most common response for Normal residents with a household income under \$60,000 and the top response for Normal residents with an income \$60,000 - 99,999. For these reasons, the City has identified West Bloomington as its primary target area. The WBRP Service Area is a smaller target area located within the Regeneration Area.

Any project that does not occur in the Regeneration Area will likely occur in the Preservation Area, immediately to the east of downtown. This area has experienced more private investment than the Regeneration Area in recent years but has several concentrated areas that require revitalization efforts. Historic preservation will be a key to maintaining stability in this area. The City offers two grant programs for historic preservation, one for homeowners and another for business owners in the downtown area. A significant portion of these target areas are located within the 61701 zip code. A map of the Comprehensive Plan's Neighborhood Classification Boundaries can be found in the Appendix.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 2 – Priority Needs Summary

1	Priority Need Name	Crime Prevention and Awareness
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP
	Associated Goals	Preservation of existing affordable housing stock. Elimination of slum and blight conditions. Support the provision of public service activities
	Description	Crime prevention and awareness was identified as a high priority need during the public outreach process. Public service project applications addressing crime prevention and awareness will receive priority points during the grant review process. The City will also prioritize requests for security improvements at not-for-profit owned single- and multi-family housing units when the majority of units house low- and moderate-income residents and/or special populations. Other sources of funding will be leveraged to support this priority when appropriate.
	Basis for Relative Priority	The City partnered with the Town of Normal and McLean County Regional Planning Commission to complete a robust citizen and stakeholder outreach process. Results of the Citizen Survey, Stakeholder Survey, focus groups and public meeting were extensively analyzed to create the priorities for this Consolidated Plan. A full analysis of the outreach process can be found in the Appendix section of this plan.

2	Priority Need Name	Job Training and Workforce Development
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP
	Associated Goals	Support the provision of public service activities Administer CDBG effectively and proficiently.
	Description	Job training and workforce development were identified as high priority needs during the public outreach process. Public service project applications addressing job training and workforce development will receive priority points during the grant review process. The City will support job training and workforce development programs as part of its anti-poverty strategy and to meet Section 3 requirements. Other sources of funding will be leveraged to support this priority when appropriate. A full analysis of the outreach process can be found in the Appendix section of this plan.
	Basis for Relative Priority	The City partnered with the Town of Normal and McLean County Regional Planning Commission to complete a robust citizen and stakeholder outreach process. Results of the Citizen Survey, Stakeholder Survey, focus groups and public meeting were extensively analyzed to create the priorities for this Consolidated Plan. Job training and workforce development was one of the most highly ranked priority areas. A full analysis of the outreach process can be found in the Appendix section of this plan.

3	Priority Need Name	Homeless Services
	Priority Level	High
	Population	Extremely Low Low Moderate Families with Children Chronic Homelessness Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Persons with Mental Disabilities Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP
	Associated Goals	Support the provision of public service activities
	Description	Homeless services were identified as high priority need during the public outreach process. Public service project applications addressing homeless prevention and other homeless services will receive priority points during the grant review process. Other sources of funding will be leveraged to support this priority when appropriate.
	Basis for Relative Priority	The City partnered with the Town of Normal and McLean County Regional Planning Commission to complete a robust citizen and stakeholder outreach process. Results of the Citizen Survey, Stakeholder Survey, focus groups and public meeting were extensively analyzed to create the priorities for this Consolidated Plan. A full analysis of the outreach process can be found in the Appendix section of this plan.

4	Priority Need Name	Housing Discrimination Services
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP
	Associated Goals	Administer CDBG effectively and proficiently.
	Description	Housing discrimination was identified as a high priority need during the public outreach process. The City will continue its partnership with Prairie State Legal Services and/or other legal service providers to support fair housing initiatives and meet Affirmatively Furthering Fair Housing (AFFH) requirements. Other sources of funding will be leveraged to support this priority when appropriate.
	Basis for Relative Priority	This priority supports the City's efforts to Affirmatively Further Fair Housing (AFFH). The City partnered with the Town of Normal and McLean County Regional Planning Commission to complete a robust citizen and stakeholder outreach process. Results of the Citizen Survey, Stakeholder Survey, focus groups and public meeting were extensively analyzed to create the priorities for this Consolidated Plan. A full analysis of the outreach process can be found in the Appendix section of this plan.

5	Priority Need Name	Renter Assistance
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP
	Associated Goals	Support the provision of public service activities
	Description	Renter assistance was identified as a high priority need during the public outreach process. Public service activity applications addressing assistance to renters will receive priority points during the grant review process. Emergency rental assistance will be limited to no more than three months assistance with payments made directly to the landlord or service provider (i.e.: utility company). Other sources of funding will be leveraged to support this priority when appropriate.
	Basis for Relative Priority	The City partnered with the Town of Normal and McLean County Regional Planning Commission to complete a robust citizen and stakeholder outreach process. Results of the Citizen Survey, Stakeholder Survey, focus groups and public meeting were extensively analyzed to create the priorities for this Consolidated Plan. A full analysis of the outreach process can be found in the Appendix section of this plan.

6	Priority Need Name	Senior Services
	Priority Level	High
	Population	Extremely Low Low Moderate Elderly Frail Elderly Persons with Physical Disabilities
	Geographic Areas Affected	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP
	Associated Goals	Support the provision of public service activities
	Description	Senior services were identified as a high priority need during the public outreach process. Public service activity applications addressing services for senior residents will receive priority points during the grant review process. Applications for assistance with housing, community centers and/ or other recreational opportunities for seniors will also receive priority. Other sources of funding will be leveraged to support this priority when appropriate.
	Basis for Relative Priority	The City partnered with the Town of Normal and McLean County Regional Planning Commission to complete a robust citizen and stakeholder outreach process. Results of the Citizen Survey, Stakeholder Survey, focus groups and public meeting were extensively analyzed to create the priorities for this Consolidated Plan. A full analysis of the outreach process can be found in the Appendix section of this plan.

7	Priority Need Name	Youth Services
	Priority Level	High
	Population	Extremely Low Low Moderate Families with Children Public Housing Residents Families with Children Non-housing Community Development
	Geographic Areas Affected	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP
	Associated Goals	Support the provision of public service activities
	Description	Youth services was identified as a high priority need during the public outreach process. Public service project applications addressing youth services will receive priority points during the grant review process. The City will also prioritize requests for public facility improvements when the majority of services provided through the facility benefit youth. Other sources of funding will be leveraged to support this priority when appropriate.
	Basis for Relative Priority	The City partnered with the Town of Normal and McLean County Regional Planning Commission to complete a robust citizen and stakeholder outreach process. Results of the Citizen Survey, Stakeholder Survey, focus groups and public meeting were extensively analyzed to create the priorities for this Consolidated Plan. A full analysis of the outreach process can be found in the Appendix section of this plan.

8	Priority Need Name	Accessibility Improvements
	Priority Level	High
	Population	Extremely Low Low Moderate Elderly Frail Elderly Persons with Physical Disabilities Persons with Developmental Disabilities Non-housing Community Development
	Geographic Areas Affected	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP
	Associated Goals	Provide quality services and facilities.
	Description	Accessibility improvements was identified as a high priority need during the public outreach process. Housing and public facility project applications addressing accessibility improvements will receive priority points during the grant review process. Other sources of funding will be leveraged to support this priority when appropriate.
	Basis for Relative Priority	The City partnered with the Town of Normal and McLean County Regional Planning Commission to complete a robust citizen and stakeholder outreach process. Results of the Citizen Survey, Stakeholder Survey, focus groups and public meeting were extensively analyzed to create the priorities for this Consolidated Plan. A full analysis of the outreach process can be found in the Appendix section of this plan.

9	Priority Need Name	Affordable Housing Preservation
	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Elderly Frail Elderly
	Geographic Areas Affected	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP
	Associated Goals	Preservation of existing affordable housing stock. Elimination of slum and blight conditions. Administer CDBG effectively and proficiently.
	Description	Affordable housing preservation and homeowner housing rehabilitation were identified as a high priority needs during the public outreach process. The City will focus on preservation of single- and multi-family units through rehabilitation. Demolition and clearance will be used as tools to replace blighted units with new affordable housing. Other sources of funding will be leveraged to support this priority when appropriate.
	Basis for Relative Priority	The City partnered with the Town of Normal and McLean County Regional Planning Commission to complete a robust citizen and stakeholder outreach process. Results of the Citizen Survey, Stakeholder Survey, focus groups and public meeting were extensively analyzed to create the priorities for this Consolidated Plan. A full analysis of the outreach process can be found in the Appendix section of this plan.

10	Priority Need Name	Business Support
	Priority Level	High
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP
	Associated Goals	Support the provision of public service activities
	Description	Business support was identified as a high priority need during the public outreach process. CDBG support for businesses will be limited to activities that create employment opportunities and/or provide job training and workforce development for low- and moderate-income residents. Other sources of funding will be leveraged to support this priority when appropriate.
	Basis for Relative Priority	The City partnered with the Town of Normal and McLean County Regional Planning Commission to complete a robust citizen and stakeholder outreach process. Results of the Citizen Survey, Stakeholder Survey, focus groups and public meeting were extensively analyzed to create the priorities for this Consolidated Plan. A full analysis of the outreach process can be found in the Appendix section of this plan.

11	Priority Need Name	Parks and Community/Recreation Centers
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Non-housing Community Development
	Geographic Areas Affected	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP
	Associated Goals	Provide quality services and facilities.
	Description	Parks and community/recreation centers was identified as a high priority need during the public outreach process. Public facility project applications addressing development and/or improvements to parks and community/recreation centers will receive priority points during the grant review process. Other sources of funding will be leveraged to support this priority when appropriate.
	Basis for Relative Priority	The City partnered with the Town of Normal and McLean County Regional Planning Commission to complete a robust citizen and stakeholder outreach process. Results of the Citizen Survey, Stakeholder Survey, focus groups and public meeting were extensively analyzed to create the priorities for this Consolidated Plan. A full analysis of the outreach process can be found in the Appendix section of this plan.

12	Priority Need Name	Sidewalk Improvements
	Priority Level	High
	Population	Extremely Low Low Moderate Elderly Frail Elderly Persons with Physical Disabilities Non-housing Community Development
	Geographic Areas Affected	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP
	Associated Goals	Provide quality services and facilities.
	Description	Sidewalk improvement was identified as a high priority need during the public outreach process. Applications addressing sidewalk improvements will receive priority points during the grant review process. Requests to improve accessibility issues will be priorities above all other sidewalk project requests. Other sources of funding will be leveraged to support this priority when appropriate.
	Basis for Relative Priority	The City partnered with the Town of Normal and McLean County Regional Planning Commission to complete a robust citizen and stakeholder outreach process. Results of the Citizen Survey, Stakeholder Survey, focus groups and public meeting were extensively analyzed to create the priorities for this Consolidated Plan. A full analysis of the outreach process can be found in the Appendix section of this plan.

13	Priority Need Name	Water and Sewer Improvements
	Priority Level	High
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP
	Associated Goals	Provide quality services and facilities.
	Description	Water and sewer improvements were identified as high priority needs during the public outreach process. CDBG funding will likely be utilized to address private water and sewer improvements for homeowners through housing rehabilitation programs. Public water and sewer improvement projects will be considered after sidewalk improvement requests. Other sources of funding will be leveraged to support this priority when appropriate.
	Basis for Relative Priority	The City partnered with the Town of Normal and McLean County Regional Planning Commission to complete a robust citizen and stakeholder outreach process. Results of the Citizen Survey, Stakeholder Survey, focus groups and public meeting were extensively analyzed to create the priorities for this Consolidated Plan. A full analysis of the outreach process can be found in the Appendix section of this plan.

Narrative (Optional) The City utilized a variety of tools to determine the 2020-2024 Consolidated Plan priority needs. Citizen participation had a huge impact on the selection process. More than 700 residents provided input on funding priorities through responses to the Citizen Survey. Nearly 40 Bloomington residents provided further input at a public meeting. A resource allocation activity conducted at the meeting allowed participants to experience constraints within CDBG guidelines such as the 15% public service cap. Stakeholders were consulted throughout the outreach process through a written survey, focus groups and participation in the public meeting. In addition to the high priority needs identified above, the following focus areas were identified as medium priorities: child care services, disability services, domestic violence services, food services, health services, mental health services, bus facility improvements, indirect rental assistance and demolition of blighted structures. Due to the large number of services identified as a high priority after a very thorough data analysis process, it is unlikely the City will utilize CDBG funding to address any medium priorities with CDBG funding. Demolition of blighted structures will be the exception as it is used to address other high priority areas such as crime prevention and affordable housing.

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The availability of rental housing units, as well as the median rent for those units, will impact the use of funds available for housing. Substantial increases in median rents or loss of either naturally occurring or income-qualified housing will affect the demand for tenant based rental assistance. The use of CDBG funds for TBRA will be subject to the amount of entitlement funding received annually. Funds may or may not be allocated to TBRA accordingly.
TBRA for Non-Homeless Special Needs	The availability of rental housing units, as well as the median rent for those units, will impact the use of funds available for housing. Substantial increases in median rents or loss of either naturally occurring or income-qualified housing will affect the demand for tenant based rental assistance for non-homeless special needs. Several housing options for non-homeless special needs are available throughout Bloomington-Normal but have high demand and long waiting lists. Service providers sight a lack of healthcare workers and the ability to fund them as barriers to adding additional housing for special needs populations. The addition or loss of these housing units and/or healthcare workers will affect the demand for TBRA for non-homeless special needs. The use of CDBG funds for TBRA for non-homeless special needs will be subject to the amount of entitlement funding received annually. Funds may or may not be allocated to TBRA accordingly.
New Unit Production	Production of new housing units will be dictated by supply and demand as well as construction and labor costs in Bloomington-Normal. The ability to produce new affordable housing, specifically, will be contingent upon the type and availability of tax credits and other sources of subsidy. The use of CDBG funds for new unit production will be subject to the amount of entitlement funding received annually and limited to only demolition for the purpose of new construction.
Rehabilitation	Rehabilitation of housing units will be influenced by material and labor costs in Bloomington-Normal as well as the pool of eligible applicants for rehabilitation assistance. The ability to rehab affordable multi-family housing, specifically, will be contingent upon the type and availability of tax credits and other sources of subsidy. The use of CDBG funds for rehabilitation will be subject to the amount of entitlement funding received annually. In addition to CDBG funding, the City will continue its participation in the Illinois Housing Development Authority's housing rehabilitation programs such as the Single Family Rehabilitation and Home Accessibility Program.

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Acquisition, including preservation	Acquisition, including preservation, will be affected by current supply and demand in the Bloomington-Normal area, as well as the price of a home. The ability to acquire and preserve property will also be contingent upon the availability of qualified nonprofits or other organizations to maintain and manage the properties. The use of CDBG funds for acquisition and preservation will be subject to fluctuations in entitlement funding the City receives annually. Funds may or may not be allocated to acquisition and preservation accordingly.

Table 3 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

The City will utilize CDBG, City general funds, and other sources of funding to support the priorities outlined in this Consolidated Plan.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	550,000	30,000	150,000	730,000	2,320,000	

Table 4 - Anticipated Resources

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 with Illinois Housing Development (IHDA) funds. The City currently has two IHDA grants, the Single Family Rehabilitation (SFR) program and Home Accessibility Program (HAP). When rehabilitation costs are beyond the IHDA program limits, the City utilizes CDBG funds to complete the project. The City will apply for SFR and HAP funding as it's made available throughout the Consolidated Plan period.

The City receives funding from IHDA's Abandoned Property Program (APP) as well. These funds are leveraged with CDBG and City general funds to support maintenance and demolition efforts on vacant, abandoned properties. Some eligible activities under APP are ineligible under CDBG guidelines and vice versa. Using both sources of funding allows the City to properly suitably the properties until disposition occurs. The City will apply for APP funding as needed to support the elimination of conditions of slum and blight.

The City uses its CDBG public service funds to support Providing Access to Help's (PATH) Homeless Services Program. 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.

The City uses its General Fund to cover the cost of staff salary and benefits for the Grants Coordinator, Rehabilitation Specialist and a Support Staff IV position, greatly reducing the administrative and service delivery costs of the program.

If appropriate, describe publicly 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 a handful of properties slated for demolition. Once cleared, the properties are typically donated to Habitat for Humanity for in-fill development of affordable housing. When City-owned housing units do not meet the criteria for demolition, the property is donated to a local not-for-profit such as Youth Build McLean County for rehabilitation and resale to an income-qualified household. The not-for-profit also has the option of renting to low- or moderate-income households. The City donates non-buildable, vacant lots to not-for-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, forming partnerships 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- and moderate-income residents. We will also continue to seek non-CDBG funding to meet priority need, as necessary.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
West Bloomington Revitalization Project	Non-profit organizations	Non-homeless special needs Planning neighborhood improvements public facilities public services	Jurisdiction
Habitat for Humanity of McLean County	Non-profit organizations	Ownership	Region
YouthBuild of McLean County	Non-profit organizations	Economic Development Ownership Rental	Region
Mid Central Community Action, Inc.	Non-profit organizations	Economic Development Non-homeless special needs Ownership Rental neighborhood improvements public facilities public services	Region
PATH (Personal Assistance Telephone)	Non-profit organizations	Homelessness public services	Region
Bloomington Housing Authority	PHA	Economic Development Non-homeless special needs Ownership Planning Public Housing Rental	Jurisdiction
McLean County Regional Planning Commission	Government	Planning	Region
Illinois Housing Development Authority	Government	Planning	State
City of Bloomington - Parks and Public Works Departments	Government	Non-homeless special needs neighborhood improvements public facilities	Jurisdiction

Table 5 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Partnerships are the backbone for the delivery of this Consolidated Plan. The partnership with McLean County Regional Planning Commission, Town of Normal, Bloomington Housing Authority, PATH and McLean County allowed for extensive outreach and analysis of needs in the development of this plan and will continue throughout its implementation. Each partner brought experience from different areas to the table. Without these partners, the City would have been unable to create plan of this quality. Partnerships with agencies providing services and housing rehabilitation are also essential to implementation of this plan.

Gaps in the delivery system include involvement from landlords and private industry. With limited funding and a significant number of identified high priority areas, the City will need additional funding outside of CDBG and more staff to meet all of the needs recognized within this plan.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X	X	

Street Outreach Services			
Law Enforcement	X		
Mobile Clinics		X	
Other Street Outreach Services		X	

Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	X
Employment and Employment Training	X	X	
Healthcare	X	X	X
HIV/AIDS	X		X
Life Skills	X	X	
Mental Health Counseling	X	X	X
Transportation	X	X	

Other			

Table 6 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The City of Bloomington is resource rich when it comes to social services for all populations. The network of services provides support and services to all sub-populations of the homeless. Services to address healthcare, legal issues, mainstream financial assistance programs, immediate shelter needs, transitional housing, and permanent supportive housing, among others, are all in place. Due to our Coordinated Entry system, there's "no wrong door" and referrals are consistently made to connect people experiencing homelessness to services. PATH's outreach efforts are particularly important in connection of services. Through street outreach, staff often meet people where they live. The Central Illinois CoC is continually working to improve its system of services, which means identifying and addressing the gaps in services. The McLean County CoC hub has monthly meetings at which stakeholders can address these issues and stay up-to-date on HUD priorities, local priorities, and issues related to homelessness.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The main strengths of the CoC service delivery system are high levels of cooperation and the ability to refer between agencies. If a client enters the homeless system at any place, even at non-CoC/ESG locations, he/she will be referred to at least one of the four major homeless service providers in the community: PATH, Home Sweet Home Ministries, Salvation Army, and/or Project Oz. From that point, people experiencing homelessness work with staff who help the client navigate the system of services. The outreach team for McLean County has effectively identified those living on the streets. During the last polar vortex, PATH was able to connect many clients with a hotel stay for several nights to avoid life-threatening weather.

As of March 2019, our CoC was recognized by the HUD and the US Interagency Council on the Homeless as having effectively ended homelessness among Veterans. This means that our community has a comprehensive response system in place that supports Veteran housing placement within 90 days of becoming homeless. Project Oz serves homeless youth through several emergency shelter options, as well as transitional housing projects. Their case management and life skills classes, as well as presence within the schools in the local area, help address youth homelessness effectively.

A gap in services exists for families with children, particularly large families (e.g., 6 kids or more). Home Sweet Home Ministries (non-CoC/ESG) is the only family homeless shelter in the area, and they have stricter guidelines for admission into their program. Based on the structure of their building and their policies, they are not able to house males 13 and over accompanied by a single mother. Such a family composition prevents some families from entering the program at all. Additionally, the shelter cannot accommodate living room space for large families. PATH is able to provide hotel stays for these families and prioritizes families with children (especially young children). However, hotel stays are typically short (e.g., 3 days) and are not a long-term solution for emergency shelter. Relocation to other cities with shelters that are able to accommodate them is a standard procedure at that point.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The Central Illinois CoC is creating a new Strategic Plan and will conduct a Gaps Analysis of the services in the area. Through this, the CoC will be able to create a data-driven strategy that can better address gaps in services. One current strategy for overcoming gaps in services is to better engage with non-CoC/ESG projects. These agencies do not have the same regulations, if any, to follow. This autonomy allows them greater freedom to create programming as needed. By increasing engagement with these agencies, we can more easily develop programs that help correct gaps in the institutional structure and service delivery system.

Lastly, when gaps are not able to be fixed within the community, the CoC has policies to relocate clients to other areas that have services in place. This is a common approach to help the unsheltered homeless who are registered sex offenders. There are only two shelters in the State of Illinois that will accept registered sex offenders.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Preservation of existing affordable housing stock.	2020	2024	Affordable Housing Public Housing	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP	Crime Prevention and Awareness Affordable Housing Preservation	CDBG:	Rental units rehabilitated: 35 Household Housing Unit Homeowner Housing Rehabilitated: 100 Household Housing Unit
2	Elimination of slum and blight conditions.	2020	2024	Affordable Housing Non-Housing Community Development	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP	Crime Prevention and Awareness Affordable Housing Preservation	CDBG: \$550,000	Homeowner Housing Added: 15 Household Housing Unit Buildings Demolished: 5 Buildings
3	Support the provision of public service activities	2020	2024	Homeless Non-Homeless Special Needs Non-Housing Community Development	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP	Crime Prevention and Awareness Job Training and Workforce Development Homeless Services Renter Assistance Senior Services Youth Services Business Support	CDBG: \$435,000	Public service activities other than Low/Moderate Income Housing Benefit: 5000 Persons Assisted Homelessness Prevention: 1500 Persons Assisted
4	Provide quality services and facilities.	2020	2024	Non-Homeless Special Needs Non-Housing Community Development	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP	Accessibility Improvements Parks and Community/ Recreation Centers Sidewalk Improvements Water and Sewer Improvements	CDBG: \$510,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3000 Persons Assisted

Table 7 – Goals Summary

Goal Descriptions

1	Goal Name	Preservation of existing affordable housing stock.
	Goal Description	The City will address the preservation of the existing affordable housing stock throughout the 2020-2024 Consolidated Plan period. Homeowner assistance will continue to be a cornerstone of its CDBG program. Assistance will be made available through a variety of activities. The City will perform housing rehabilitation through 0% interest, deferred payment loans. Loan amounts are typically capped at \$25,000 and include hard costs only. Soft costs will be covered under Rehabilitation Service Delivery. The loan program is currently available to single-family, owner-occupied households meeting income eligibility guidelines. Grants to homeowners will be made available under special circumstances. The City will fund not-for-profits organizations providing housing opportunities for low- and moderate income households and/or special populations. Housing units may be either owner-occupied or rental as long as the majority of the units are made available to income-qualified residents. CDBG will be leveraged with other resources such as the Illinois Housing Development Authority's Single Family Rehabilitation and Home Accessibility Program, when appropriate.
2	Goal Name	Elimination of slum and blight conditions.
	Goal Description	The City will address the elimination of slum and blight conditions throughout the 2020-2024 Consolidated Plan period. Demolition and clearance activities will be limited to residential properties. Rehabilitation will always be considered prior to demolition. When the property does not meet rehabilitation criteria, the City will make every attempt to replace the blighted unit(s) with new affordable housing through property donation to 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 Abandoned Property Program, when appropriate.
3	Goal Name	Support the provision of public service activities
	Goal Description	The City will support local not-for-profit organizations dedicated to providing services to low- and moderate-income residents and other special populations throughout the 2020-2024 Consolidated Plan period. Funding will be limited to programs and services addressing a high priority need or 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 for all residents throughout the 2020-2024 Consolidated Plan. Funding will primarily address City parks, public sidewalks and improvements to buildings owned by not-for-profits when at least 75% of agency clients meet income guidelines. Improvements for ADA compliance will be prioritized above other projects.
5	Goal Name	Administer CDBG effectively and proficiently.
	Goal Description	The City will strive to implement the programs and activities of the 2020-2024 Consolidated Plan in the most cost-effective, efficient and logical manner possible. 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 annual CDBG grants.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The City does not receive HOME funding. The City will create opportunities for homeownership for 12-15 low- and moderate-income households through donation of cleared properties to Habitat for Humanity. The City's website will provide links to organizations that offer down payment assistance to low- and moderate-income homebuyers. The Federal Home Loan Bank and Illinois Housing Development Authority are two examples of such agencies. The City serves as the fiscal agency for the Shelter Plus Care Continuum of Care grant, which provides rental assistance to five residents of Mayor's Manor. Additionally, the City will support rehabilitation at public housing buildings and homes under private ownership.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The Bloomington Housing Authority is not required to increase the number of accessible units.

Activities to Increase Resident Involvements

The Housing Authority provides several ongoing opportunities for resident involvement. The Housing Authority has a resident services department with three full-time and one part-time employee. Resident engagement is a significant part of this department's responsibilities.

The resident services department facilitates BHA-sponsored events such as a Health and Job 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.

Currently there are no active resident councils at the Housing Authority. However, 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.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

The Bloomington Housing Authority is not designated as "troubled".

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Increased regulatory costs and taxes are frequently cited by both developers and residents as a barrier to developing or obtaining decent, safe and affordable housing.

Additionally, the cost of retrofitting homes to improve accessibility for people with mobility limitations is often prohibitive and building accessibility features into new homes is an added cost for developers.

Affordable housing development in Illinois is strongly driven by the Illinois Housing Development Authority (IHDA)'s Opportunity Area designations, which provide incentives for affordable housing development in areas that meet certain criteria. In McLean County, some of these areas lack adequate access to transit and amenities, making affordable housing development more challenging.

There is also a shortage of landlords that are willing to rent to people with poor credit, unfavorable rent history, or criminal background. Additionally, it is difficult for people with housing choice vouchers to find landlords willing to rent to them. Comments received through the Citizen Survey reflect these challenges:

“Some landlords won’t rent to you if you say you have a housing voucher.”

“Unwillingness to rent to people with subsidized housing”

“They won’t rent to people with backgrounds.”

“Some students are not able to sign leases based on their credit score.”

Bloomington Normal Water Reclamation District (BNWRD) recently announced that they will need to spend more than \$160 million over the next couple of decades in order to make improvements required by the federal government. User fees, which currently range from \$12-\$15 per month, will go up in a series of small increases over five or 6 years. Increases in fees such as these disproportionately affect lower income homeowners as well as renters, who generally have these increases passed onto them by property owners. Building codes, fees and charges for other basic services such as waste removal or recycling, may also create financial barriers which preclude low or moderate income residents from obtaining or keeping affordable housing.

While not directly attributed to any specific public policy, one of the most prevalent barriers to affordable housing and residential investment in McLean County is low average market values in certain areas of the community. Many existing homes in these areas are not in great condition and require significant investment in order to make them livable. Due to low market values, however, the investment required to purchase and improve the property is much higher than what the property will be worth after improvements. Market conditions such as this deter potential homeowners from purchasing in these areas, as well as deter property owners from making improvements to properties they own.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The City operates homeowner housing rehabilitation programs for low- and moderate-income residents. Rehabilitation performed under the CDBG program offers up to \$25,000 in assistance via a 0% interest, deferred mortgage. The Illinois Housing Development Authority's (IHDA) Single Family Rehabilitation (SFR) program, homeowners have access to up to \$45,000 in assistance under a 0% interest, five-year forgivable mortgage. The IHDA Home Accessibility Program (HAP) offers up to \$25,000 in assistance to income-eligible, elderly and/or disabled residents for accessibility improvements. Many of the City's low- and moderate-income residents can afford their monthly mortgage payment but aren't able to afford costly repairs. Conventional funding is often not an option. The City's programs provide these owners the opportunity to maintain the quality of their affordable housing without affecting their monthly budget. The primary goal of the HAP is to keep residents in their own home rather than moving to an institution, which is quite costly.

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. In 2016, the City began the process of updating the Zoning Ordinance, adopted in 1960, to incorporate recommendations from the Comprehensive Plan. The ordinance regulates development and protects the health, safety and welfare of the public. During the update process, the City evaluated lot sizes, densities, and uses that may influence a buyer's ability to finance a home, the quality of housing stock in the City, and resident proximity to resources. The Comprehensive Plan encourages future infill-development opportunities and provides a tiered system for prioritizing development. In 2018, the City established the Downtown East Washington TIF District. Through this District, the City will promote affordable housing and infill development through several potential projects. One project is the conversion of a high school, built in 1914, being repurposed as affordable housing for senior residents.

During the outreach process for this Plan, the development of a Landlord Loss Program was mentioned frequently. The City is currently exploring this idea for possible implementation in the future. Landlords willing to rent to high risk renters meeting income guidelines would have access to funding to perform repairs if damages occur and/or rent payments if rent is in arrears. It is unclear at this time how such a program would operate or if it is feasible with available resources.

Low Income Housing Tax Credits (LIHTC) are one tool developers use to lower the cost of developing housing affordable. The application process for LIHTC is very competitive with a limited number of projects approved annually. The Regional Housing Staff Committee has met with the Local Initiatives Support Corporation (LISC) and IHDA to discuss ways to assist developers with the LIHTC application process to increase the likelihood of LIHTC awards in our community. When a LIHTC application is selected to move to Step 2 of the approval process, the developer must obtain a Certificate of Consistency with the Consolidated Plan from the City's Community Development Department. If requested, the City may also provide a mayoral letter of support for the project.

The Staff Committee is working with LISC to develop a plan to preserve existing LIHTC and Project-Based Rental Assistance (PBRA) units. An inventory of income-qualified housing units supported by programs, such as LIHTC and PBRA, was created in 2019 to assist with tracking contract expiration dates. The Committee's next step is to develop a strategy for the preservation of these units.

SP-60 Homelessness Strategy – 91.215(d)

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

Through its Homeless Services Program, PATH reaches out to individuals and families experiencing homelessness that are unsheltered. Through referrals from police departments, hospitals, social service agencies, churches, and truck stops, PATH's outreach worker will make the initial contact and begin the process of assessing the needs of the client(s).

The outreach team regularly goes into the field to visit places unfit for human habitation commonly used by the homeless. This provides opportunities to initiate relationships, assess needs, and help clients navigate the network of available resources. The outreach team is available to anyone in emergency shelter or transitional housing as well.

The outreach worker responds to those identified through the Coordinated Entry system. On a 24/7 basis, people on the streets, in shelters, or in transitional housing, can dial 211 and receive immediate support, assessment and reach Coordinated Entry staff.

With a vast database, outreach staff can make referrals to local programs and mainstream resources such as Social Security Income (SSI), Supplemental Nutrition Assistance Program (SNAP) benefits, and employment. This connection process helps lead individuals and families into permanent housing. Outreach services proactively meets the specific objectives for reducing and ending homelessness.

Given the CoC's no-wrong-door approach, someone experiencing homelessness can present anywhere and access referrals and assistance. Many people experiencing homelessness have their needs assessed through case management once they have entered into emergency shelter at Home Sweet Home Ministries, Salvation Army Safe Harbor, Neville House, Crisis Nursery, or Project Oz.

Addressing the emergency 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. The shelter also opens a warming center between October and March to provide indoor space when all beds are filled. Safe Harbor also has an employment program on site and provides transportation for job interviews. Safe Harbor is a strong partner in the Coordinated Entry system that helps move people from a shelter setting into permanent housing.

Home Sweet Home Ministries, another CoC member, provides emergency shelter for adult women and men as well as some families with dependent children with limitations. Families are generally separated by gender due to the layout of the facility. The program has been in place for over a century. The shelter started providing rapid rehousing services and has enjoyed considerable success in moving people from the shelter into permanent housing. Rapid rehousing solves the problem of separating families.

Neville House is a domestic violence shelter that is accessed through its 24/7 hotline. Case management and connection to local resources are provided. Emotional and educational support to individuals and families facing domestic violence are offered as well.

Project Oz can offer emergency shelter to youth 10-17 and 18-23, as well as case management, life skills classes, and connection to local resources. Oz provides transitional housing to homeless pregnant and parenting women age 18-21 and homeless youth at risk of sexual exploitation (18-21). Oz started a new transitional living program on July 1, 2019. The program serves homeless youth (18-23) who may be single, pregnant, or parenting.

Children's Home and Aid operates Crisis Nursery, a crisis shelter for children under the age of six. Crisis Nursery provides option for children when there are no family units available and a parent is unable to procure any other housing suitable for young children. Services are available to children in other crisis situations.

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 systems and infrastructure in place to help people experiencing homelessness have been described above. In terms of moving people to housing in the shortest amount of time, rapid rehousing programs have been the avenue to success for particular clients experiencing homelessness. Those clients who need the least amount of support are able to get quickly rehoused. Outside of the rapid rehousing program, townships and Community Action may have funds for first month's rent and deposit. The outreach worker maintains a listing of available housing, including the requirements of each landlord. This list is updated every other week and made available to those seeking rental housing.

The Bloomington Housing Authority (BHA) has a prioritization policy for people experiencing homelessness. For those experiencing homelessness, BHA has more flexibility with entrance requirements such as to prior evictions and poor landlord references. Other affordable housing complexes understanding the great importance of housing people quickly and have been receptive to receiving referrals for homeless individuals and families.

The CICoC has been recognized by the United States Interagency Council on Homelessness, Department of Housing and Urban Development, and the Department of Veterans Affairs as ending veteran homelessness. This entails finding permanent placement within 90 days of being recognized as homeless. The CICoC works closely with all veteran organizations to meet this goal.

The Coordinated Entry system keeps track of all the individuals on the Prioritization List on at least a monthly basis. Referrals are made to local transitional housing and permanent supportive housing projects.

Recycling Furniture for Families assists with free household items that help make the new housing a home.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Avoiding homelessness reduces stress on individuals, families, and the homeless service sector. CDBG funds are used to support the Emergency Grant program, which provide emergency rent/mortgage and utility assistance for individuals in imminent danger of becoming homeless. It also provides payment to local hotels for individuals experiencing homelessness. A portion of the grant assists the Self-Neglect Program with rental of dumpsters for cleanup at properties of individuals and families in imminent danger of becoming homeless due to condemnation related to hoarding issues and other code violations.

Other sources for emergency rent or utility assistance that would prevent a family from losing housing are utilized. Townships are a part of the referral process although every Township has different guidelines. Community Action has financial assistance through the Low Income Housing Energy Assistance Program (LIHEAP) and other programs that address the root issues of the fiscal crisis that puts a family at risk of homelessness.

Policies exist within the Continuum for people being discharged from institutions and systems of care. The community mental health agency is involved in the transition from a state mental health facility to the community, providing transitional apartments, a staffed boarding house, and some permanent supportive units. A day center helps with social needs and helps the person build a support system after hospitalization. Local hospitals work with the homeless outreach program when releasing a person with no identified housing. Young adults aging out of foster care or who no longer have access to family support have options within the Continuum. Project Oz has a very successful transitional housing program through which youth are placed in apartments with wrap-around supports. As skills and income increase, supports fade until the youth ages out of the program or becomes self-sufficient. Another Project Oz program for homeless youth provides housing options for those being discharged from any type of facility.

McLean County has created programs to meet the needs of people exiting a correctional institution who were homeless prior to incarceration. The Frequent User System Engagement (FUSE) program provides intensive case management and funding for permanent supportive housing. The program targets people who meet HUD's definition of chronically

homeless. The CoC works with McLean County by providing the Homeless Management Information System (HMIS) data identifying those most in need of assistance (prior consent required). Young Women's Christian Association (YWCA) Labyrinth House provides case management and transitional housing for women re-entering the community. Labyrinth can house up to ten women at two transitional housing buildings. Seeds of Hope is an organization focused on providing similar supportive services to men leaving corrections. Currently, the program provides case management only with the goal of offering transitional housing in the future.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The City follows HUD's regulations to identify and control lead hazards for all housing rehabilitation projects. The City maintains a list of contractors approved to perform housing rehabilitation through the Community Development Department. Each contractor is required to maintain certification in the Environmental Protection Agency's (EPA) Lead Safety for Renovation, Repair and Painting program (RRP). Only contractors on the approved list and with a current RRP certification are allowed to bid on housing rehabilitation projects. When abatement is required, only subcontractors certified in lead abatement are allowed to perform the abatement.

The City provides public service funding to Providing Access to Help (PATH) for its Emergency Services program. On occasion, these funds have been accessed to provide emergency shelter/rapid rehousing for income-qualified household with a child identified with a high lead level.

In September 2019, the City was awarded a National League of City's (NLC) Healthy Housing technical assistance grant. During the 18-month grant period, the City will engage with other municipalities and grant contractors to identify barriers to healthy housing, such as lead paint and water services, to develop an action plan to improve the housing stock for our residents. In December 2019, City Staff attended the NLC Healthy Housing City Leader's Forum in Charlotte, NC. The Forum provided staff the opportunity to meet with representatives from other cities as well as national experts in healthy housing initiatives. Lead was the main topic discussed throughout the meeting and will likely be one of the first areas addressed in the action plan.

How are the actions listed above related to the extent of lead poisoning and hazards?

The City has the opportunity to identify and remove lead hazards in every housing unit at which rehabilitation services are provided. The majority of the City's housing rehabilitation work is targeted in the 61701 zip code, the highest at-risk area for lead in McLean County according to the 2019 McLean County Community Health Needs Assessment (CHNA). Through the NLC Healthy Housing City Leader's Forum, the City learned more about other funding sources to leverage with CDBG to reduce lead poisoning and hazards. HUD's Lead Hazard Control, Lead Hazard Reduction and Healthy Homes grants are possible options for furthering the City's goal to reduce lead hazards and improve the quality of the housing stock for its low- and moderate-income residents.

Beginning May 1, 2020, the City will provide grants through its general fund for removal of lead water services at residential units. The Community Development Department will manage the grant program for the Public Works Department. These funds combined with CDBG could be used to meet the required match for the HUD Lead Hazard Control, Lead Hazard Reduction and Healthy Homes grant programs. Rental inspectors will be provided instruction on how to identify a potential lead service line during inspections.

How are the actions listed above integrated into housing policies and procedures?

Per program guidelines, only contractors on the approved list and with a current RRP certification are allowed to bid on housing rehabilitation projects. RRP certifications expire after five years. Therefore, the City offers the training at least once during each Consolidated Plan in an effort to maintain contractor certifications and recruit new contractors to the program.

During Year One of this Plan, the City will be looking at updating policies and procedures for housing rehabilitation projects as they relate to health hazards such as lead, radon and mold.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

This Strategic Plan's first goal is Preservation of Affordable Housing. For low- and moderate-income homeowners, their home is likely their only/primary opportunity to build wealth. The City's housing rehabilitation programs protect housing assets from falling into disrepair and increase the overall value at the same time. When homeowners have the opportunity to refinance their mortgage for a lower interest rate or a lower payment, the City's policy is to honor loan subordination requests if no cash is taken out on the new loan. Without subordination, lenders are less likely to approve the loan request.

The City also utilizes housing rehabilitation to create homeownership opportunities. The City receives several properties each year through abandonment and code enforcement. When the housing unit has deteriorated to the point that it cannot be saved, the City will demolish the structures, provide new water and sewer connections, when necessary, and donate the property to Habitat for Humanity for construction of new, affordable housing. Many of Habitat's homeowners are first-time homeowners. When properties meet rehabilitation criteria, the properties are donated to local not-for-profit organizations along with a \$25,000 rehabilitation grant. The not-for-profit then sells or rents the property to an income-qualified household. When the property is sold, proceeds, if any are reinvested in the next affordable housing project.

Job training and workforce development is identified a high priority area under this Plan. The City will utilize public service dollars to support programs providing job training and workforce development opportunities for income-qualified residents. Additionally, the City will continue to partner with the Bloomington Housing Authority to support Section 3 training for its public housing and Housing Choice Voucher program participants. Business Support is also a high priority area identified in this Plan. The City does not have plans at this time to develop a program to support local businesses. However, staff will begin researching model programs and consider amending this Plan should the need arise. The City is the fiscal agent for several Continuum of Care grants. Each of the grants offers some variety of service related to stabilizing families and individuals through job training, case management, transportation to interviews/work, access to mainstream resources needed for employment, and rental assistance, among others.

Mid Central Community Action's NextStep Financial Opportunity Center offers employment counseling, one-on-one financial coaching, credit counseling, and financial education. Other services include low-cost financial products that help build credit, savings and assets. Staff connect clients to mainstream services such as food stamps, utility assistance and health insurance as needed. The integrated approach or "bundled" services model leads to concrete gains in net income and job retention.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

The City will utilize CDBG funding throughout this Plan to support homeownership opportunities through its partnership with Habitat for Humanity and other not-for-profit organizations. The owner-occupied housing rehabilitation programs offered through the Community Development Department help to protect the home as the primary asset of low- and moderate-income homeowners. Donation of housing units for rehabilitation to not-for-profit organizations such as YouthBuild and Dreams Are Possible, will support job training in skilled-labor such as carpentry, plumbing and electrical.

SP-80 Monitoring – 91.230

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

The City of Bloomington's Community Development Department is primarily responsible for the planning and implementation of the programs outlined in this plan including but not limited to monitoring compliance with all applicable federal regulations. The City's monitoring plan is based on the standards and procedures outlined in the CDBG Monitoring Handbook published by the US Department of Housing and Urban Development.

CDBG Subrecipient Monitoring

New with this Consolidated Plan, the City will utilize a grants management software program for its CDBG programs. Through the software, the City will begin the subrecipient monitoring process at the time of application. The software will not allow an organization to submit a grant application without documents that verify compliance with many federal regulations and CDBG-specific program requirements. Collecting this information at the time of application provides an opportunity to verify agencies and programs are eligible to receive assistance prior to grant awards.

Desk monitoring is performed throughout the grant year, primarily when processing requests for reimbursements and quarterly reports. In 2017, the City moved from a system that provided 100% of grant funding to the subrecipient at the beginning of the program year to a reimbursement only system. Through this system, the City is able to monitor individual expenses for eligibility prior to payment. Progress towards program goals is monitored at the end of each quarter. The software program allows subrecipients to submit all requests for reimbursement and quarterly reports within the system, providing 24/7 access to all parties. When reports are late, the system sends a daily reminder to the subrecipient.

On-site monitoring is conducted mid-year. Prior to the monitoring visit, City staff identify the fiscal transaction and client files for review at the meeting. For fiscal transactions, staff verify that the transaction was properly recorded on the agency's general ledger and that payment occurred prior to requesting reimbursement. With the new software system, subrecipients are able to submit the financial backup via the secure software, greatly reducing the time spent on-site. Client files are reviewed to confirm eligibility for program services offered with CDBG funding.

Upon completion of all monitoring visits, letters are sent to each agency informing them of areas in which they did well and areas in need of improvement. If there were significant issues, a follow-up visit may be set as well. The activity is closed in IDIS once the mid-year monitoring is closed and the final report and all financial records for the year have been submitted to the City.



2020-2021 Action Plan



Expected Resources

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

Introduction

The City will utilize CDBG, City general funds, and other sources of funding to support the priorities outlined in this Consolidated Plan.

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	550,000	30,000	150,000	730,000	2,320,000	

Table 1 - 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 with Illinois Housing Development (IHDA) funds. The City currently has two IHDA grants, the Single Family Rehabilitation (SFR) program and Home Accessibility Program (HAP). When rehabilitation costs are beyond the IHDA program limits, the City utilizes CDBG funds to complete the project. The City will apply for SFR and HAP funding as it's made available throughout the Consolidated Plan period.

The City receives funding from IHDA's Abandoned Property Program (APP) as well. These funds are leveraged with CDBG and City general funds to support maintenance and demolition efforts on vacant, abandoned properties. Some eligible activities under APP are ineligible under CDBG guidelines and vice versa. Using both sources of funding allows the City to properly suitably the properties until disposition occurs. The City will apply for APP funding as needed to support the elimination of conditions of slum and blight.

The City uses its CDBG public service funds to support Providing Access to Help's (PATH) Homeless Services Program. 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.

The City uses its General Fund to cover the cost of staff salary and benefits for the Grants Coordinator, Rehabilitation Specialist and a Support Staff IV position, greatly reducing the administrative and service delivery costs of the program.

If appropriate, describe publicly 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 a handful of properties slated for demolition. Once cleared, the properties are typically donated to Habitat for Humanity for in-fill development of affordable housing. When City-owned housing units do not meet the criteria for demolition, the property is donated to a local not-for-profit such as Youthbuild McLean County for rehabilitation and resale to an income-qualified household. The not-for-profit also has the option of renting to low- or moderate-income households. The City donates non-buildable, vacant lots to not-for-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, forming partnerships 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- and moderate-income residents. We will also continue to seek non-CDBG funding to meet priority need, as necessary

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
1	Preservation of existing affordable housing stock.	2020	2024	Affordable Housing Public Housing	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP	Accessibility Improvements Affordable Housing Preservation	CDBG: \$272,256	Rental units rehabilitated: 16 Household Housing Unit Homeowner Housing Rehabilitated: 25 Household Housing Unit
2	Elimination of slum and blight conditions.	2020	2024	Affordable Housing Non-Housing Community Development	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP	Crime Prevention and Awareness Affordable Housing Preservation	CDBG: \$140,000	Homeowner Housing Added: 3 Household Housing Unit Buildings Demolished: 2 Buildings
3	Support the provision of public service activities	2020	2024	Homeless Non-Homeless Special Needs Non-Housing Community Development	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP	Job Training and Workforce Development Homeless Services Renter Assistance Senior Services	CDBG: \$84,744	Public service activities other than Low/Moderate Income Housing Benefit: 1280 Persons Assisted Homelessness Prevention: 220 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Provide quality services and facilities.	2020	2024	Non-Homeless Special Needs Non-Housing Community Development	WBRP Service Area LMA Regeneration Area - Outside WBRP	Job Training and Workforce Development Renter Assistance Accessibility Improvements Parks and Community/Recreation Centers Sidewalk Improvements	CDBG: \$172,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4800 Persons Assisted
5	Administer CDBG effectively and proficiently.	2020	2024	Affordable Housing Public Housing Non-Housing Community Development	LMA Preservation Area WBRP Service Area LMA Regeneration Area - Outside WBRP	Housing Discrimination Services	CDBG: \$61,000	

Table 2 – Goals Summary

Goal Descriptions

1	Goal Name	Preservation of existing affordable housing stock.
	Goal Description	The preservation of the existing affordable housing stock will be conducted throughout the 2020 Annual Action Plan. The City will perform housing rehabilitation through 0% interest, deferred payment loans. Loan amounts are typically capped at \$25,000 and include hard costs only. Soft costs will be covered under Rehabilitation Service Delivery. The loan program is currently available to single-family, owner-occupied households meeting income eligibility guidelines. Grants to homeowners will be made available under special circumstances. Habitat for Humanity will receive a grant to support its A Brush with Kindness program, which provides exterior rehabilitation for income-qualified households. The City will support Bloomington Housing Authority and not-for-profits organizations providing housing opportunities for low- and moderate income households and/or special populations, as needed. The City will continue its partnership with AMBUCS to build accessibility ramps during the 2020 program year CDBG will be leveraged with other resources such as the Illinois Housing Development Authority's Single Family Rehabilitation and Home Accessibility Program, when appropriate.
2	Goal Name	Elimination of slum and blight conditions.
	Goal Description	The City will address the elimination of slum and blight conditions throughout the 2020 Annual Action Plan. Demolition and clearance activities will be limited to residential properties. Rehabilitation will always be considered prior to demolition. When the property does not meet rehabilitation criteria, the City will make every attempt to replace the blighted unit(s) with new affordable housing through property donation to 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 Abandoned Property Program, when appropriate.

3	Goal Name	Support the provision of public service activities
	Goal Description	The City will support local not-for-profit organizations dedicated to providing services to low- and moderate-income residents and other special populations throughout the 2020 Annual Action Plan. Programs supported in Program Year 2020 include PATH's Homeless Services and Emergency Grants programs, West Bloomington Revitalization Project, Recycling Furniture for Families, Peace Meals and Dreams Are Possible. Services provided through these projects address the following high priority funding areas: homeless services, renter assistance, senior services, job training and workforce development 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 for all residents throughout the 2020 Annual Action Plan. Funding will be utilized to support accessibility improvements at Mid Central Community Action's Bloomington office. Funds will also support playground upgrades at Evergreen Park and sidewalk improvements in West Bloomington.
5	Goal Name	Administer CDBG effectively and proficiently.
	Goal Description	The City will strive to implement the programs and activities throughout the 2020 Annual Action Plan in the most cost-effective, efficient and logical manner possible. 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 annual CDBG grants.

Projects

AP-35 Projects – 91.220(d)

Introduction

The projects identified under this Annual Action Plan were chosen based on consultation completed during the development of the 2020-2024 Consolidated Plan.

Projects

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

Table 3 - Project Information

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

Funds have been allocated based on needs identified during consultation for the 2020-2024 Consolidated Plan. The City accepted applications for assistance under this Annual Action Plan. Many of the activities proposed for this action plan were selected based on recommendations from outside grant reviewers. Funds were allocated in a way that staff felt would remain true to the mission of CDBG as well as the consultation process. Public Service funding is capped at 15% per federal regulations. Although regulations cap administration funding 20%, funds allocated under this Annual Action Plan represent less than 10% of the total budget, providing the opportunity for more funding to support programs and services benefitting Bloomington's residents.

Available funding is, as always, the primary obstacle to addressing underserved needs. The needs far exceed the funding available to address them. Staff will continue to look for funding sources outside of CDBG to address the highest priorities identified in the Consolidated Plan. However, new staff position(s) are necessary to implement programs supported under new funding opportunities.

Funding allocations for each project are based on an estimated allocation of \$550,000, estimated carry-over funding of \$150,000 and estimated program income of \$30,000. Once actual revenue amounts are available, funding to support Homeowner Housing Assistance, Rehabilitation Service Delivery Costs, Residential Demolition, and/or Public Services could be increased or decreased as necessary to balance the annual budget and maintain compliance with all applicable regulations.

AP-38 Project Summary
Project Summary Information

1	Project Name	Homeowner Housing Assistance
	Target Area	LMA Regeneration Area – Outside WBRP; WBRP Service Area
	Goals Supported	Preservation of Affordable Housing
	Needs Addressed	Accessibility Improvements; Affordable Housing Preservation
	Funding	\$214,406
	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	04/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	All homeowners assisted through this project will meet HUD income guidelines. The City estimates completing 25 activities under this project.
	Location Description	Homeowner applications are accepted on a rolling cycle. There is not a waiting list at this time.
	Planned Activities	Homeowner requests for housing rehabilitation vary depending on specific needs. Work performed under this project will likely include roof, siding, door and window replacement; new soffit, fascia and gutters; new HVAC plumbing and electrical; and emergency water and sewer line replacement. Homeowner assistance is provided through a 0% interest, deferred interest mortgage. Homeowner grants are available under very limited circumstances, typically for construction of accessibility ramps and facade repairs completed through subrecipient agreement(s).
2		
	Project Name	Rental Housing Rehabilitation
	Target Area	LMA Regeneration Area - Outside WBRP - Local Target area; WBRP Service Area – Local Target area; LMA Preservation area
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Affordable Housing Preservation
	Funding	\$37,850
	Description	Rental housing rehabilitation assistance will be limited to housing owned by the Bloomington Housing Authority or a not-for-profit organization. At least 51% of units must be occupied by income-qualified households.
	Target Date	04/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Sixteen extremely-low and low-income households. All residents are age 18 or older.
	Location Description	816 W. Washington St., Bloomington, IL
	Planned Activities	The Bloomington Housing Authority will receive funding to support replacement of the boiler system at Nierstheimer Apartments.

3	Project Name	Rehabilitation Service Delivery
	Target Area	LMA Regeneration Area – Outside WBRP; WBRP Service Area; LMA Preservation Area
	Goals Supported	Affordable Housing Preservation
	Needs Addressed	Affordable Housing Preservation
	Funding	\$20,000
	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, postage, office supplies, advertising, printing and environmental testing and clearance.
	Target Date	04/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Activities will benefit beneficiaries of all housing rehabilitation projects, estimated at 25 owner-occupied housing units and 16 rental units. All households will meet income guidelines.
	Location Description	NA
	Planned Activities	No activities outside of Rehabilitation Service Delivery will occur under this project.
4	Project Name	Residential Demolition
	Target Area	LMA Regeneration Area - Outside WBRP; WBRP Service Area; LMA Preservation Area
	Goals Supported	Preservation of existing affordable housing stock; Elimination of slum and blight conditions.
	Needs Addressed	Affordable Housing Preservation
	Funding	\$135,000
	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 will always be considered prior to demolition. When a property does not meet rehabilitation criteria, the City will make every attempt to replace the blighted unit(s) with new affordable housing through property donation to Habitat for Humanity or other partners. Properties that do not meet Habitat's criteria may be offered to adjacent property owners, donated to local not-for-profits for green space, or offered for sale to the public.
	Target Date	04/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	In an average year, the City will donate 3-4 properties to Habitat for new construction. Habitat serves households at or below 50% AMI.
	Location Description	The lot selection has not yet occurred for the 2020 build season.
	Planned Activities	The City plans to complete 3 demolition and clearance activities for donation to Habitat. In turn, Habitat will build on 3-4 properties previously donated. There is typically a 1-2 year delay between demolition and construction. Two demolitions will be completed for the purpose of slum and blight elimination only. Service delivery costs, such as environmental testing, will be included under this project as well.

7		
	Project Name	Sidewalk Improvements
	Target Area	WBRP Service Area - Local Target area
	Goals Supported	Provide quality services and facilities.
	Needs Addressed	Accessibility Improvements; Sidewalk Improvements
	Funding	\$80,000
	Description	This project will support sidewalk improvements in low- and moderate-income area.
	Target Date	04/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Households within 1/2 mile of Evergreen Park, estimated at 500.
	Location Description	Sidewalk improvements will be completed primarily within the WBRP Service Area. Improvements along W. Market will be completed first. If funding remains, improvements along W. Washington and W. Front may also occur.
	Planned Activities	Sidewalk replacement, including ADA ramps, in the WBRP Service Area.
8		
	Project Name	Non-Profit Building Improvements
	Target Area	WBRP Service Area - Local Target area
	Goals Supported	Provide quality services and facilities.
	Needs Addressed	Accessibility Improvements; Business Support
	Funding	\$30,000
	Description	This project will support improvements to buildings owned by not-for-profit organizations, are open to the public, and serve primarily low- and moderate-income residents.
	Target Date	04/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	300 low- and moderate-income residents will benefit from this building improvement.
	Location Description	1301 W. Washington St., Bloomington, IL
	Planned Activities	Mid Central Community Action will receive a grant to support rehabilitation of a portion of its Bloomington office for the purpose of ADA compliance.

9		
	Project Name	CDBG General Administration
	Target Area	LMA Regeneration Area - Outside WBRP
	Goals Supported	Preservation of existing affordable housing stock; Elimination of slum and blight conditions; Support the provision of public service activities; Provide quality services and facilities; Administer CDBG effectively and proficiently.
	Needs Addressed	
	Funding	\$11,000
	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, postage, office supplies, grants management software, advertising and postage.
	Target Date	04/30/2021
	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 Community Development Department, located at 115 E. Washington St., Bloomington, IL
	Planned Activities	Grant administration will be the only activity under this project.
10		
	Project Name	CDBG Administrative Programs
	Target Area	LMA Regeneration Area - Outside WBRP; WBRP Service Area; LMA Preservation Area
	Goals Supported	Administer CDBG effectively and proficiently.
	Needs Addressed	Job Training and Workforce Development; Housing Discrimination Services
	Funding	\$25,000
	Description	This project will support programs addressing administrative requirements of the CDBG program such as fair housing and Section 3 training.
	Target Date	04/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	This project will support activities benefiting 42 low- and moderate-income residents. The majority will be renters.
	Location Description	Planning is underway for Section 3 training opportunities for public housing residents. Fair housing services will be offered through Prairie State Legal Services' Bloomington office at 201 W. Olive St.
	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.

11		
	Project Name	CDBG Planning
	Target Area	LMA Regeneration Area - Outside WBRP; WBRP Service Area; LMA Preservation Area
	Goals Supported	Preservation of existing affordable housing stock.
	Needs Addressed	Affordable Housing Preservation
	Funding	\$30,000
	Description	This project will support planning only. No direct services will be provided.
	Target Date	04/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	This project will support planning only. No direct services will be provided.
	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 policy-makers, stakeholders and the general public on affordable housing issues through a series of white-papers; assist with Consolidated Plan implementation; and support City staff with housing initiatives, as request.

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. Housing is comprised of 2/3 rental and 1/3 owner-occupied with most of the housing units at least 100 years old. Infrastructure is aging and in need of replacement.

Geographic Distribution

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

Table 4 - 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 between the WBRP Service Area and LMA Regeneration Area - Outside WBRP may vary depending on the locations of housing rehabilitation projects.

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	0
Non-Homeless	49
Special-Needs	0
Total	49

Table 5 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	5
The Production of New Units	3
Rehab of Existing Units	41
Acquisition of Existing Units	0
Total	49

Table 6 - 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:

Rental Assistance at Mayor's Manor (5 Units)
New Habitat Homes (3 Units)
Homeowner Assistance (Rehabilitation) (25 Units)
Rental Housing Assistance (Rehabilitation) (16 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

The Bloomington Housing Authority is not required to increase the number of accessible units.

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 with three full-time and one part-time employee. 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. Currently there are no active resident councils at the Housing Authority. However, 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.

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 Central Illinois Continuum of Care is in the process of creating a new Strategic Plan for the next 3 years. We are in the beginning of that process. We plan to determine the specifics for each hub area, including McLean County. We will determine the challenges and barriers to homeless services and permanent stable housing, figure out what our goals are, and implement an action plan based on our collected data. Information regarding the Strategic Plan will come from important stakeholders in the Continuum as well as from those experiencing homelessness. For the latter, we will use consumer surveys to collect data as well as casual conversations to determine if the current arrangement of services are helping clients move on to stability in their lives.

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 about PATH's outreach team is to determine the barriers and challenges faced by unsheltered clients and provide this information to the CoC to 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 will be 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, as a whole, 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. What this means is 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. So even 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 is starting to work on a new Strategic Plan. With new leadership in the Continuum, it is working to determine gaps in services, what works, and what does not. Baseline data will be collected to better determine where things are at and that can be used to determine how to move forward. New goals and expectations will be implemented. As a result of this, the CoC will determine how to best allocate limited funds 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 first year of 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 and five-year forgivable loans, 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. In 2016, the City began the process of updating the Zoning Ordinance, adopted in 1960, to incorporate recommendations from the Comprehensive Plan. The ordinance regulates development and protects the health, safety and welfare of the public. During the update process, the City evaluated lot sizes, densities, and uses that may influence a buyer's ability to finance a home, the quality of housing stock in the City, and resident proximity to resources. The Comprehensive Plan encourages future infill-development opportunities and provides a tiered system for prioritizing development.

During the outreach process for this Plan, the development of a Landlord Loss Program was mentioned frequently. The City is currently exploring this idea for possible implementation in the future. Landlords willing to rent to high risk renters meeting income guidelines would have access to funding to perform repairs if damages occur and/or rent payments if rent is in arrears. It is unclear at this time how such a program would operate or if it is feasible with available resources.

Low Income Housing Tax Credits (LIHTC) are one tool developers use to lower the cost of developing housing affordable. The application process for LIHTC is very competitive with a limited number of projects approved annually. The Regional Housing Staff Committee has met with the Local Initiatives Support Corporation (LISC) and IHDA to discuss ways to assist developers with the LIHTC application process to increase the likelihood of LIHTC awards in our community. When a LIHTC application is selected to move to Step 2 of the approval process, the developer must obtain a Certificate of Consistency with the Consolidated Plan from the City's Community Development Department. If requested, the City may also provide a mayoral letter of support for the project.

The Staff Committee is working with LISC to develop a plan to preserve existing LIHTC and Project-Based Rental Assistance (PBRA) units. An inventory of income-qualified housing units supported by programs, such as LIHTC and PBRA, was created in 2019 to assist with tracking contract expiration dates. The Committee's next step is to develop a strategy for the preservation of these units.

Discussion:

The City will continue to look at policy changes and other programs that 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 always maximizes 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 priority resources for West Bloomington residents.

Staff will continue to serve on committees and work groups that address the housing needs of low and moderate income families. The City will remain the fiscal agent for the McLean County Continuum of Care, which addresses the needs of the City's homeless. 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. The City's Grants Coordinator serves as the Staff Administrator to the Trust, a liaison between the John M. Scott Commission and the City. In FY2020/FY2021, the Commission, with Trustee approval, awarded more than \$500,000 in grants to local agencies providing health care services to the underserved.

Actions planned to foster and maintain affordable housing

Preservation of the existing affordable housing stock and 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.

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. 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 Community Development Department will partner with the City's Public Works/ Water Department starting May 1, 2020 to offer grants to homeowner to replace lead service lines. The City is serving as lead agency on a new Healthy Housing Team that will look at lead and other home hazards affecting the health of our residents.

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. The City is also supporting Dreams Are Possible with public service dollars. Dreams Are Possible is a new program that provides low-income women the opportunity to learn a skilled-trade and, thusly, earn a living wage.

Homeownership is traditionally the greatest source of an individual's wealth. The City's Homeowner Rehabilitation Program provides low and moderate income homeowners the opportunity to preserve their greatest asset. Income-qualified households can receive assistance through a 0% interest, deferred loan allowing the family to increase the value of their home without increasing their monthly bills. 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

The City is a member of the local Invest Health Team, formed to look at the built environment and how it affects the health and well-being of City residents. Through this project, the team is looking at a variety of issues affecting the health of residents in the City's 61701 zip code. This area is classified as a food desert and has limited options for healthcare. Currently, the team is exploring options for increasing access to fresh, healthy foods. Housing has been identified as an area of concern by the Invest Health team as well. The City was one of six cities in the nation to receive a National League of Cities Healthy Housing Forum technical assistance grant. Through this opportunity, the City will create an action plan to improve the health of our residents by creating healthier housing. Staff will continue to foster new partnerships that will improve the institutional delivery structure of CDBG, its priorities and other community development programs.

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(l)(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.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(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.	85.00%



Appendices





CONSOLIDATED PLAN (2020 - 2024) PUBLIC OUTREACH ANALYSIS

In order to receive Community Development Block Grant (CDBG) funds, government grantees must develop a 5-year Consolidated Plan that provides a vision for housing and community development in the jurisdiction. The plan describes community needs, resources and priorities, sets goals, and establishes strategies to meet those goals.

In prior years, the City of Bloomington and Town of Normal have independently developed and submitted separate Consolidated Plans. In response to the 2017 Regional Housing Study and the Department of Housing and Urban Development's (HUD) emphasis on inter-jurisdictional coordination, Bloomington and Normal worked with the McLean County Regional Planning Commission (MCRPC) to jointly develop their Consolidated Plans (2020-2024) for the first time.

The joint consolidated planning outreach process for the City of Bloomington and Town of Normal began in Fall 2018 with the development of the Citizen Participation Plan for both the City and Town, and continued

through July 2019. While the jurisdictions will still receive their own funding allocations and will submit individualized plans, conducting the outreach and planning processes jointly is a more effective use of resources and will allow for identifying any regional housing and community development priorities.

Website

The first step in the Consolidated Plan outreach process was to create a page on the MCRPC website dedicated to everything CDBG. The CDBG page hosts a wide variety of information, including the current state of the process, explanation of the CDBG program and eligible activities, past expenditures and a map showing eligible low- to moderate-income block groups in Bloomington and Normal. The page will continue to be used throughout the entire Consolidated Plan process to inform the community of progress.

Surveys

The first opportunity community members had to give feedback

was through a brief survey. Two different surveys were created - one to be taken by stakeholders who work with the low- to moderate-income population on a daily basis, and one for all citizens of Bloomington and Normal. The purpose of having separate surveys was to compare what service providers identified as priority issues to issues prioritized by citizens.

The Citizen Survey (Appendix A) consisted of seven open-ended and multiple choice questions. The open-ended questions asked about 1) challenges faced in finding safe, sanitary and affordable housing, 2) specific neighborhoods that should be targeted for revitalization, 3) assistance that would help expand

economic opportunities for low- to moderate-income persons, and 4) if housing discrimination exists in the respondents' community. Respondents were also provided space to enter additional comments. The multiple choice questions asked respondents to choose 1) what type of public facilities or activities they would like to see added or expanded in their community, and 2) what type of public services they would like to see added or expanded in their community.

Finally, the survey asked a series of demographic questions to provide a picture of who was responding to the survey. The Stakeholder Survey (Appendix B) asked similar questions, and will be explored later in this document.



Dedicated webpage on the MCRPC website to distribute accurate and up-to-date information on CDBG

process. Coverage from a local TV station (WEEK) and newspapers (The Normalite and Pantagraph) also helped increase the visibility of the efforts. The City, Town and MCRPC also used their social media channels (Facebook, NextDoor, Constant Contact) to promote the survey and outreach process. Feedback received in response to these posts/messages were noted and taken into account when developing the Consolidated Plan.

The Citizen Survey would not have been nearly as successful without the help of partner organizations. All three local universities (ISU, IWU and Heartland Community College) promoted the survey to their student bodies; both school districts (Unit 5 and District 87) sent emails to all parents and guardians, and PATH featured the survey multiple times in the Path-O-Gram. Other organizations including Mid-Central Community Action, West Bloomington Revitalization Project, the Penguin Project and Autism McLean promoted the survey through email and social media. The Bloomington Housing Authority also put a

copy of the survey in each June 2019 rent statement. Finally, 17 drop boxes were placed at various locations throughout Bloomington and Normal for residents who were not at one of the events or did not want to submit the survey online.

All told, 1,210 residents completed the survey: 774 from Bloomington and 430 from Normal.

Public Meetings

While the survey afforded residents an opportunity to voice their opinion via open-ended and multiple choice questions, public meetings allowed residents to interact directly with City, Town and MCRPC staff, as well as expand further on the needs and priorities they see in their community. Additionally, the public meetings afforded staff

1,210
Survey
Responses

an opportunity to discuss the purpose and intent of the CDBG program and explain some of the restrictions of the funds. Not including staff, a total of 36 residents attended the Bloomington public meeting and 23 residents attended the Normal public meeting.

After staff gave a brief overview of CDBG and discussed the survey results, attendees were

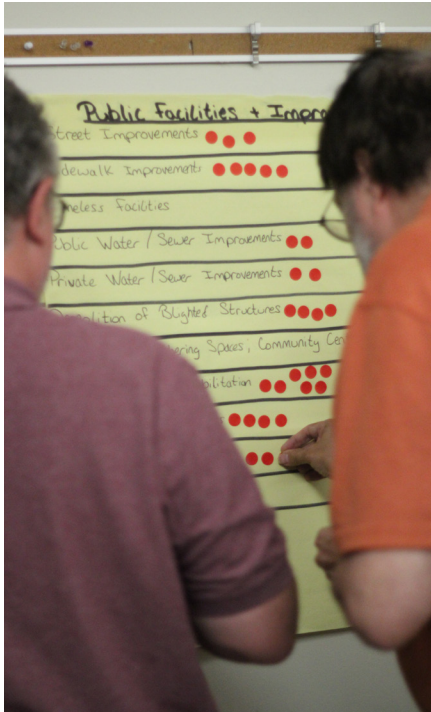
59
Attendees

asked to participate in a resource allocation activity designed to reflect the funding restrictions associated with CDBG. With a fictional \$100 representing a year's CDBG allocation, attendees were asked to distribute that money in \$5 increments between a choice of Public Services and Public Facilities and Improvements. These categories broadly reflect the eligible funding categories designated by HUD for the CDBG program. Each person received 3 blue dots



and 13 red dots with each dot representing \$5. Participants were asked to allocate the blue dots to a choice of different Public Services on a large Post-It note. By limiting the allocation to \$15, attendees were able to understand that a maximum of 15% of a yearly CDBG allocation may be used for Public Services. Participants were then asked to allocate the red dots (\$65) to a choice of Public Facilities and Improvements on a separate large Post-It note. By limiting the total allocation to \$80, attendees were able to understand that up to 20% of the yearly allocation can be used for planning and administrative costs.

Once the results were tallied, attendees were asked to expand



on why they chose to allocate the resources as they did. While many of the issues identified as priorities in the survey rose to the top again, it became clear that there were some differences, and differences of opinion, when people were given a limited amount of resources to allocate. Additionally, some issues that were not explicitly listed in the survey or allocation activity were also identified as priorities. A description of these differences can be found in the next section of this document.

Next Steps

Over the course of four months, hundreds of residents gave their input on how CDBG funds should be spent over the next 5 years. The feedback received, combined with the results of stakeholder outreach and review of existing/planned community efforts, will determine the goals and priorities that comprise Bloomington's and Normal's 2020-2024 Consolidated Plans. It became clear throughout the outreach process that the needs identified by the community far exceed CDBG resources.

The results of this process, therefore, are not limited to the Consolidated Plans, but will also inform future housing and community development efforts throughout the community.

Reading Tips

The chapters of this document explore the results of the Consolidated Plan outreach process for Bloomington and Normal separately, from a regional perspective, and from a stakeholder perspective. Chapters begin with the demographics of survey takers followed by an analysis of survey results by question.

The Bloomington and Normal chapters then present the results of the prioritization exercise at the public meetings, as well as the comments that were made during the discussion portion of those meetings.

Sample comments received throughout the outreach process are placed in the margins alongside relevant text in **purple font**. For the most part, comments within the quotations are verbatim, with some clarifications indicated by brackets. Selected facts are also placed in the margins in **blue font**.



\$\$ Prioritization Exercise

- ▶ Allocate \$15 (3 blue dots at \$5 each) to "Services"
- ▶ Allocate \$65 (13 red dots at \$5 each) to "Facilities and Activities"
- ▶ Total allocation - \$80 (up to 20% of annual allocation can be used for planning and administrative costs)



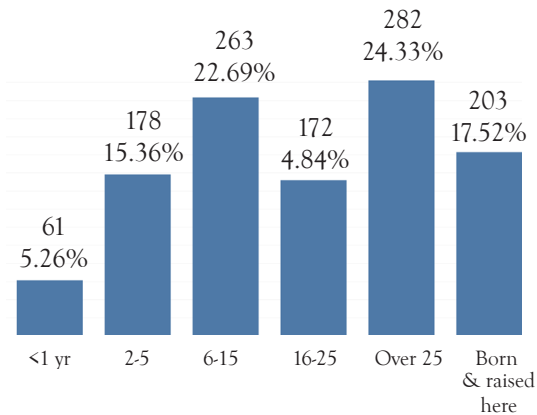
Services



Facilities and Activities

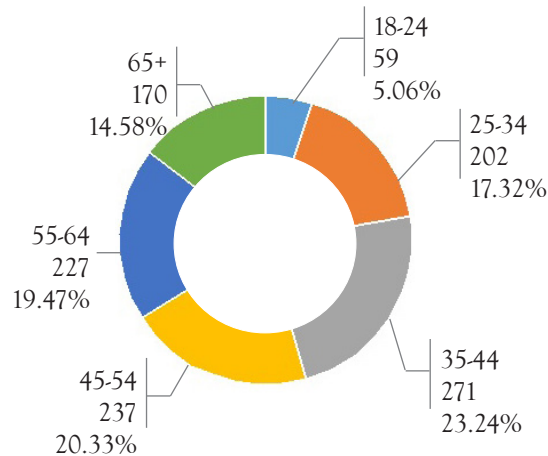
TOTAL RESPONDENTS: 1,210

How long have you lived in your current community?



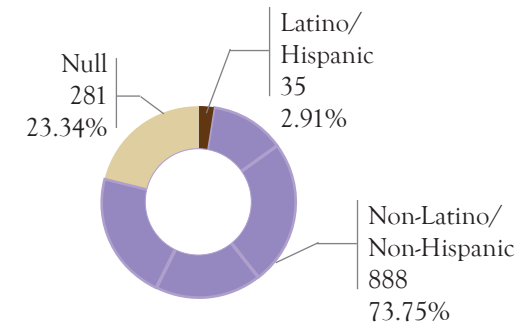
Total responses: 1,210; skipped: 44

Age



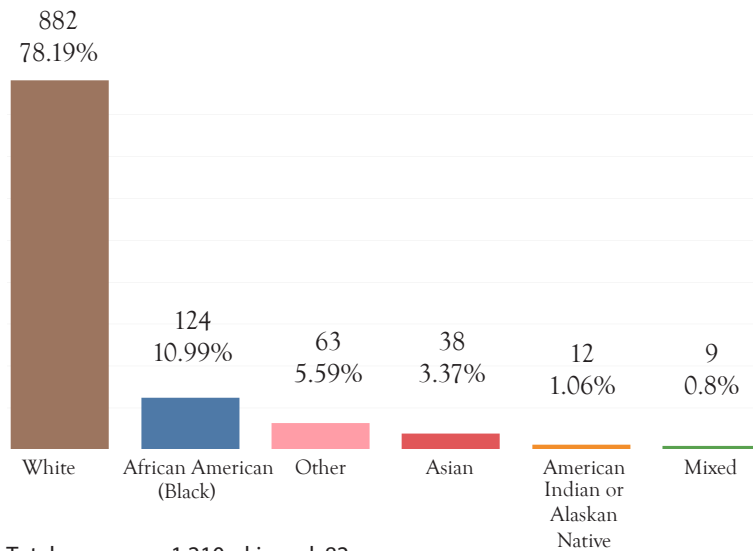
Total responses: 1,210; skipped: 65

Ethnicity



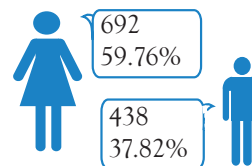
Total responses: 1,210; skipped: 6

Race



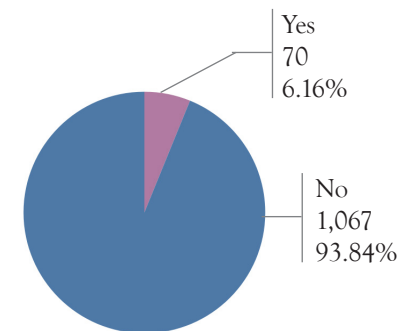
Total responses: 1,210; skipped: 82

Gender



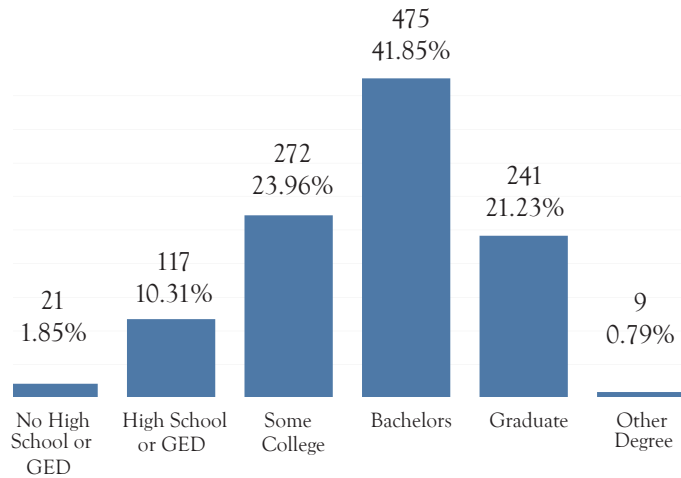
Total responses: 1,210; skipped: 52
 Gender Non Conforming: 10
 Transgender: 1
 Other: 17

Do you consider English as your second language?



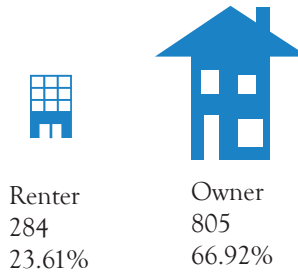
Total responses: 1,210; skipped: 73

Highest Level of Education



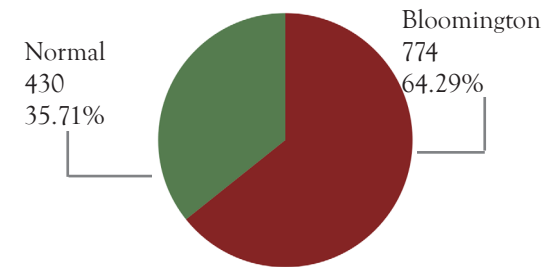
Total responses: 1,210; skipped: 75

Home Ownership



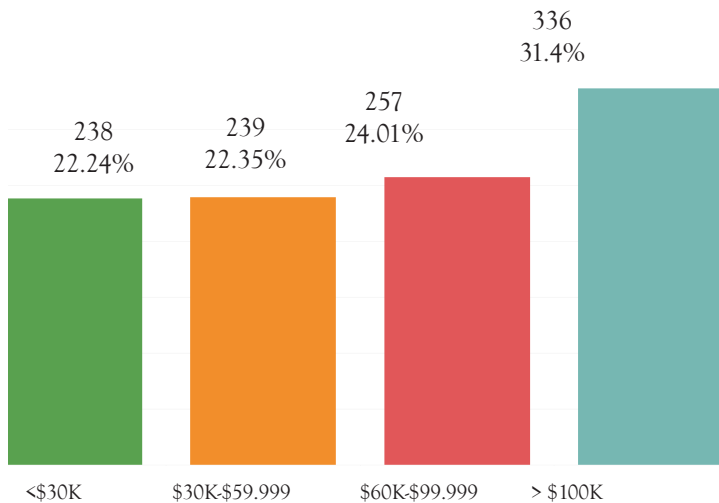
Total responses: 1210; skipped: 97

Do you live in Bloomington or Normal?



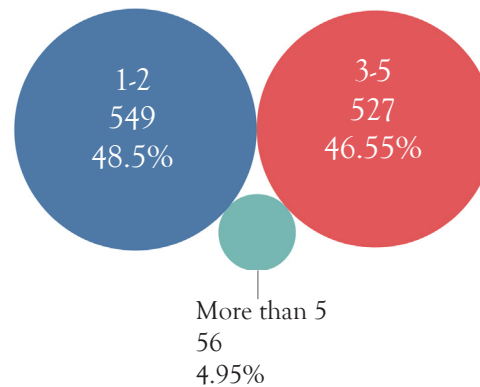
Total responses: 1,210; skipped: 6

Household Income



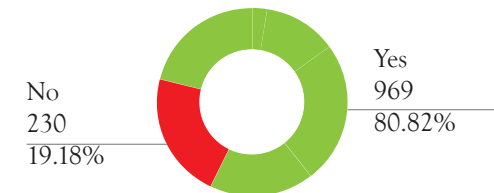
Total responses: 1,210; skipped: 140

Number of People in Household



Total responses: 1,210; skipped: 78

Are you able to easily find safe, sanitary, and affordable housing in your community?



Total responses: 1,210; skipped: 11

Survey Analysis Methodology



Each question to the survey was analyzed in several ways, including cross-tabulation with other dimensions of the survey such as age, race and income. Open-ended questions were analyzed with the creation of a “word tag” for each individual’s response based on the content of their response. Depending on the content, the response may have ended up being tagged once or several times into different categories. For example, in the open text response area for the question “Do you believe housing discrimination exists in your community?” an individual answered “Yes, by race and income.” This answer was tagged into two categories: “Discrimination Based on Race” and “Discrimination Based on Income.”

Note that the survey results are primarily focused on income. This is because the goal of Community Development Block Grant (CDBG) is to serve low- to moderate-income households. The survey originally listed four

household income brackets. However, for the purposes of survey analysis, staff decided to combine the bottom two income brackets (under \$30,000 and \$30,000- \$59,999) because these two brackets generally qualify for CDBG assistance.

A portion of the respondents in the \$60,000- \$99,999 bracket may be eligible for CDBG assistance based on their household size and other factors. Thus, staff chose to analyze in-depth the survey results for the following two income brackets: under \$60,000 and \$60,000- \$99,999.

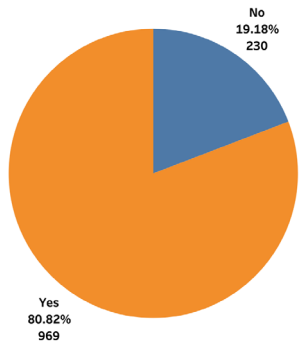
Noteworthy results by other dimensions, such as race or education level, are also included in the analysis.

The analysis of each question will be identified by a graph of answers, stacked by income level. Each question will also feature a table with the top answers by the lowest two income brackets, color coded to show which answers overlapped between the income groups. These tables allow us to visualize the top priorities by these two income brackets. The green in these tables indicates overlap in the top five priorities.



Q. Ability to Find Safe, Sanitary and Affordable Housing in Your Community

Chart O.1 – Overall Responses for All B-N Respondents



Respondents making under \$60,000, African Americans, younger respondents, renters, and those with education below a Bachelor's degree had more difficulty finding safe, sanitary and affordable housing in Bloomington and Normal.

Respondents were asked the question "Are you able to find safe, sanitary and affordable housing in your community?" Chart O.1 shows the overall responses for survey takers from both Bloomington and Normal. About 81% of respondents said "Yes," and about 19% of respondents said "No."

Chart O.2 shows respondents who replied "No" broken down by income bracket. Notice that as income goes up, the response rate of "No" to this question goes down. About 32% of respondents in the under \$60,000 annual household income bracket replied

that they are not able to find safe, sanitary and affordable housing in their community. The two higher income brackets are both well under the 19% overall average shown in the pie chart.

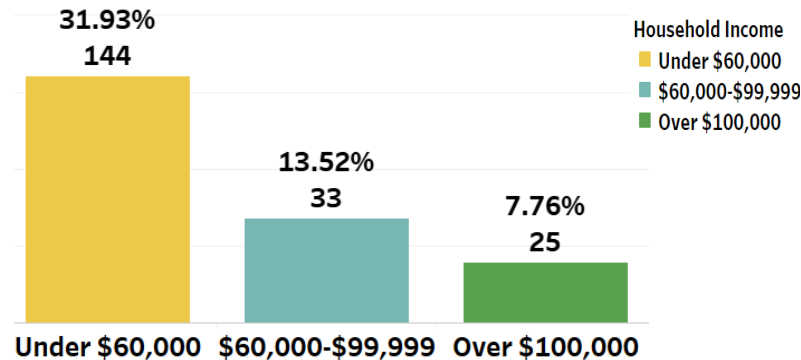
Other Demographics to Note

Of the overall 19% who responded "No" to the question regarding their ability to find safe, sanitary and affordable housing, the following groups entered a "No" response at a much higher rate than the 19% average:

- African-Americans: 33%
- American Indian or Alaskan Native: 33%
- 18-24 Age Group: 31%
- No High School Diploma: 23%
- High School Diploma or GED: 25%
- Some College: 28%
- Homeless: 80%
- Renters: 32%

"I was not able to locate a place where my total household expenses is 30% of my income. I am currently paying 42% of my income to household cost alone (rent, utilities (water, gas, electric, internet), renters insurance").

Chart O.2 – Respondents from B-N Who Answered "No"



Q. Please explain the challenges you have faced in finding safe, sanitary and affordable housing in your community

Respondents were asked to elaborate on the previous question by explaining challenges they have faced in finding safe, sanitary and affordable housing in their community. The responses to those questions were tagged by keywords and the top tagged keywords are shown in Chart O.3. Each bar on the graph is broken down by income bracket.

The top answer by far to this question was “Affordability,” followed by “Neighborhood/

Safe Area” and “Property Maintenance/Quality.” Table O.1 shows the top challenges each of the lowest two income brackets (under \$60,000 annual household income and \$60,000- \$99,999 annual household income) have faced in finding safe, sanitary and affordable housing. The green indicates overlap in the priorities. Respondents in both of these income brackets indicated they have faced “Affordability,” “Neighborhood/Safe Area,” “Property Maintenance/Quality,”

Table O.1 – Top Responses by Lowest Income Brackets

	Under \$60,000 HH Income	\$60,000 - \$99,999 HH Income
1	Affordability	Affordability
2	Neighborhood / Safe Area	Neighborhood / Safe Area
3	Property Maintenance / Quality	Property Maintenance / Quality
4	Cleanliness (Sanitary)	Cleanliness (Sanitary)
5	Lack of Supportive Housing for Persons with Disabilities	Lack of Supportive Housing for Persons with Disabilities

Note: Green indicates overlapping priorities between the two income brackets.

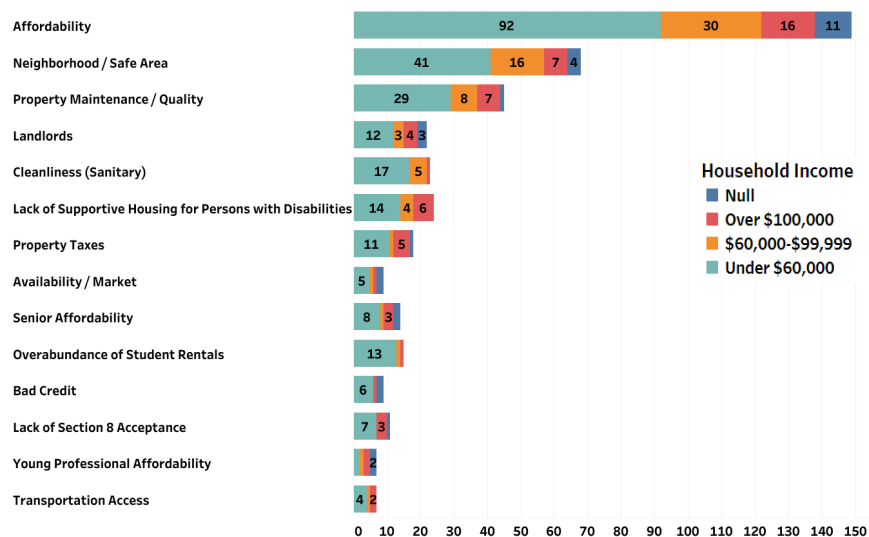
“Cleanliness (Sanitary),” and “Lack of Supportive Housing for Persons with Disabilities” issues the most when looking for housing.

Other Demographics to Note

- By Age: 35-44 and 45-54 age groups ranked “Neighborhood / Safe Area” higher than other age groups.
- By Housing Tenure: Renters ranked “Cleanliness (Sanitary)” higher than owners. Owners ranked “Property Taxes” higher.

“I work a job that I get paid \$12 an hour at. Finding a place with affordable rent is impossible. I cannot afford a rent that is over \$400 due to all the other bills I have to pay on a monthly basis. On top of paying for food, and gas, or other things that I would not normally account for.”

Chart O.3 - Overall Responses by Income Bracket



Q. Do You Believe Housing Discrimination Exists in Your Community?

Respondents were asked “Do you believe housing discrimination exists in your community?” Chart O.4 shows the overall responses. 385 (about 32%) of respondents said “No,” 352 (about 29%) of respondents said “Yes,” 136 (about 11%) replied “Don’t know,” and the rest did not reply.

Chart O.5 shows respondents broken down by income bracket. Notice that as income goes up, the response dynamics change. The under \$60,000 bracket ranks “Yes” higher than “No,” whereas the over \$100,000 bracket ranks “No” higher than “Yes.” This is an indication that those in low-income brackets likely experience more housing discrimination.

Chart O.4 - Responses for All B-N Respondents

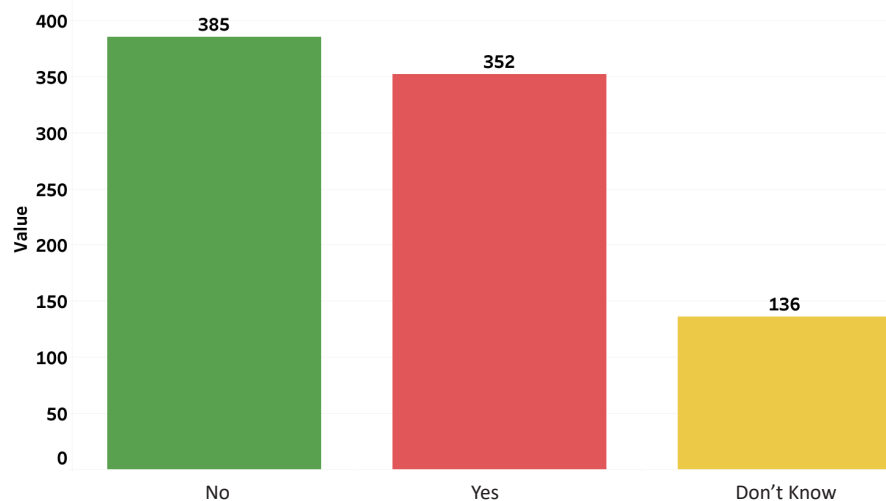
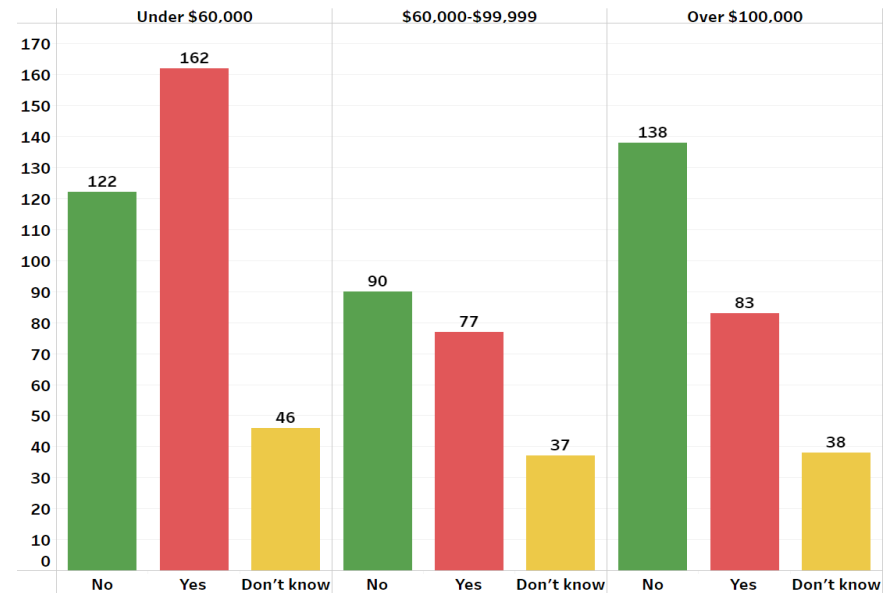


Chart O.5 - Responses for All B-N Respondents by Income Bracket



Other Demographics to Note

- By Race: African-Americans ranked “Yes” (53 responses) much higher than “No” (20 responses).
- By Age: 18-24 ranked “Yes” (27) higher than “No” (11). 25-34 ranked “Yes” (64) higher than “No” (52); all other age groups ranked “No” higher than “Yes.”
- By Gender: Females marked “Yes” (221 “Yes,” 165 “No”) much higher than males (113 “Yes,” 191 “No”).
- By Housing Tenure: Renters marked “Yes” (105 “Yes,” 65 “No”) higher than owners (214 “Yes,” 300 “No”).

Q. Please explain how you feel housing discrimination exists in your community

Respondents were asked to elaborate further on what types of discrimination they have faced or believe exists in the community. The responses to those questions were tagged by keywords and the top tagged keywords are shown in Chart O.6.

The top answer was “Discrimination Against Minority Groups,” followed by

“Possibly Exists, but Have Not Personally Experienced It,” and “Discrimination Based on Background.”

By Income

Table O.2 shows the top five types of housing discrimination each of the lowest two income brackets have faced. Four out of the top five issues overlap between

Table O.2 – Top Responses by Lowest Income Brackets

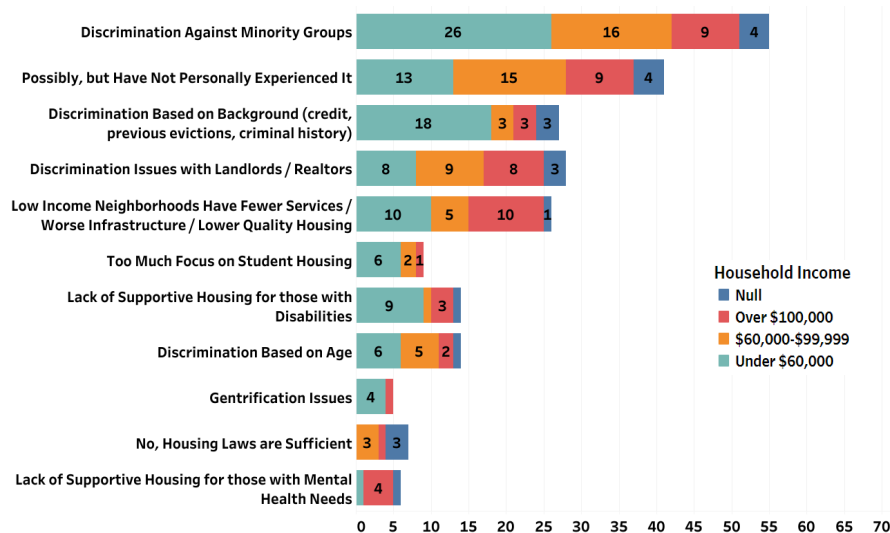
	Under \$60,000 HH Income	\$60,000 - \$99,999 HH Income
1	Income based discrimination (tie for 1 st)	Discrimination against minority groups
2	Discrimination against minority groups (tie for 1 st)	Possibly, but have not personally experienced it.
3	Discrimination Based on Background	Income based discrimination
4	Possibly, but have not personally experienced it.	Discrimination issues with landlords / realtors
5	Low income neighborhoods have fewer services / worse infrastructure / lower quality housing.	Low income neighborhoods have fewer services / worse infrastructure / lower quality housing. (tie for 5 th)
--		Discrimination based on age (tie for 5 th)

Note: Green indicates overlapping priorities between the two income brackets.

both income brackets. Note that the under \$60,000 bracket ranked “Discrimination Based on Background” much higher than all other income brackets ranked it.

- overall responses graph.
- By Education: Graduate Degree or Higher ranked “Discrimination Against Minority Groups” higher than other groups did.

Chart O.6 – Responses for All B-N Respondents by Income Bracket



Other Demographics to Note

- By Race: African Americans ranked “Discrimination Based on Background” highest, while it ranked fourth on the

Those with a Graduate degree or higher ranked “Discrimination against Minority Groups” higher than other groups, while African Americans ranked “Discrimination Based on Background” highest.

Q. What type of public facilities would you like to see added or expanded in your community?

Respondents were asked to check all answers that apply to the question “What type of public facilities would you like to see added or expanded in your community?” The top answer was by far “Street/Sidewalk Improvements.” The second most checked category was “Homeless Facilities” followed by “Water/Sewer Improvements.”

By Income

Table O.3 shows the top ten priorities for public facilities by the lowest two income brackets. “Street/Sidewalk Improvements,” “Homeless Facilities” and “Public Parks and Gathering Spaces” ranked the highest collectively. However, a notable difference between the two brackets is that the under \$60,000 bracket ranked “Community Centers” and “Recreation Centers” higher

Chart O.7 – Responses for All B-N Respondents by Income Bracket

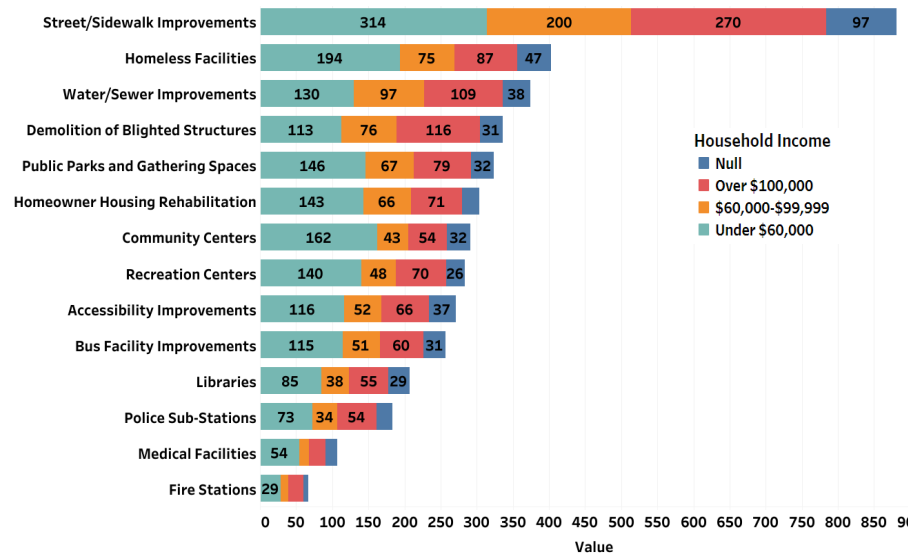


Table O.3 – Top Responses by Lowest Income Brackets

	Under \$60,000 HH Income	\$60,000 - \$99,999 HH Income
1	Street/Sidewalk Improvements	Street/Sidewalk Improvements
2	Homeless Facilities	Water/Sewer Improvements
3	Community Centers	Demolition of Blighted Structures
4	Public Parks and Gathering Spaces	Homeless Facilities
5	Homeowner Housing Rehabilitation	Public Parks and Gathering Spaces
6	Recreation Centers	Homeowner Housing Rehabilitation
7	Water/Sewer Improvements	Accessibility Improvements
8	Accessibility Improvements	Bus Facility Improvements
9	Bus Facility Improvements	Recreation Centers
10	Demolition of Blighted Structures	Community Centers

Note: Green indicates overlapping priorities between the two income brackets.

than the \$60,999- \$99,999 income bracket. “Recreation Centers” and “Community Centers” rank ninth and tenth for the \$60,000- \$99,999 bracket. The \$60,000- \$99,999 bracket ranks “Water/Sewer Improvements” and “Demolition of Blighted Structures” higher than the under \$60,000 bracket, potentially a sign of a higher rate of ownership.

came in third for this group, while it was overwhelmingly first overall.

- By Age: 45-54, 55-64 and 65+ ranked “Demolition of Blighted Structures” highly.
- By Gender: Females ranked “Community Centers” third, whereas it ranked seventh overall.
- By Housing Tenure: Renters ranked “Water/Sewer Improvements,” “Demolition of Blighted Structures” and “Homeowner Housing Rehabilitation” much lower than owners did.

Other Demographics to Note

- By Race: African Americans ranked “Community Centers” as their most desired public facility, while it ranked seventh overall. “Street/Sidewalk Improvements”

Q. What type of public services would you like to see added or expanded in your community?

Respondents were asked to check all answers that apply to the question “What type of public services would you like to see added or expanded in your community?” The top answer was “Health Services.” The second most checked category was “Mental Health Services” followed by “Youth Services.”

By Income

Table O.4 shows the top ten priorities for public services by

the lowest two income brackets. Four out of the top five priorities for both brackets match, and all in the same order. Other notable items by income are that the under \$60,000 bracket ranked “Disability Services” higher than other brackets did, and although it did not reach the top ten, the under \$60,000 had a disproportionately high ranking of “Food Services (Through Pantries).”

Table O.4 – Top Responses by Lowest Income Brackets

	Under \$60,000 HH Income	\$60,000 - \$99,999 HH Income
1	Health Services	Health Services
2	Mental Health Services	Mental Health Services
3	Youth Services	Youth Services
4	Crime Prevention/Awareness	Crime Prevention/Awareness
5	Job Training/Workforce Development	Veterans Services
6	Disability Services	Job Training/Workforce Development
7	Veterans Services	Substance Abuse Services
8	Child Care Services	Child Care Services
9	Senior Services	Bus Services
10	Bus Services	Services for the Formerly Incarcerated

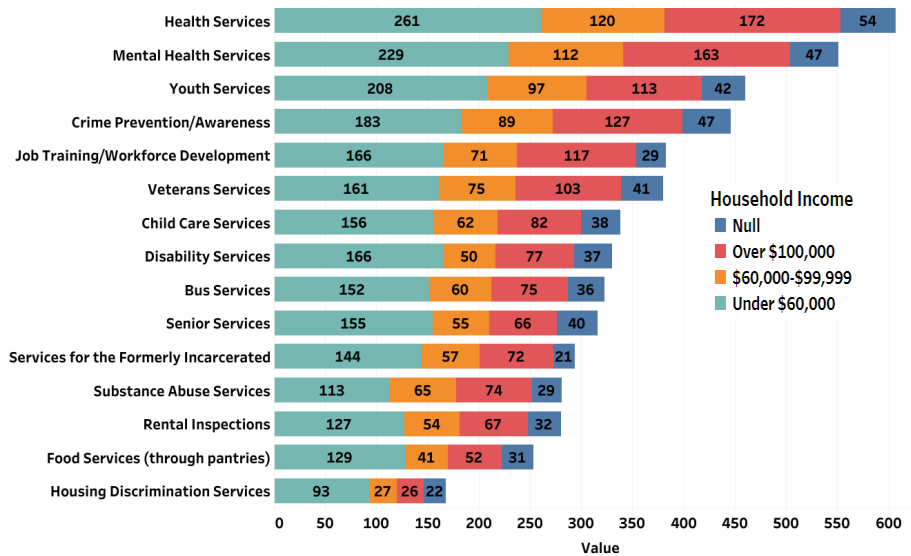
Note: Green indicates overlapping priorities between the two income brackets.

Other Demographics to Note

- By Race: African Americans ranked “Child Care Services” third and renters ranked it fourth, but “Child Care Services” was ranked seventh overall. Additionally, African Americans ranked “Housing Discrimination Services” and “Food Services” higher than they appeared in the overall rankings, but ranked “Senior Services” and “Veterans Services” much lower than they appeared in the overall rankings.

“Child care, health services, and food services. People need to have their basics taken care of to fully focus on other opportunities, like continuing education or full-time work.”

Chart O.8 – Responses for All B-N Respondents by Income Bracket



Q. What type of assistance will help expand job and economic opportunities for low- to moderate-income residents in your community?

Respondents were asked “What type of assistance will help expand job and economic opportunities for low- to moderate-income residents in your community?”

The responses to those questions were tagged by keywords and the top tagged keywords are shown in Chart O.9.

The top three tagged responses were “Job Training,” “Apprenticeships/Internships,” and “Public Transportation.”

By Income

Table O.5 shows the top types of economic assistance ranked by each of the lowest two income brackets. Three out of the top five priorities for both these income

Chart O.9 – Responses for All B-N Respondents by Income Bracket

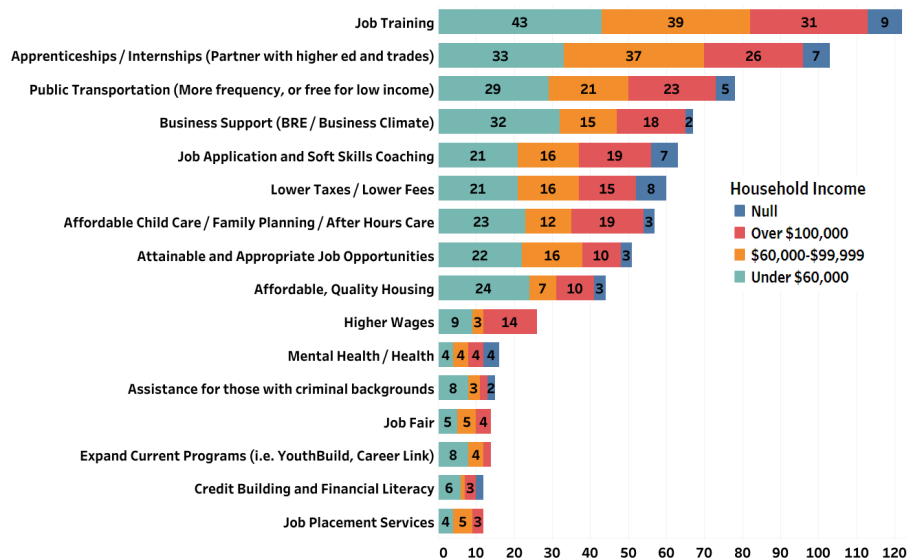


Table O.5 – Top Responses by Lowest Income Brackets

	Under \$60,000 HH Income	\$60,000 - \$99,999 HH Income
1	Job Training	Job Training
2	Apprenticeships / Internships	Apprenticeships / Internships
3	Business Support (BRE / Business Climate)	Public Transportation
4	Public Transportation	Job Application and Soft Skills Coaching
5	Affordable, Quality Housing	Lower Taxes / Lower Fees
6	Affordable Child Care / Family Planning / After Hours Care	Attainable and Appropriate Job Opportunities
7	Attainable and Appropriate Job Opportunities	Business Support (BRE / Business Climate)
8	Job Application and Soft Skills Coaching	Affordable Child Care / Family Planning / After Hours Care
9	Lower Taxes / Lower Fees	Affordable, Quality Housing
10	Higher Wages	Job Fair
--		Job Placement Services

Note: Green indicates overlapping priorities between the two income brackets.

brackets match: “Job Training,” “Apprenticeships/Internships,” and “Public Transportation.” An item of note is that the under \$60,000 bracket ranked “Affordable, Quality Housing” fifth, whereas it appears ninth in the overall results and for the \$60,000- \$99,999 bracket.

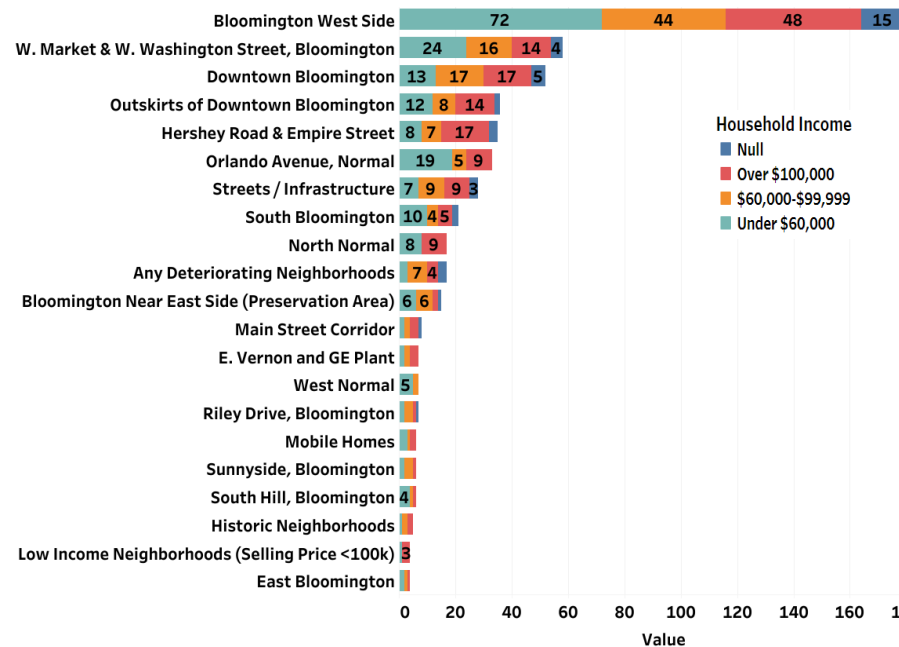
“Job training, budgeting classes, mentoring help, parenting classes, low cost daycare for children and seniors. Holding landlords accountable to provide safe housing at an affordable price.”

Q. Are there specific neighborhoods or areas within your community that should be targeted for revitalization or blight removal?

Respondents were asked the open-ended question “Are there specific neighborhoods or areas within your community that should be targeted for revitalization or blight removal?” The responses were tagged by keywords and the top tagged keywords are shown in Chart O.10.

The top responses were “Bloomington West Side,” “West Market and West Washington Streets” and “Downtown Bloomington.” All of the top five answers are within Bloomington boundaries. The first location mentioned for Normal is “Orlando Avenue,” which appears sixth on the list.

Chart O.10 – Responses for all B-N Respondents by Income Bracket



By Income

Table O.6 shows the top neighborhoods or geographic areas ranked by each of the lowest two income brackets. Four out of the top five priorities for both these income brackets match, although not in the exact same order.

Bloomington West Side was overwhelmingly ranked as a priority for targeted revitalization or blight removal.

Table O.6 – Top Responses by Lowest Income Brackets

	Under \$60,000 HH Income	\$60,000 - \$99,999 HH Income
1	Bloomington West Side	Bloomington West Side
2	W. Market & W. Washington Street, Bloomington	Downtown Bloomington
3	Orlando Avenue, Normal	W. Market & W. Washington Street, Bloomington
4	Downtown Bloomington	Streets / Infrastructure
5	Outskirts of Downtown Bloomington	Outskirts of Downtown Bloomington
6	South Bloomington	Hershey Road & Empire Street
7	Hershey Road & Empire Street	Any Deteriorating Neighborhoods
8	North Normal	Bloomington Near East Side (Preservation Area)
9	Streets / Infrastructure	Orlando Avenue, Normal
10	Bloomington Near East Side (Preservation Area)	South Bloomington

Note: Green indicates overlapping priorities between the two income brackets.

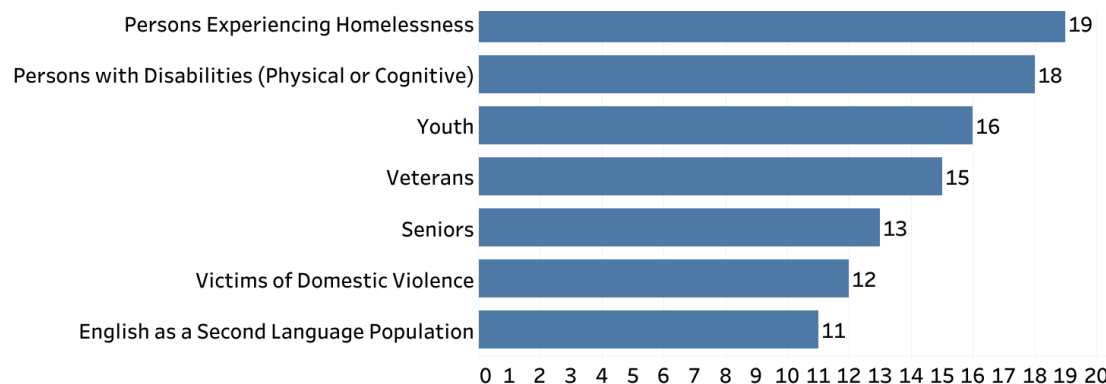
Stakeholder Survey Analysis

Staff at the McLean County Regional Planning Commission, the City of Bloomington, and the Town of Normal conducted a secondary survey alongside the citizen survey that targeted stakeholders. The stakeholders represented not-for-profits and other organizations that provide services to populations which overlap with CDBG target populations. Twenty-nine stakeholders responded to the survey. Several of the stakeholders are current recipients of CDBG funding from the City and/or the Town. Results from the stakeholder survey are described below. The stakeholder survey was considered alongside the citizen survey to determine priorities for CDBG funding.

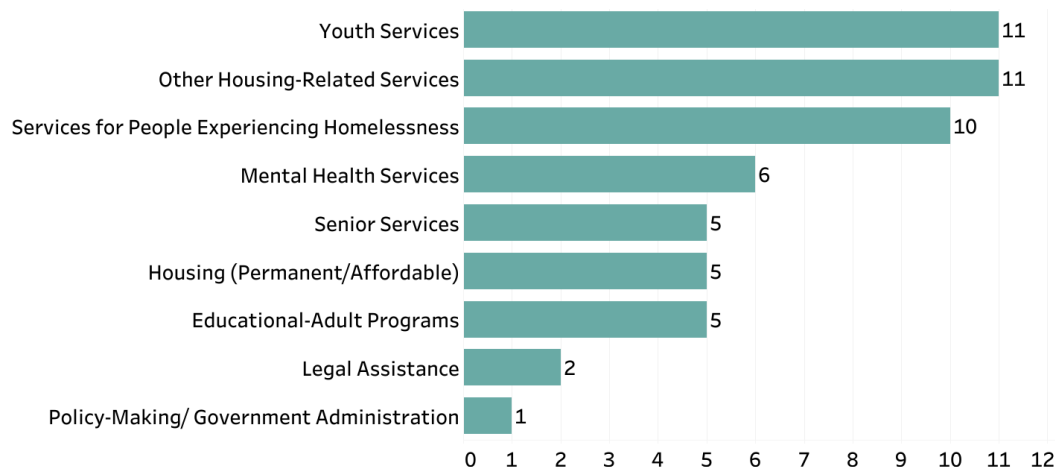
Each survey question featured four geographical answers, of which the survey respondent could choose one: “Bloomington,” “Normal,” “Both,” or “Neither.” For each question, respondents selected which geography is most relevant.

Stakeholder Demographics

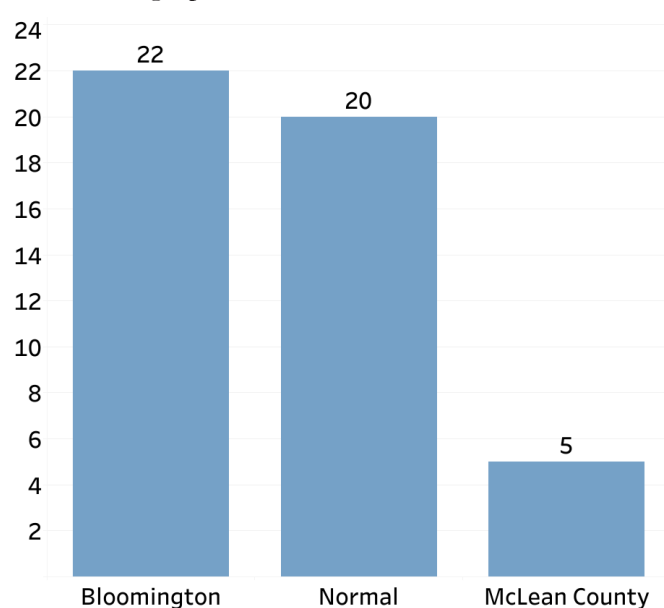
What type of clients do you serve? (Check all that apply)



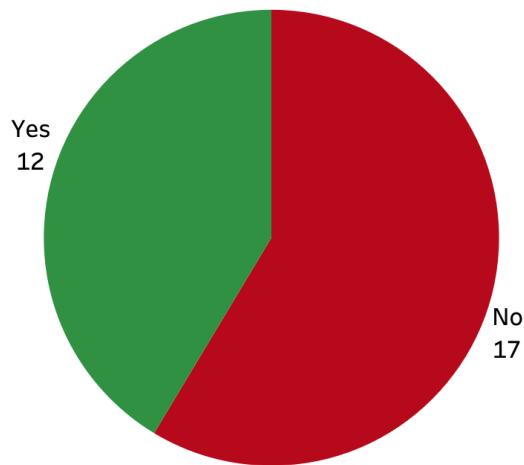
What type of services do you provide? (Check all that apply)



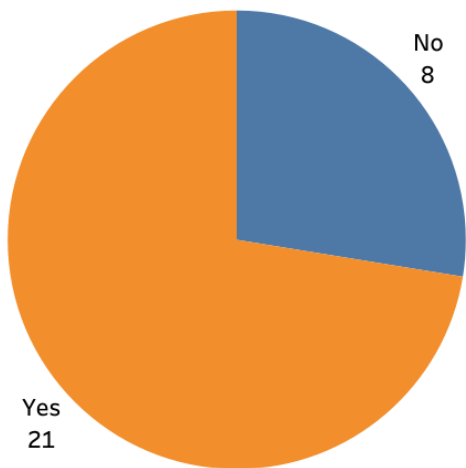
Which Geographic Areas Do You Serve? (Check all that apply)



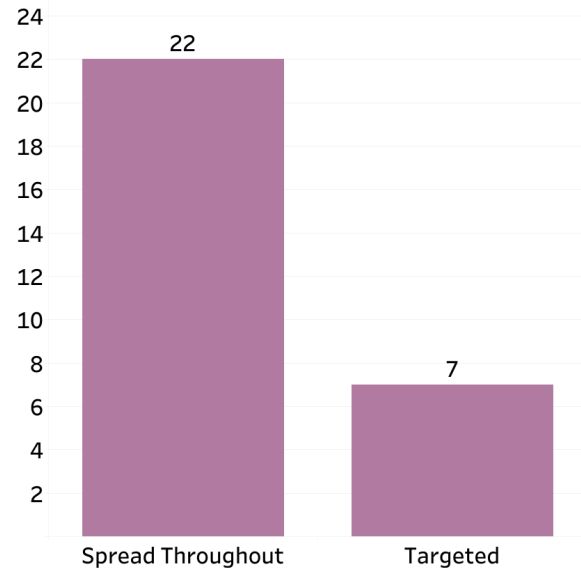
Would your organization consider involvement in administering any of the programs listed in the survey should that program be determined a high priority and funding become available?



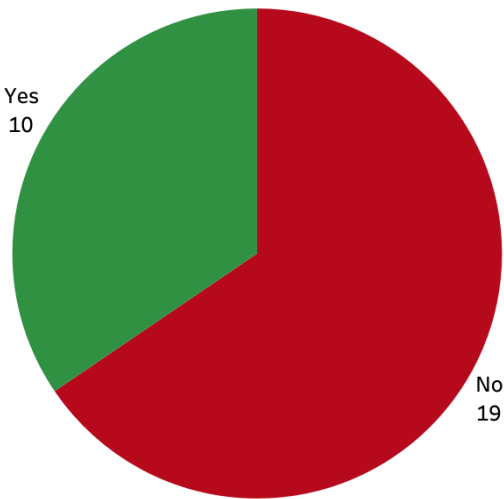
Is Your Organization a 501(c)3 or a 501(c)4?



Should CDBG funding be targeted only to specific neighborhoods in our community or spread throughout all low- to moderate-income areas?



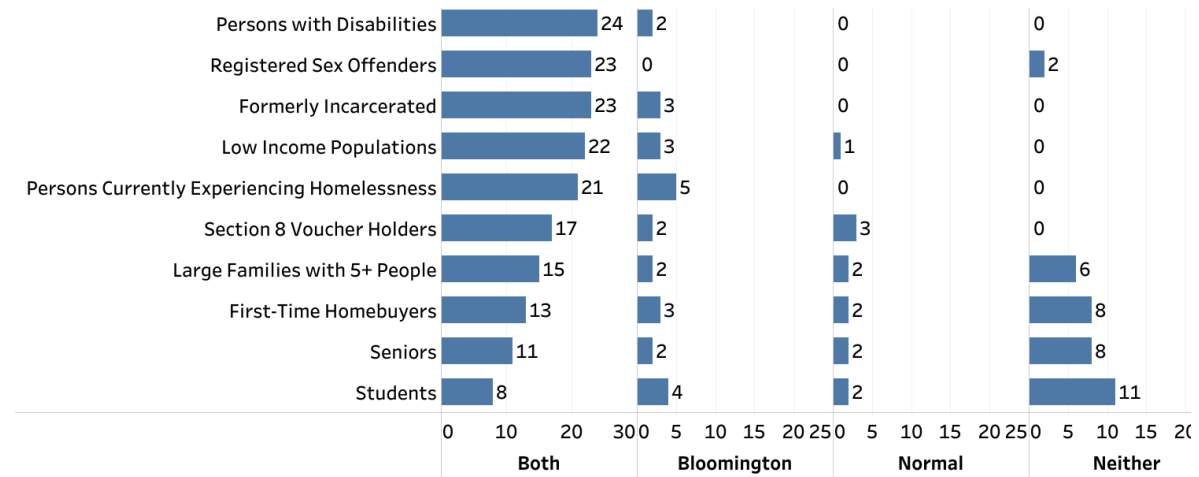
Is your organization currently administering any of the programs listed in the survey?



Q. What populations are having difficulty finding affordable housing in Bloomington-Normal?

Stakeholders were asked which populations they believe are having difficulty finding affordable housing in Bloomington-Normal. Chart S.1 shows that the highest-ranked answer among stakeholders was “Persons with Disabilities.” Stakeholders indicated that this is an issue in both Bloomington and Normal. Notice that stakeholders responded mostly with “Both” or “Neither” and not so much with one municipality over the other. Generally, all but the last three on the list were identified as having issues finding affordable housing in both Bloomington and Normal.

Chart S.1 – Stakeholder Responses by Population and Geography



Q. What type of assistance from CDBG will help address the housing affordability issues in Bloomington-Normal?

Q2.1 Ownership Programs

Stakeholders were asked which homeownership programs would help address affordable housing issues in Bloomington-Normal.

Chart S.2 shows that the highest-ranked answer was “Down-Payment Assistance,” of which the majority marked “Both” for geography.

Notice that most ownership programs were marked “Both,” but there were a significant number of respondents who only marked Bloomington for

“Repair/Rehab” (9), “Accessibility Improvements,” (9) and “Historic Preservation” (8). “Historic Preservation” had an equal response rate (8) for “Both,” “Bloomington” and “Neither,” while “New Construction” had a high response rate of “Neither.”

Chart S.2 – Stakeholder Responses by Owner Program and Geography

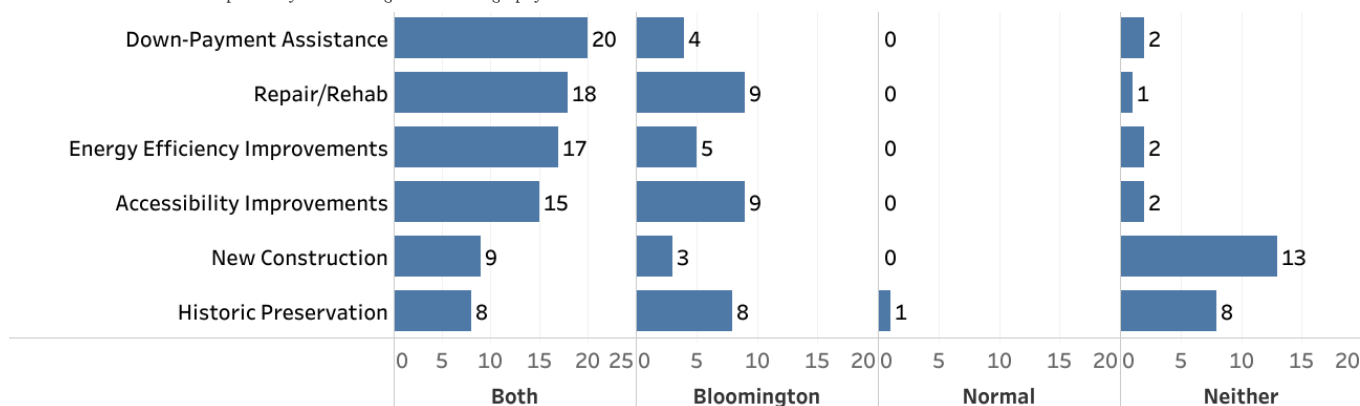
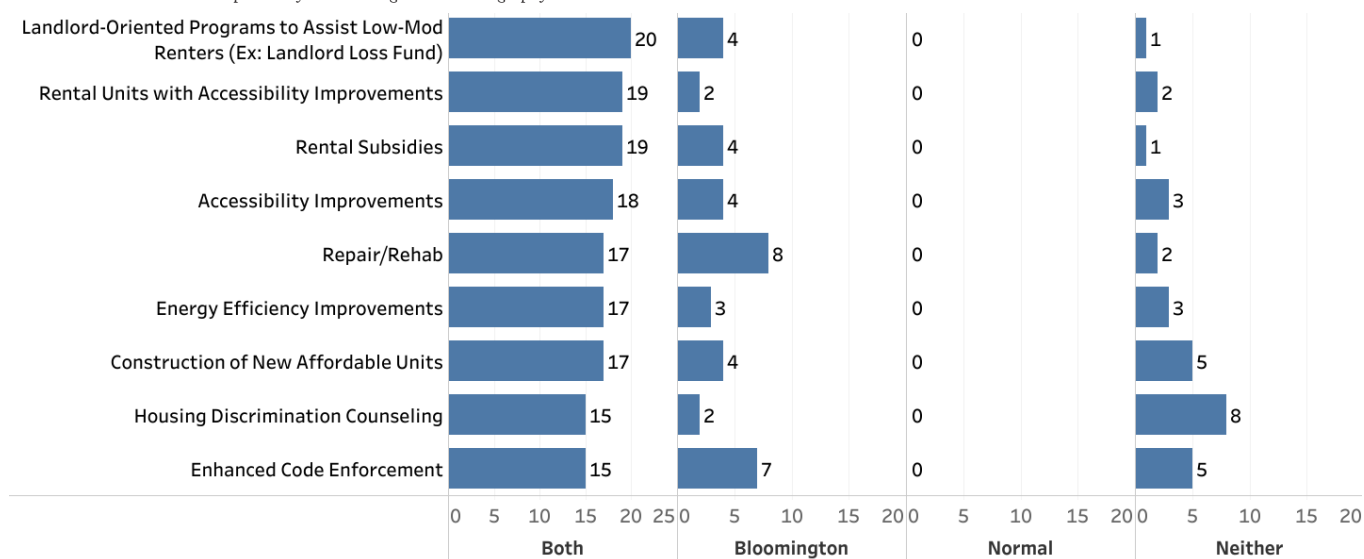


Chart S.3 – Stakeholder Responses by Rental Program and Geography



Q2.2 Rental Programs

Stakeholders were asked which rental programs would help address affordable housing issues in Bloomington-Normal. Chart S.3 shows that the highest-ranked answer was “Landlord-Oriented Programs to Assist Low-Mod Renters,” of which the majority were marked “Both” for geography. This was followed very closely by “Rental Units with Accessibility Improvements,” “Rental Subsidies,” and “Accessibility Improvements.”

Most respondents listed “Both” for all the rental program categories, but the chart shows a spike in answers just for Bloomington for “Repair/Rehab” (8) and “Enhanced Code Enforcement” (7).

Q. What type of public facilities or activities are needed or will enhance the quality of life for low- to moderate-income populations?

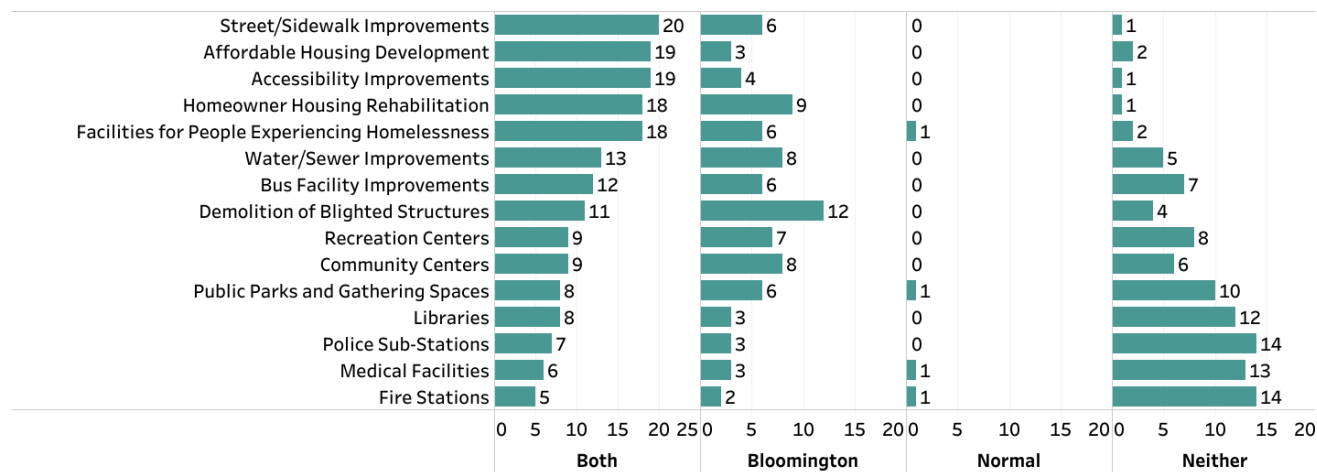
Stakeholders were asked what public facilities would enhance the quality of life for low- to moderate-income populations. Chart S.4 shows that the highest-ranked answer among stakeholders was “Street/Sidewalk Improvements.” The majority marked “Both” for this selection, although six people responded with “Bloomington Only.” This was followed very closely by “Affordable Housing Developments” and “Accessibility

Improvements.”

There was a spike in answers for “Bloomington Only” in “Homeowner Housing Rehabilitation,” “Water/Sewer Improvements,” “Demolition of Blighted Structures,” and “Community Centers.” Note that as the number of responses for “Both” decreases, the number of responses for “Neither” increases. Stakeholders indicated there is little need to utilize CDBG funds

for more “Libraries,” “Police Sub-Stations,” “Medical Facilities,” or “Fire Stations.” Responses for “Public Parks and Gathering Spaces” were split fairly evenly.

Chart S.4 – Stakeholder Responses by Public Facility Type and Geography

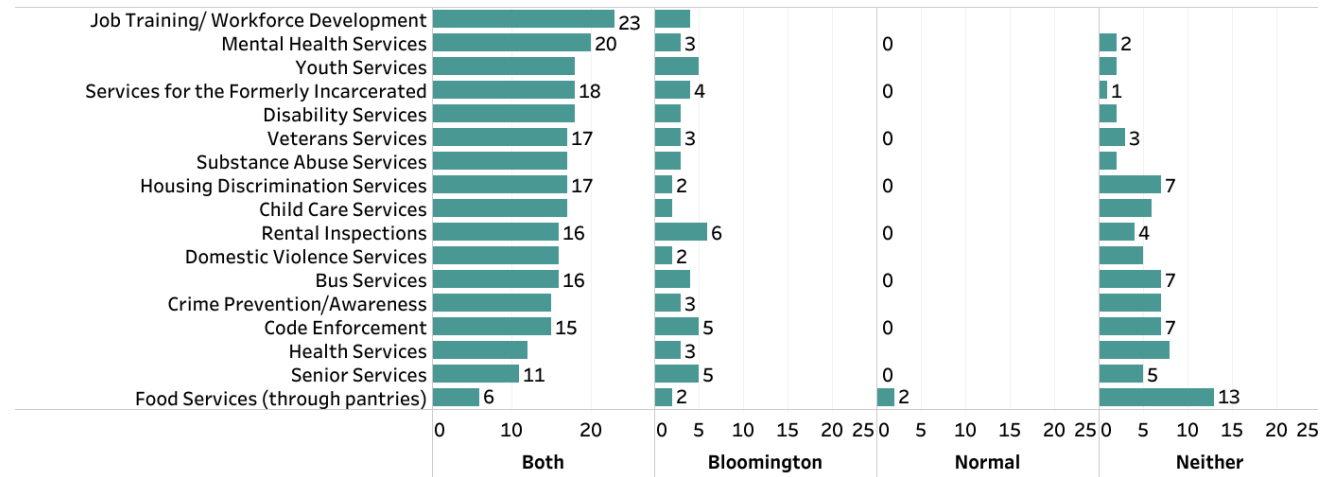


Q. What type of public services are missing or need expansion in our community to improve the quality of life for low- to moderate-income populations?

Stakeholders were asked what public services would enhance the quality of life for low- to moderate-income populations. Chart S.5 shows that the highest-ranked answer among stakeholders was “Job Training/ Workforce Development.” This was followed by “Mental Health Services.”

Stakeholders indicated there is little need for more “Food Services (through pantries),” which was the only category where “Neither” was ranked the highest.

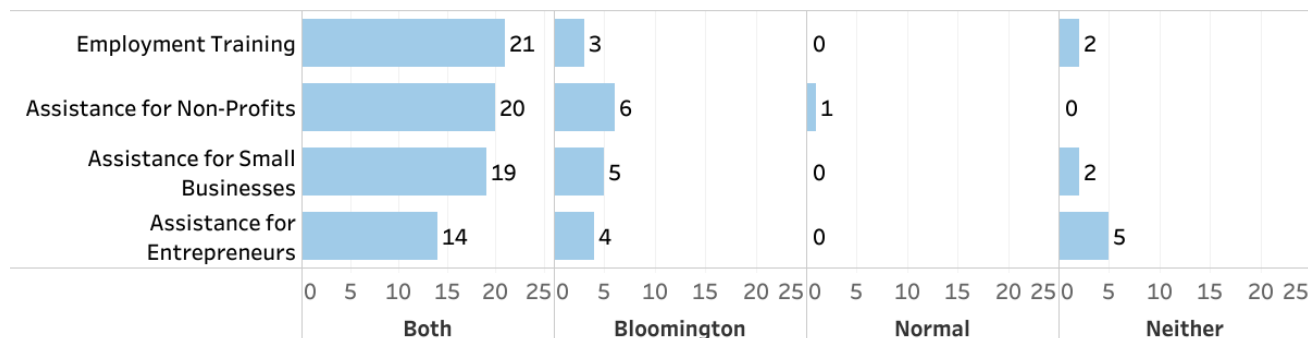
Chart S.5 – Stakeholder Responses by Public Service Type and Geography



Q. What type of assistance from CDBG will help expand economic opportunities for the low- to moderate-income population in Bloomington-Normal?

Stakeholders were asked what type of assistance from CDBG could help expand economic opportunities. Chart S.6 shows that the highest-ranked answer among stakeholders was “Employment Training,” which coincides with the top priority listing of “Job Training/ Workforce Development” in Chart S.5. The second most prevalent answer for this question was “Assistance for Non-Profits.”

Chart S.6 – Stakeholder Responses by Economic Development Program Type and Geography



Resource Allocation Exercise

The stakeholder survey also included a resource allocation exercise. Stakeholders were given a hypothetical \$100 each for Bloomington and Normal to disperse and allocate between several program types. Answers to the question were combined and converted into percentages, which provides a clearer sense of the weight of each program type.

Table S.7 shows how much weight stakeholders feel each program type should get for CDBG. For example, ownership programs received 13% of the hypothetical funding for Bloomington and 11% of the hypothetical funding for Normal. So, if Bloomington receives \$100 in CDBG funds each year, stakeholders felt that 13% of that, or in this case \$13, should go toward ownership programs.

The highest-ranked answer for both Bloomington and Normal is “Rental Programs.” Interestingly, although the percentages do not match exactly, stakeholders ranked all the programs in the same order between Bloomington and Normal.

Table S.7 – Allocation Exercise

Program Type	Bloomington		Normal	
	Percentage	Rank	Percentage	Rank
Rental Programs	21%	1	24%	1
Programs for Special Populations	16%	2	17%	2
Targeted Areas	15%	3	15%	3
Public Services	14%	4	12%	4
Ownership Programs	13%	5	11%	5 (tie)
Public Facilities	11%	6	11%	5 (tie)
Economic Development Programs	9%	7	10%	6
<i>Total</i>	<i>100%</i>		<i>100%</i>	

Stakeholder Focus Groups

Stakeholders were also given the chance to communicate directly with MCRPC, City and Town staff through a series of focus groups. Based on results of the stakeholder and citizen surveys, as well as HUD guidelines, five different topical focus groups were held:

1. Homelessness
2. Housing Programs
3. Services and Facilities
4. Health
5. Infrastructure

Not including staff, a total of 40 stakeholders attended the focus groups.

Staff gave a brief overview of CDBG regulations and procedures and discussed the results of the surveys (citizen and stakeholder). During the discussion, stakeholders were encouraged to elaborate on the needs and priorities they observe from the perspective of the populations they serve. While the discussions between focus groups differed somewhat due to their topical nature, several common threads arose:

- Many of the priorities are interconnected.
- Addressing the needs of one vulnerable group of the population addresses the needs of others. Ex: Addressing the needs of the low- to moderate-income population and persons

with disabilities should also address the needs of seniors.

- Homeownership programs, such as down payment assistance, do not benefit persons that are or are at risk of becoming homeless as greatly as rental assistance programs would.
- Be creative with the structuring of programs. Ex: direct rental subsidies to tenants would fall under the 15% cap on public services, but assisting landlords in fixing up rental properties with the stipulation that they be occupied by low- to moderate-income tenants for a certain period of time would not.
- Fund priorities that do not

have any other funding associated with them. Ex: Street improvements can be funded through sources other than CDBG.

- Sidewalks and public accessibility improvements (ramps, bus stops, etc.) were not thought of in the same negative light as CDBG-funded street resurfacings.
- Relationships between organizations and landlords are crucial for housing the hard-to-house population.

This document was produced by the McLean County Regional Planning Commission, in partnership with the City of Bloomington, Town of Normal, and the Regional Housing Staff Advisory Committee.



**REGIONAL HOUSING
INITIATIVES**



CITY OF
Bloomington
ILLINOIS



Appendix A: Citizen Survey

Bloomington and **Normal** are working to improve housing and neighborhoods, with approximately \$1 million in federal funding received each year to drive that work forward. To aid the City and Town in making good investments in each of the communities, we need your input on the needs and priorities most important to you. Please complete the brief survey and help build the future together.

Please tell us about you!

How long have you lived in your current community?

- | | |
|---|---|
| ☐ 1 year or less | ☐ 16–25 years |
| ☐ 2–5 years | ☐ Over 25 years |
| ☐ 6–15 years | ☐ Born and raised here |

Age

- | | |
|--------------------------------|--------------------------------|
| ☐ 18–24 | ☐ 45–54 |
| ☐ 25–34 | ☐ 55–64 |
| ☐ 35–44 | ☐ 65+ |

Gender

- | | |
|---|--|
| ☐ Male | ☐ Transgender |
| ☐ Female | ☐ Gender Non-Conforming |
| ☐ Other (Please Specify) | |

Race

- | |
|--|
| ☐ American Indian or Alaskan Native |
| ☐ African-American (Black) |
| ☐ Asian |
| ☐ Native Hawaiian or Other Pacific Islander |
| ☐ White |
| ☐ Other (Please Specify) |

Ethnicity

- | | |
|--|--|
| ☐ Latino/Hispanic | ☐ Non-Latino/Non-Hispanic |
|--|--|

Do you consider English as your second language?

- | | |
|------------------------------|-----------------------------|
| ☐ Yes | ☐ No |
|------------------------------|-----------------------------|

Highest Level of Education

- | |
|--|
| ☐ No High School Diploma or GED |
| ☐ High School Diploma or GED |
| ☐ Some College |
| ☐ Bachelor's Degree |
| ☐ Graduate Degree |
| ☐ Other (Please Specify) |

Household Income

- | | |
|--|--|
| ☐ Under \$30,000 | ☐ \$60,000–\$99,999 |
| ☐ \$30,000–\$59,999 | ☐ Over \$100,000 |

Home Ownership

- | | |
|---|---------------------------------|
| ☐ Owner | ☐ Renter |
| ☐ Other (Please Specify) | |

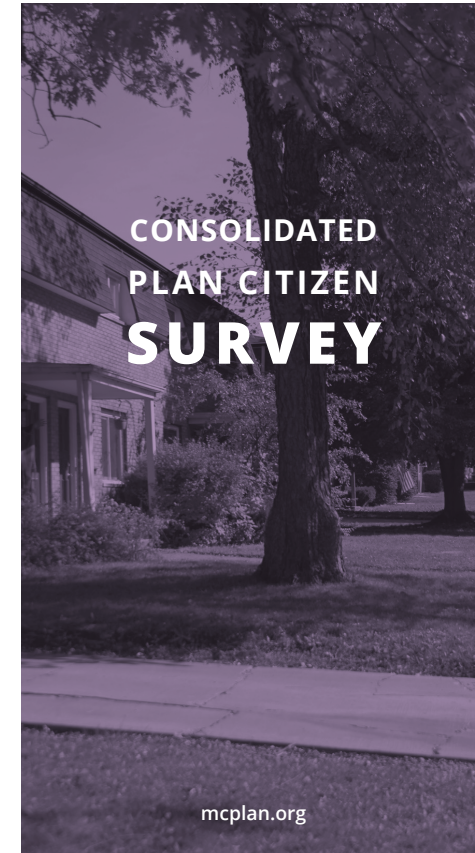
Number of People in Your Household

- | | |
|------------------------------|--------------------------------------|
| ☐ 1–2 | ☐ More than 5 |
| ☐ 3–5 | |

Please provide your address or closest intersection.

Drop boxes will be set up at various locations throughout the community to return your completed surveys. For a list of drop box locations, please visit mcplan.org.

If you prefer to take the survey online, go to mcplan.org or scan the QR code.



CONSOLIDATED PLAN CITIZEN SURVEY

Do you live in Bloomington or Normal?

- ☐ Bloomington ☐ Normal

Are you able to easily find safe, sanitary, and affordable housing in your community?

- ☐ Yes ☐ No

Please explain the challenges you have faced in finding safe, sanitary, and affordable housing in your community.

What type of public facilities or activities would you like to see added or expanded in your community? Select all that apply.

- ☐ Accessibility Improvements
☐ Bus Facility Improvements
☐ Community Centers
☐ Demolition of Blighted Structures
☐ Fire Stations
☐ Homeless Facilities
☐ Homeowner Housing Rehabilitation
☐ Libraries
☐ Medical Facilities
☐ Police Sub-Station
☐ Public Parks and Gathering Spaces
☐ Recreation Centers
☐ Street/Sidewalk Improvements
☐ Water/Sewer Improvements
☐ Other (Please Specify Below)

What type of public services would you like to see added or expanded in your community? Select all that apply.

- ☐ Bus Services
☐ Child Care Services
☐ Code Enforcement
☐ Crime Prevention/Awareness
☐ Disability Services
☐ Food Services (through pantries)
☐ Health Services
☐ Housing Discrimination Services Job
☐ Training/Workforce Development
☐ Mental Health Services
☐ Rental Inspections
☐ Senior Services
☐ Services for the Formerly Incarcerated
☐ Substance Abuse Services
☐ Veterans Services
☐ Youth Services
☐ Other (Please Specify Below)

Are there specific neighborhoods or areas within your community that should be targeted for revitalization or blight removal? If yes, please provide the name of the neighborhood or describe the general area.

- ☐ Yes ☐ No

What type of assistance will help expand job and economic opportunities for low- to moderate-income residents in your community?

Do you believe housing discrimination exists in your community? Explain.

Any additional comments?

Appendix B: Stakeholder Survey

The Community Development Block Grant Program (CDBG) through the Department of Housing and Urban Development (HUD) provides annual grants on a formula basis to cities and counties to develop viable urban communities by providing decent housing, a suitable living environment, and expanding economic opportunities, principally for low- and moderate-income persons. CDBG funding has been decreasing for the past several decades.

As the City and the Town are gearing up to plan for their CDBG program delivery for the next five years, input from stakeholders like you is critical to ensure that these limited resources are being allocated efficiently. Most of the survey is regionally oriented but provides opportunities to identify gaps or opportunities specific to Bloomington or Normal.

As a key stakeholder, we request that you complete the survey to help guide future CDBG programming so it best meets the needs of our community. Please take a few moments to review the survey then carefully consider the best staff person to complete the survey for your organization. We estimate that the survey will take 20-25 minutes to complete. We look forward to hearing back from your organization.

Is your organization a 501 (c)(3) or a 501(c)(4)?

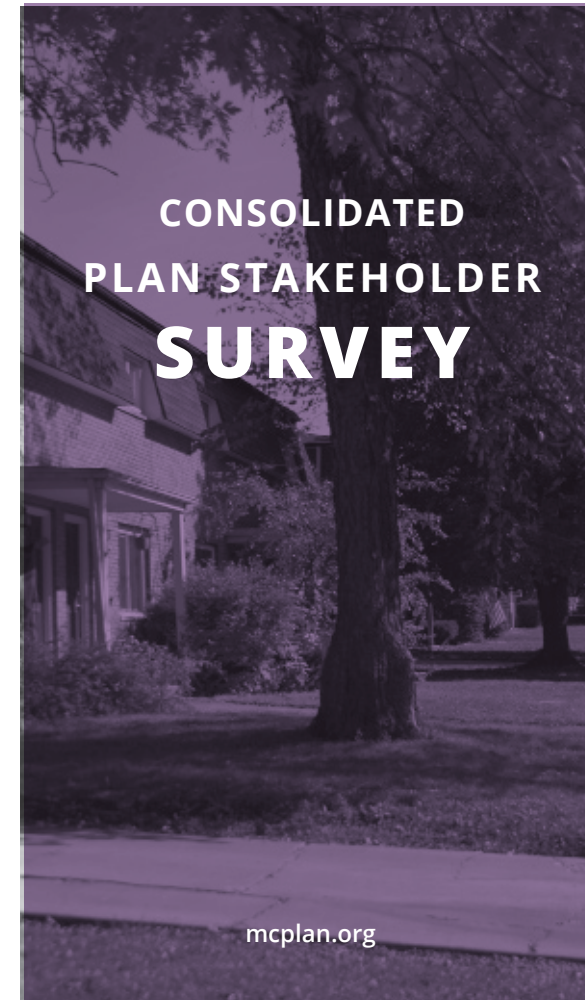
- ☐ Yes
- ☐ No

What type of clients do you serve? Check all that apply.

- ☐ Educational- Adult Programs
 - ☐ Housing (Permanent/Affordable)
 - ☐ Legal Assistance
 - ☐ Mental Health Services
 - ☐ Other Housing-Related Services
 - ☐ Policy-Making/ Government Administration
 - ☐ Senior Services
 - ☐ Services for People Experiencing Homelessness
 - ☐ Youth Services
 - ☐ Other (Please Explain Below)
-

Which geographic areas do you serve? Check all that apply.

- ☐ Bloomington
 - ☐ Normal
 - ☐ Other (Please Explain Below)
-



CONSOLIDATED PLAN STAKEHOLDER SURVEY

How difficult is it for low- to moderate-income populations to obtain safe, sanitary and affordable housing in Bloomington-Normal?

What are the challenges to achieving affordability in Bloomington-Normal?

What populations are having difficulty finding affordable housing in Bloomington-Normal?

First-Time Homebuyers

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Formerly Incarcerated

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Large Families with 5+ People

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Low Income Populations

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Persons Currently Experiencing Homelessness

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Persons with Disabilities

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Registered Sex Offenders

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Section 8 Voucher Holders

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Seniors

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Students

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Others (Please Specify Below)

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither
-

What type of assistance from CDBG will help address the housing affordability issues in Bloomington-Normal?

Ownership Programs

Accessibility Improvements

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Down-Payment Assistance

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Energy Efficiency Improvements

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Historic Preservation

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

New Construction

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Repair/Rehab

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Other (Please Specify Below)

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither
-

Rental Programs

Accessibility Improvements

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Construction of New Affordable Units

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Energy Efficiency Improvements

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Enhanced Code Enforcements

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Housing Discrimination Counseling

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Landlord-Oriented Programs to Assist Low-Mod Renters (Ex: Landlord Loss Fund)

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Rental Subsidies

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Repair/Rehab

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Other (Please Specify Below)

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Programs for Special Populations

Assisted Housing for Persons with Disabilities

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Assisted Housing for Seniors

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Group Housing

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Housing for Persons Experiencing Homelessness

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Supportive Housing

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Other (Please Specify Below)

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Is your organization currently administering any of the programs listed above?

- ☐ Yes
☐ No

If yes, provide details here

Would your organization consider involvement in administering any of the programs listed above should that program be determined a high priority and funding become available?

- ☐ Yes
☐ No

If yes, provide details here

Public Facilities: What type of public facilities or activities are needed or will enhance the quality of life for low- to moderate-income population?

Accessibility Improvements

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Affordable Housing Development

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Bus Facility Improvements

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Community Centers

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Demolition of Blighted Structures

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

CONSOLIDATED PLAN STAKEHOLDER SURVEY

Facilities for People Experiencing Homelessness

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Fire Stations

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Homeowner Housing Rehabilitation

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Libraries

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Medical Facilities

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Police Sub-Stations

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Public Parks and Gathering Spaces

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Repair/Rehab

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Public Parks and Gathering Spaces

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Recreation Centers

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Street/Sidewalk Improvements

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Water/Sewer Improvements

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Other (Please Specify Below)

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Public Services: What type of public services or activities are needed or will enhance the quality of life for low- to moderate-income population?

Bus Services

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Child Care Services

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Code Enforcement

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Crime Prevention/Awareness

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Disability Services

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Domestic Violence Services

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Food Services (through pantries)

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Health Services

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Housing Discrimination Services

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Job Training/Workforce Development

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Mental Health Services

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Rental Inspections

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Senior Services

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

CONSOLIDATED PLAN STAKEHOLDER SURVEY

Services for the Formerly Incarcerated

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Substance Abuse Services

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Veterans Services

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Youth Services

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Other (Please Specify Below)

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Should CDBG funding be targeted only to specific neighborhoods in our community or be spread throughout all low- to moderate-income areas?

- ☐ Targeted
☐ Spread Throughout

If you answered "targeted" to the previous questions, please provide the boundaries or name of the neighborhood(s).

Economic Development Programs: What type of assistance from CDBG will help expand economic opportunities for the low- to moderate-income population in Bloomington-Normal?

Assistance for Entrepreneurs

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Assistance for Non-Profits

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Assistance for Small Businesses

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Employment Training

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Other (Please Specify Below)

- ☐ Bloomington ☐ Both
☐ Normal ☐ Neither

Prioritization: If the communities only received \$100 in CDBG funding, how would you suggest they prioritize spending those funds? (Divide \$100 between activities in Bloomington and \$100 between activities in Normal)

	Bloomington	Normal
Ownership Programs		
Rental Programs		
Programs for Special Populations		
Public Facilities		
Public Services		
Targeted Areas		
Economic Development Programs		

Final Thoughts: Do you have any other comments about funding priorities for the CDBG program in Bloomington?

Do you have any other comments about funding priorities for the CDBG program in Normal?

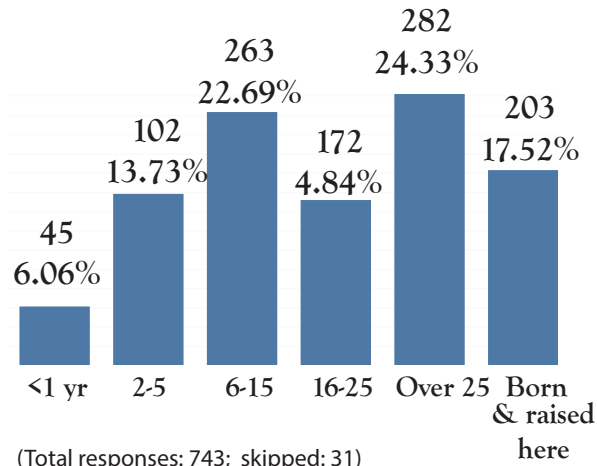


CITY OF BLOOMINGTON

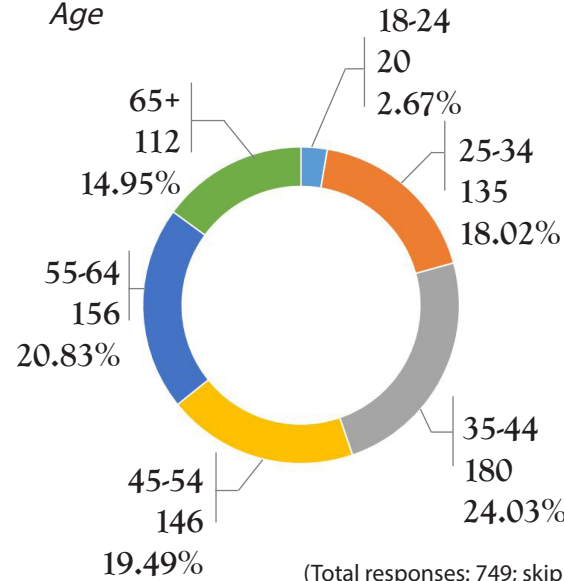


774 TOTAL RESPONDENTS

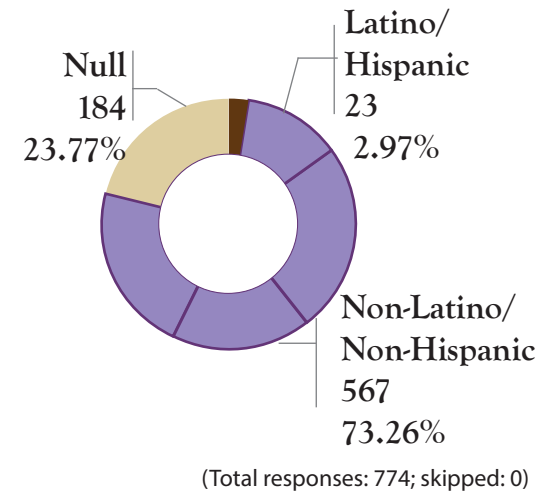
How long have you lived in your current community?



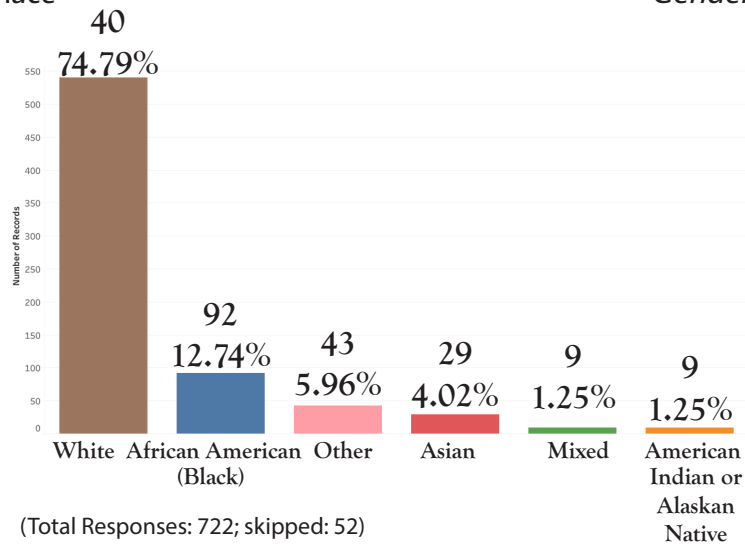
Age



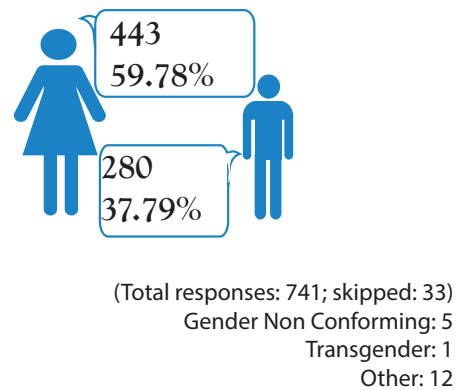
Ethnicity



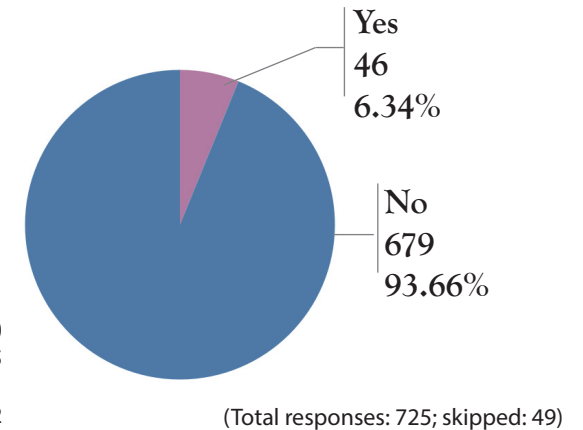
Race



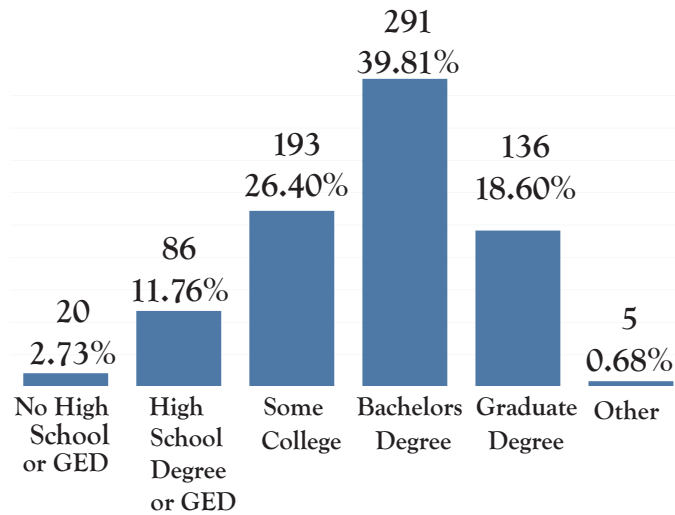
Gender



Do you consider English as your second language?

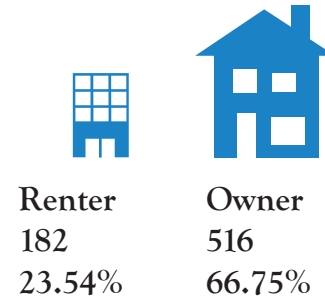


Highest Level of Education



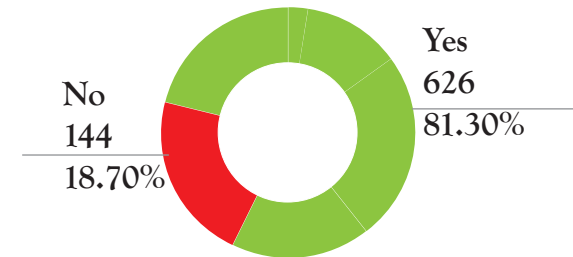
(Total responses: 731; skipped: 43)

Home Ownership



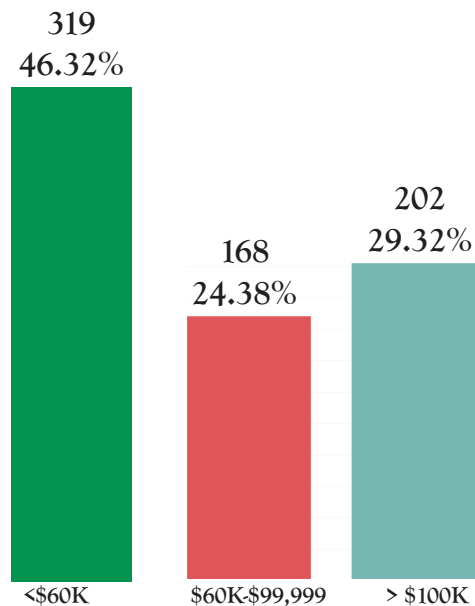
(Total responses: 715; skipped: 59)

Are you able to easily find safe, sanitary, and affordable housing in your community?



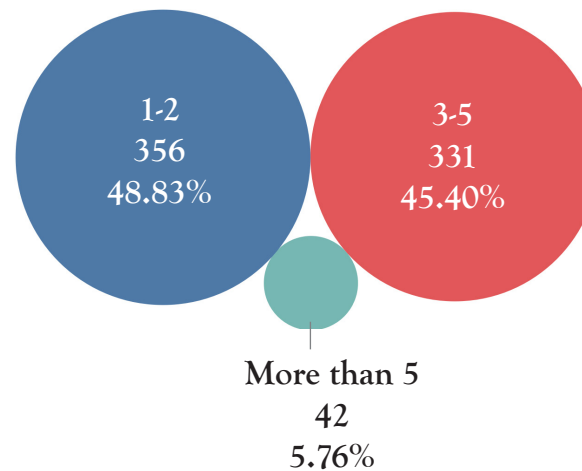
(Total responses: 770; skipped: 4)

Household Income



(Total responses: 689; skipped: 85)

Number of People in Household



(Total responses: 729; skipped: 45)

Bloomington respondents are:

- **Long-term residents**
Nearly 70% have lived in the community at least six years or more.
- **Mostly non-Hispanic white**
- **Predominantly female**
Nearly 60% of respondents were female.
- **25 years or older**
- **Educated**
Nearly 85% had some college or higher level of education.
- **Predominantly homeowners**
- **Small- to medium-size households**
48% were small (1-2) family households, while 45% were medium (3-5) family households.
- **From diverse income levels**

Survey Analysis Methodology



Outreach was conducted regionally across both Bloomington and Normal. This chapter only analyzes responses from survey takers who said they live in Bloomington. These results will inform the City's 2020-2024 Consolidated Plan.

Each question was analyzed in several ways, including cross-tabulation with dimensions such as age, race, and income. Open-ended questions were analyzed by tagging each response based on its content. These tags were then categorized into general themes. Depending on the content of each response, some only had one tag, while others had several in different categories. For example, in the open text response area for the question "Do you believe housing discrimination exists in your community?" an individual answered "Yes, by Race and Income." This answer was tagged into two categories: "Discrimination based on Race" and "Discrimination based on Income."

Note that the survey results are

primarily focused on income. This is because the goal of the Community Development Block Grant (CDBG) is to serve low- to moderate-income households.

The survey requested respondents choose their annual household income from four categories. In an effort to simplify the analysis process, the lower two income categories, under \$30,000 and \$30,000 - \$59,999 were combined into one category, under \$60,000. Respondents with an annual household income under \$60,000 likely meet the US Department of Housing and Urban Development's (HUD) annual income guidelines for CDBG assistance.

A portion of the respondents in the \$60,000- \$99,999 income bracket may also be eligible based on household size and other factors. Therefore, the answers for respondents with an annual income under \$60,000 and between \$60,000 - \$99,999 were analyzed in depth.

Noteworthy results by other dimensions, such as race or education level, are also included in the analysis. The analysis features several tables highlighting the similarities in priorities of the respondents in the income brackets mentioned above. The green areas of each table indicate overlap in the top five priorities.

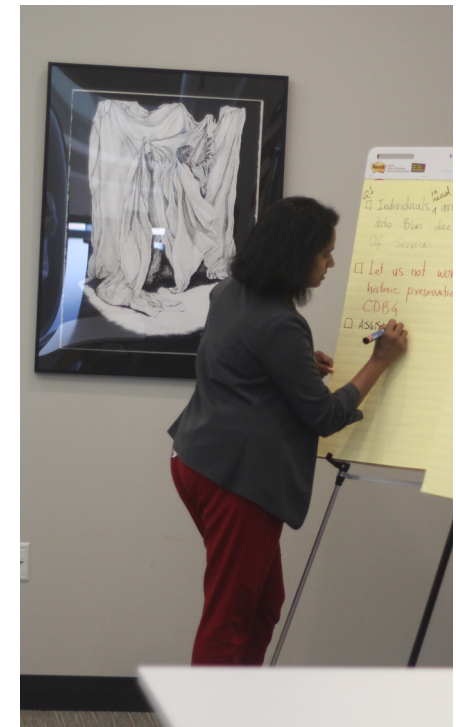
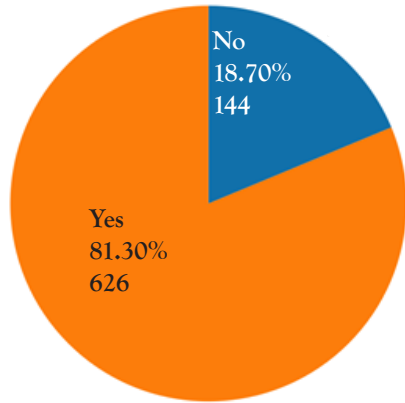


Chart B.1 – Overall Responses for
Bloomington Respondents



Respondents making under \$60,000, African Americans, younger respondents, renters, and those with education below a Bachelor's degree had more difficulty finding safe, sanitary, and affordable housing in Bloomington.

Q. Ability to find safe, sanitary and affordable housing

Respondents were asked the question "Are you able to find safe, sanitary and affordable housing in your community?" About 81% of Bloomington respondents said "Yes" and about 19% of Bloomington respondents said "No."

Chart B.2 shows responses to this question broken down by income bracket. About 31% of respondents in the under \$60,000 annual household

income bracket replied that they are not able to find safe, sanitary, and affordable housing in their community. The two higher income brackets are both well under the 19% overall average.

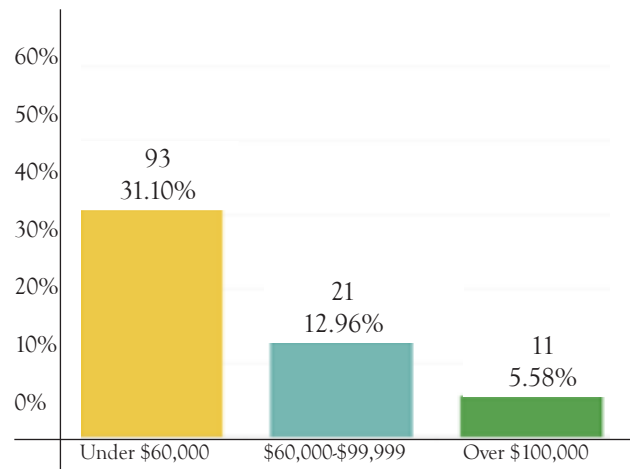
Other Demographics to Note

Among the 19% who said they have difficulty finding safe, sanitary and affordable housing, the following groups responded

at a higher rate than the 19% average:

- African-Americans: 33%
- 18-24 Age Group: 35%
- 25-34 Age Group: 24%
- No High School Diploma: 25%
- Some College Credits Earned: 29%
- Renters: 34%

Chart B.2 – Respondents from Bloomington Who Answered "No" by Income



"I can find safe, and sanitary housing. It's the affordable housing that is lacking. Unless you have perfect credit. Our family goes through great financial sacrifice to live in a safe and sanitary home. Because the affordable housing is NOT safe or sanitary. You can't find all 3 in one."
- Bloomington Resident

Q. Please explain the challenges you have faced in finding safe, sanitary and affordable housing in your community

Respondents were asked to elaborate on the previous question by explaining challenges they have faced in finding safe, sanitary and affordable housing in their community. The responses to those questions were tagged by key words, and the top tagged key words are shown in Chart B.3. Each bar on the chart is broken down by income bracket. The top answers to this question were “Affordability,” “Neighborhood/ Safe Area” and “Property

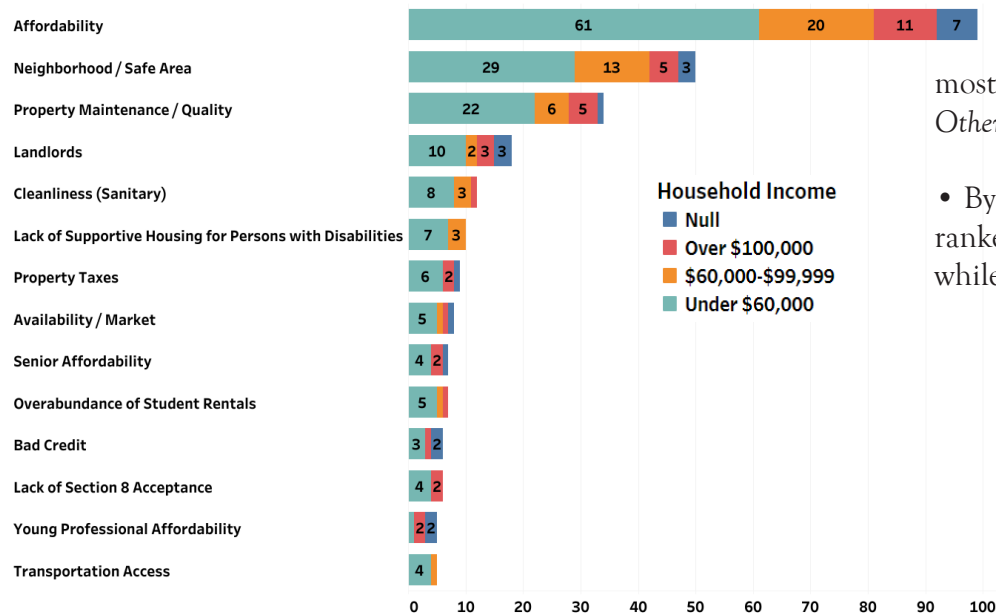
Maintenance/Quality.” Table B.1 to the left shows the top challenges each of the two lowest income brackets (under \$60,000 annual household income and \$60,000-\$99,999 annual household income) have faced in finding safe, sanitary, and affordable housing. Respondents in both of these income brackets indicated they have faced “Affordability,” “Neighborhood/ Safe Area,” “Property Maintenance/Quality” issues the

Table B.1 – Top Responses by Lowest Income Brackets

	Under \$60,000 HH Income	\$60,000 - \$99,999 HH Income
1	Affordability	Affordability
2	Neighborhood / Safe Area	Neighborhood / Safe Area
3	Property Maintenance / Quality	Property Maintenance / Quality
4	Landlords	Cleanliness (Sanitary) (tie for 4 th)
5	Cleanliness (Sanitary)	Lack of Supportive Housing for Persons with Disabilities (tie for 4 th)
6	Lack of Supportive Housing for Persons with Disabilities	Remain in Same School District (tie for 4 th)
7	Property Taxes	Landlords
8	Availability / Market (tie for 8 th)	--
9	Overabundance of Student Rentals Makes Other Housing Unaffordable (tie for 8 th)	--

Note: Green indicates overlapping priorities between the two income brackets.

Chart B.3- Responses for Bloomington Respondents by Income Bracket



most when looking for housing.
Other Demographics to Note

- By Housing Tenure: Owners ranked “Property Taxes” third, while renters ranked it tenth.

“We need to do better and realize low income is not a bad personality trait, nor does it define the respect or safe housing and services a person deserves.”
-Bloomington Resident

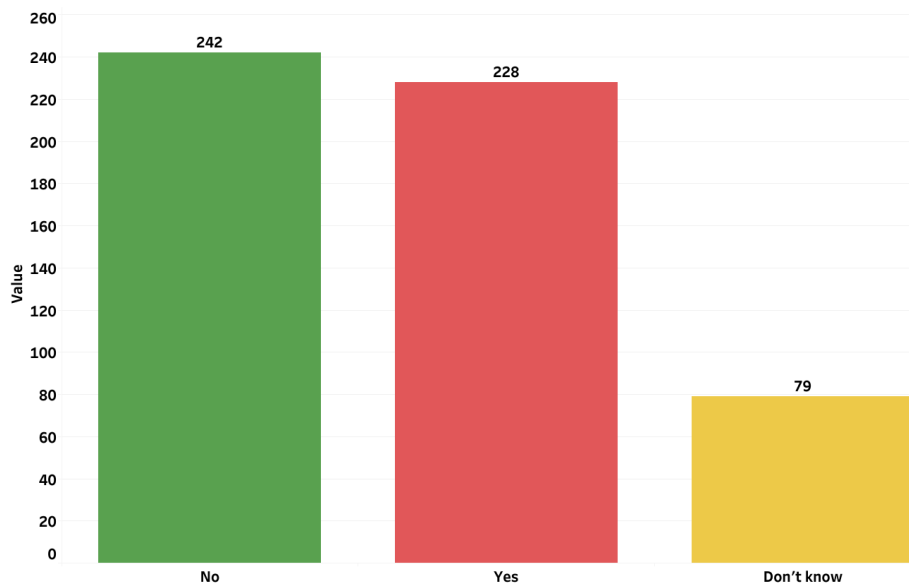
“Affordability,” followed by “Neighborhood /Safe Area” and “Property Maintenance/Quality” were the top priorities overall and for both income groups.

Q. Do you believe housing discrimination exists in your community?

Respondents were asked “Do you believe housing discrimination exists in your community?” Chart B.4 shows the overall responses. Overall, 242 (about 31%) said “No,” 228 (about 29%) said “Yes,” 79 (about 10%) replied “Don’t know,” and the rest did not reply.

Chart B.5 shows responses broken down by income bracket. Notice that as income goes up, the response dynamics change. The under \$60,000 bracket

Chart B.4 - Overall Responses for Bloomington Respondents



ranks “Yes” higher than “No,” whereas the over \$100,000 bracket ranks “No” higher than “Yes.” This is an indication that those in low-income brackets possibly experience more housing discrimination.

Other Demographics to Note

- By Race: African Americans ranked “Yes” (42) much higher than “No” (14).
- By Age: 18-24 and 25-34 age groups ranked “Yes” (8 and

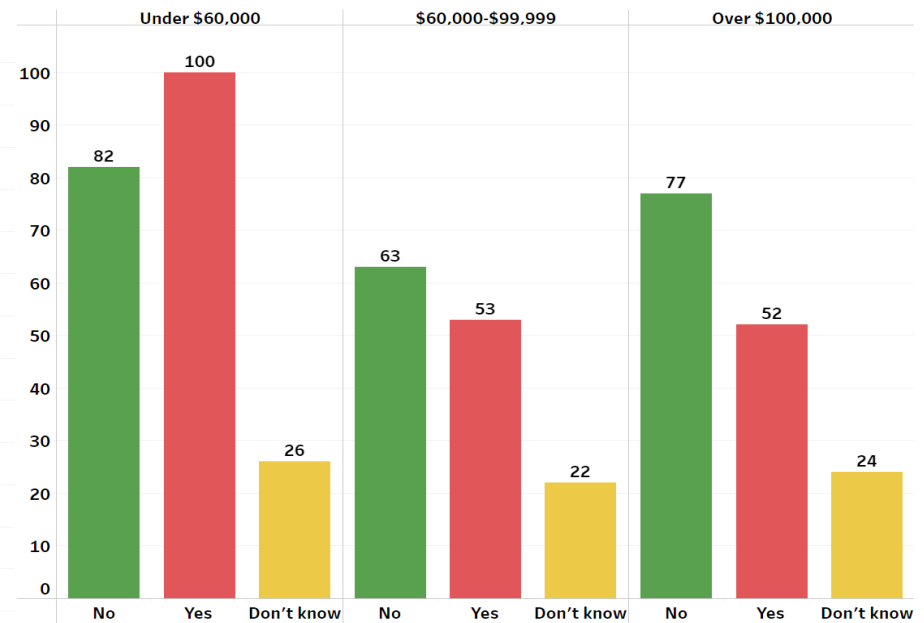
44, respectively) higher than “No” (4 and 30, respectively); all other age groups ranked “No” much higher than “Yes.”

- By Gender: Females marked “Yes” much higher (141 “Yes,” 102 “No”), but males marked “no” much higher (76 “Yes,” 121 “no”).
- By Housing Tenure: Owners marked “No” much higher.
- By Housing Tenure: Owners marked “No” much higher (184 “No”, 145 “Yes”), but

renters marked “Yes” higher (44 “No,” 62 “Yes”).

“While I’m not aware of instances of flagrant discrimination, I have to assume that it exists given the housing segregation there seems to be throughout Bloomington and Normal.”
-Bloomington Resident

Chart B.5 - Responses for Bloomington Respondents by Income Level



Q. Please explain how you feel housing discrimination exists in your community

Respondents were asked to elaborate further on what types of discrimination they have faced or believe exists in the community. The responses were tagged by key words, and the top tagged key words are shown in the graph. Overall, the top answers to this question were “Income Based Discrimination,” followed by “Discrimination Against Minority Groups” and “Possibly Exists, but Have Not Personally Experienced It.”

By Income

Table B.2 shows the top five types of housing discrimination that the two lowest income brackets (under \$60,000 and \$60,000-\$99,999) have faced. Four out of the top five issues overlap between both income brackets.

Interestingly, while “Income Based Discrimination” was the overall top response, it is not the

Table B.2 – Top Responses by Lowest Income Brackets

	Under \$60,000 HH Income	\$60,000 - \$99,999 HH Income
1	Discrimination Against Minority Groups	Discrimination Against Minority Groups
2	Income Based Discrimination	Possibly Exists, but Have not Personally Experienced It.
3	Discrimination Based on Background (credit, previous evictions, criminal history)	Income Based Discrimination
4	Possibly Exists, but Have not Personally Experienced It.	Discrimination Issues with Landlords / Realtors (tie for 4 th)
5	Low Income Neighborhoods Have Fewer Services / Worse Infrastructure / Lower Quality Housing	Low Income Neighborhoods Have Fewer Services / Worse Infrastructure / Lower Quality Housing (tie for 4 th)

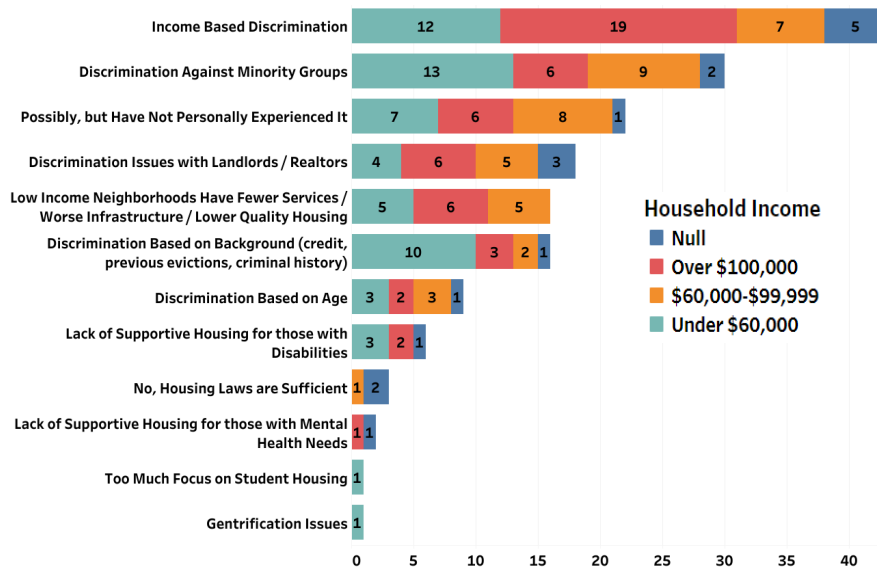
Note: Green indicates overlapping priorities between the two income brackets.

top response for either of these two income brackets. Another item to note is that the under \$60,000 bracket ranked “Discrimination Based on Background” much higher than all other income brackets. “Background” denotes credit history, previous evictions and criminal history.

Other Demographics to Note

- By Race: African Americans ranked “Discrimination Based on Background” and “Discrimination Issues with Landlords/Realtors” highest, when those ranked in the middle on the overall responses graph.
- By Education: Graduate Degree or Higher ranked “Discrimination Against Minority Groups” higher than other groups.

Chart B.6 – Responses for Bloomington Respondents by Income Bracket



Background
Minority
Landlords/Realtors
Income Based
Age Based
Possibly
Fewer Services

Q. What type of public facilities would you like to see added or expanded in your community?

Respondents were given a list of public facilities eligible under CDBG guidelines and asked to check all answers that apply to the following question: “What type of public facilities would you like to see added or expanded in your community?” The top answer was by far “Street/Sidewalk Improvements.” The second most checked category was “Homeless Facilities” followed by “Water/Sewer Improvements.”

By Income

“Street/Sidewalk Improvements,” “Homeless Facilities” and “Public Parks and Gathering Spaces” all ranked within the top five priority areas for respondents with an income under \$100,000.

Notable differences include the following:

- The under \$60,000 bracket ranked “Community Centers” and “Recreation Centers” highly, whereas those two categories ranked sixth

Chart B.7 – Responses for Bloomington Respondents by Income Bracket

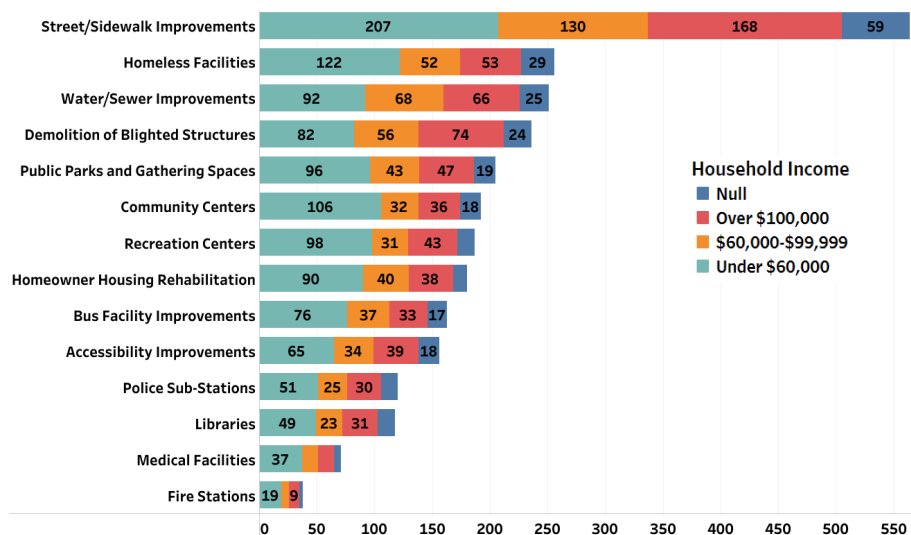


Table B.3 – Top Responses by Lowest Income Brackets

	Under \$60,000 HH Income	\$60,000 - \$99,999 HH Income
1	Street/Sidewalk Improvements	Street/Sidewalk Improvements
2	Homeless Facilities	Water/Sewer Improvements
3	Community Centers	Demolition of Blighted Structures
4	Recreation Centers	Homeless Facilities
5	Public Parks and Gathering Spaces	Public Parks and Gathering Spaces
6	Water/Sewer Improvements	Homeowner Housing Rehabilitation
7	Homeowner Housing Rehabilitation	Bus Facility Improvements
8	Demolition of Blighted Structures	Accessibility Improvements
9	Bus Facility Improvements	Community Centers
10	Accessibility Improvements	Recreation Centers

Note: Green indicates overlapping priorities between the two income brackets.

- and seventh in the overall rankings.
- “Community Centers” and “Recreation Centers” ranked ninth and tenth for the \$60,000- \$99,999 bracket.
- The \$60,000- \$99,999 bracket ranked “Water/Sewer Improvements” and “Demolition of Blighted Structures” higher than the under \$60,000 bracket, possibly a sign that bracket has more homeowners than the lower bracket.
- “Street/Sidewalk Improvements” came in second for African Americans (first overall.)
- By Age: 45-54, 55-64 and 65+ ranked “Demolition of Blighted Structures” highly, possibly due to higher homeownership rates in these age groups.
- By Gender: Females ranked “Recreation Centers” third, whereas it ranked seventh overall.
- By Housing Tenure: Renters generally ranked infrastructure improvements (“Street/Sidewalk,” “Water/Sewer, Demolitions”) lower than owners.
- By Race: African Americans ranked “Community Centers” as their top public facility, while it ranked sixth overall.

Other Demographics to Note

Q. What type of public services would you like to see added or expanded in your community?

Respondents were given a list of public services and asked to check all answers that apply to the following question: “What type of public services would you like to see added or expanded in your community?” The top answer was “Health Services.” The second most checked category was “Mental Health Services,” followed by “Crime Prevention/Awareness.” Chart B.8 shows the overall responses.

By Income

Table B.4 shows the top ten priorities for public services by the two lowest income brackets. All five of the top priorities match, with the top two for both being “Health Services” and “Mental Health Services.” Notable differences include:

- The under \$60,000 bracket ranked “Disability Services” sixth, which was higher than other brackets.
- The under \$60,000 bracket had a disproportionately high ranking of “Food Services (through pantries)”.

Other Demographics to Note

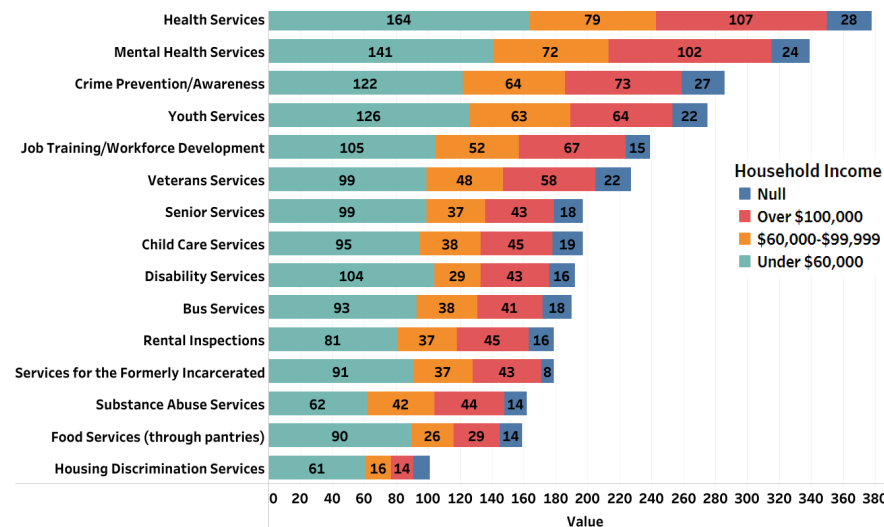
- African Americans ranked “Child Care Services” third and renters ranked it fourth, but “Child Care Services” was ranked eighth overall.
- African Americans ranked “Housing Discrimination Services” and “Food Services” higher than they were ranked overall, but ranked “Senior Services” and “Veterans Services” much lower than they appeared in the overall rankings.

Table B.4 – Top Responses by Lowest Income Brackets

Under \$60,000 HH Income	\$60,000 - \$99,999 HH Income
Health Services	Health Services
Mental Health Services	Mental Health Services
Youth Services	Crime Prevention / Awareness
Crime Prevention / Awareness	Youth Services
Job Training / Workforce Development	Job Training / Workforce Development
Disability Services	Veterans Services
Veterans Services (tie for 7 th)	Substance Abuse Services
Senior Services (tie for 7 th)	Child Care Services (tie for 8 th)
Child Care Services	Bus Services (tie for 8 th)
Services for the Formerly Incarcerated	Senior Services (tie for 9 th)
	Services for the Formerly Incarcerated (tie for 9 th)
	Rental Inspections (tie for 9 th)

Note: Green indicates overlapping priorities between the two income brackets.

Chart B.8 – Responses for Bloomington Respondents by Income Bracket



Among survey respondents, renters and African Americans ranked “Child Care Services” higher than the overall population of Bloomington.

Q. What type of assistance will help expand job and economic opportunities for low- to moderate-income residents in your community?

Respondents were asked the open-ended question: “What type of assistance will help expand job and economic opportunities for low- to moderate-income residents in your community?” The responses were tagged and the top tagged keywords are shown in Chart B.9.

The top tagged three tagged responses were “Job Training,” “Apprenticeships / Internships,” and “Business Support.”

By Income

As shown in Table B.5, four out of the top five priorities for both these income brackets match: “Job Training,” “Business Support,” “Apprenticeships/ Internships,” and “Job Application and Soft Skills Coaching.” An item of note is that the under \$60,000 bracket ranked “Affordable, Quality Housing” fifth, whereas it appears ninth in the overall results and tenth for the \$60,000- \$99,999 bracket.

Other Demographics to Note

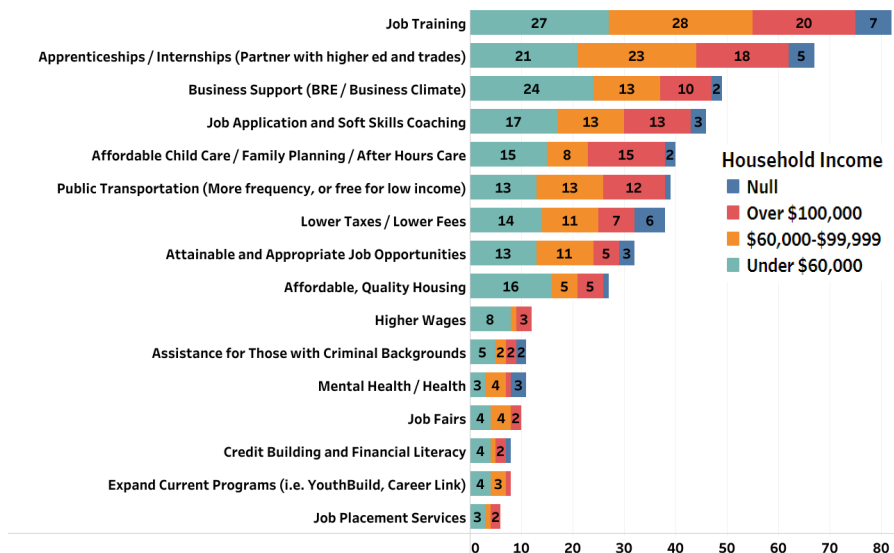
African Americans ranked “Business Support” first, whereas it comes in third in the overall results.

Table B.5 – Top Responses by Lowest Income Brackets

	Under \$60,000 HH Income	\$60,000 - \$99,999 HH Income
1	Job Training	Job Training
2	Business Support	Apprenticeships / Internships
3	Apprenticeships / Internships	Business Support (tie for 3 rd)
4	Job Application and Soft Skills Coaching	Job Application and Soft Skills Coaching (tie for 3 rd)
5	Affordable, Quality Housing	Public Transportation (tie for 3 rd)
6	Affordable Child Care / Family Planning / After Hours Care	Lower Taxes / Lower Fees (tie for 6 th)
7	Lower Taxes / Lower Fees	Attainable Job Opportunities (tie for 6 th)
8	Public Transportation (tie for 8 th)	Affordable Child Care / Family Planning / After Hours Care (tie for 8 th)
9	Attainable Job Opportunities (tie for 8 th)	More Outreach / Connecting Individuals to Programs (tie for 8 th)
10	Higher Wages	Affordable, Quality Housing

Note: Green indicates overlapping priorities between the two income brackets.

Chart B.9 – Responses for Bloomington Respondents by Income Bracket



“Access to finance; policy to encourage hiring people with criminal pasts; vocational training and basic business management training. A mentoring program between older business owners and future business owners to encourage retention of local businesses as owners age out of the industry.”
-Bloomington Resident

Q. Are there specific neighborhoods or areas within your community that should be targeted for revitalization or blight removal?

Respondents were asked the open-ended question: “Are there specific neighborhoods or areas within your community that should be targeted for revitalization or blight removal?” The responses were tagged by key words and the top tagged key words are shown in the Chart B.10.

The top responses for Bloomington residents were “Bloomington West Side,” “No,” and “West Market and West Washington Streets.”

By Income

Table B.6 shows the top five neighborhoods or geographic areas ranked by each of the two lowest income brackets. All five of the top priorities match, although not in the exact same order.

Other Demographics to Note

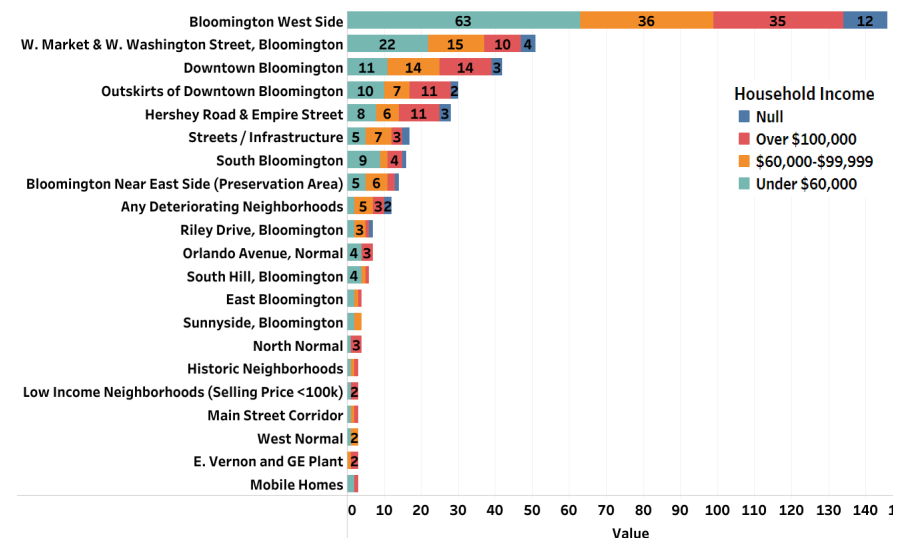
- Owners ranked “Bloomington West Side” first, but renters ranked “No” first.

Table B.6 – Top Responses by Lowest Income Brackets

	Under \$60,000 HH Income	\$60,000 - \$99,999 HH Income
1	Bloomington West Side	Bloomington West Side
2	No	West Market & West Washington Streets
3	West Market & West Washington Streets	Downtown Bloomington
4	Downtown Bloomington	No
5	Outskirts of Downtown Bloomington	Outskirts of Downtown Bloomington (tie for 5 th)
6	South Bloomington	Streets / Infrastructure (tie for 5 th)
7	Hershey Road & Empire Street	Hershey Road & Empire Street (tie for 7 th)
8	Streets / Infrastructure (tie for 8 th)	Bloomington Near East Side (tie for 7 th)
9	Bloomington Near East Side (tie for 8 th)	Any Deteriorating Neighborhoods
10	Orlando Avenue, Normal (tie for 10 th)	Riley Drive, Bloomington
	South Hill, Bloomington (tie for 10 th)	---

Note: Green indicates overlapping priorities between the two income brackets.

Chart B.10 – Responses for Bloomington Respondents by Income Bracket



Respondents with incomes under \$60,000 and respondents who rent each ranked that there were “No [specific neighborhoods that should be targeted]” higher than those in the \$60,000 and above income brackets.

Public Meeting ~ Resource Allocation Exercise

After the survey period ended, MCRPC and City of Bloomington staff held a public meeting that was open to all residents to supplement the findings of the survey. During the public meeting, staff coordinated a resource allocation activity. Each attendee was given stickers representing available CDBG funds. Attendees were asked to allocate funds to public services and public facilities based on what they determined to be the most important and the best use of CDBG funds. Those public services and public facilities were then ranked based on the total amount allocated. Charts B.11 and B.12 (next page) show the results of the resource allocation activity. The total amount allocated was converted into percentages, to show the percent of total funds allocated to that particular item. These percentages are an indication of the importance of that service or facility to the attendees.

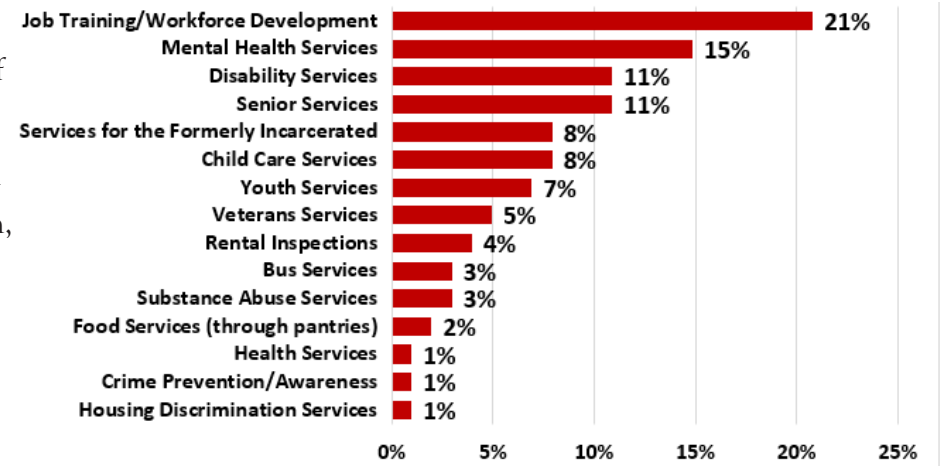
Public Services

The Department of Housing and Urban Development (HUD) puts a 15% cap on the amount of CDBG dollars that can be used for public services. For example, if HUD allocated \$100 in CDBG funds to the City of Bloomington, up to \$15 could be used for public services. It is important to keep that in mind when looking at the resource allocations in Chart B.11. For example, in keeping with our \$100 example, if the City of Bloomington were only able to use \$15 for public services, chart B.11 tells us that 21% of the \$15 should be used toward job training/workforce development.

Attendees at the public meeting ranked “Job Training/Workforce Development,” “Mental Health Services,” and “Disability Services” as their top three public services.

The resource allocation activity provided an opportunity for residents to expand on survey

Chart B.11 - Percentage of Public Services Funds Allocated to Each Service Type



results. Staff utilized rankings from both the survey and the resource allocation exercise conducted at the public meeting. Table B.7 shows the overlap and discrepancies in the top five rankings between survey respondents and public meeting attendees. Green shows the overlap in answers. Two out of the top five overlap: “Job Training/Workforce Development” and “Mental Health Services.”

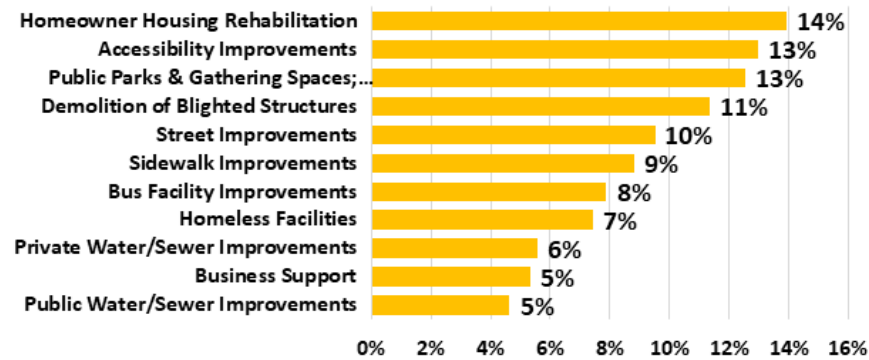
Public Facilities

Unlike public services, HUD does not put a cap on the percentage of CDBG dollars that can be used for public facilities. Generally, public facilities fall more directly into the purview of the purpose of CDBG, which is to provide safe, sanitary,

affordable, and decent housing. Attendees at the public meeting ranked “Homeowner Housing Rehabilitation,” “Accessibility Improvements,” and “Public Parks & Gathering Spaces, Community Centers, and Recreation Centers” as their top three public services.

Survey takers were not asked to allocate resources, but rather were asked to check all public facilities they would like to see added or expanded in their community. Staff was able to determine rankings from both the survey question and from the resource allocation exercise. The interactive environment of the public meeting allowed staff the opportunity to provide attendees additional information related to public facility eligibility and discuss other possible funding

Chart B.12 Percentage of Public Facilities Funds Allocated to Each Facility Type



sources. Based on feedback received about the survey design, it was determined that some of the categories from the survey should be combined or separated. The following changes were made to the question for the public meeting:

- “Street/Sidewalk Improvements” was separated into two separate categories.
- “Water/Sewer Improvements” was separated into “Public Water/Sewer Improvements” and “Private Water/Sewer Improvements.”
- “Public Parks and Gathering Spaces” was combined with “Community Centers” and “Recreation Centers” into one category.

- “Libraries,” “Police Sub-Stations,” “Medical Facilities,” and “Fire Stations” were omitted from the exercise to keep the exercise more manageable, since they ranked last on the survey question.

Table B.7 – Overlap in public service priorities, based on Bloomington survey responses and Bloomington public meeting

	Survey Responses	Public Meeting Responses
1	Health Services	Job Training/Workforce Development
2	Mental Health Services	Mental Health Services
3	Crime Prevention/Awareness	Disability Services
4	Youth Services	Senior Services
5	Job Training/Workforce Development	Services for the Formerly Incarcerated (tie for 5 th)
	--	Child Care Services (tie for 5 th)

Note: Green indicates overlapping priorities between the two groups of respondents.

Table B.8, found on page 15, shows the overlap and discrepancies in the top five rankings between what survey takers responded and what public meeting attendees responded for public facilities. Green shows the overlap in answers. The following priorities overlapped: “Street Improvements,” “Demolition of Blighted Structures,” and “Public Parks & Gathering Spaces; Community Centers; Recreation Centers.”

Note that while the combined group of “Public Parks & Gathering Spaces; Community Centers; Recreation Centers” ranked third in the public meeting, the separated categories had the following rankings in the survey analysis:

- “Public Parks & Gathering Spaces”: Fifth
- “Community Centers”: Sixth
- Recreation Centers”: Seventh

Discussion

While the resource allocation activity was an important part of the feedback gathered at the public meeting, the discussion that followed allowed attendees to

explain their choices further. The following topics were addressed during the discussion:

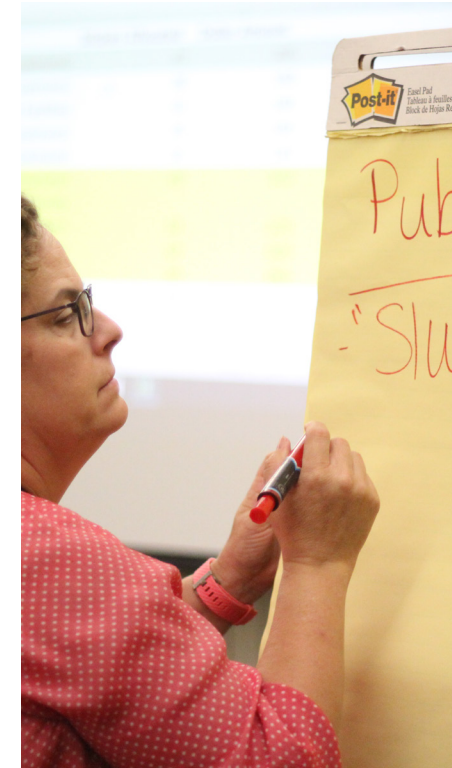
- Job training is needed for youth and should be for living-wage jobs.
- Types of job training should match jobs that are available locally.
- Mental health needs should be addressed with wrap-around services; specific emphasis on mental health needs for youth and LGBTQ youth.
- Seniors and persons living with disabilities are in need of services to help them stay independent, such as assistance preparing meals and cleaning.

- The state of some rental housing is terrible and landlords need to be held accountable.
- While a few attendees voiced support for using CDBG funds for street resurfacing, others were adamant that CDBG funds should not be used for any street improvements. Most felt the City should use its motor fuel tax revenue and other resources to fund street improvements. There was more positive input for using CDBG for sidewalk improvements especially for accessibility improvements.

Table B.8 – Overlap in public facility priorities, based on Bloomington survey responses and Bloomington public meeting.

	Survey Responses	Public Meeting Responses
1	Street/Sidewalk Improvements	Homeowner Housing Rehabilitation
2	Homeless Facilities	Accessibility Improvements
3	Water/Sewer Improvements	Public Parks & Gathering Spaces; Community Centers; Recreation Centers
4	Demolition of Blighted Structures	Demolition of Blighted Structures
5	Public Parks & Gathering Spaces	Street Improvements

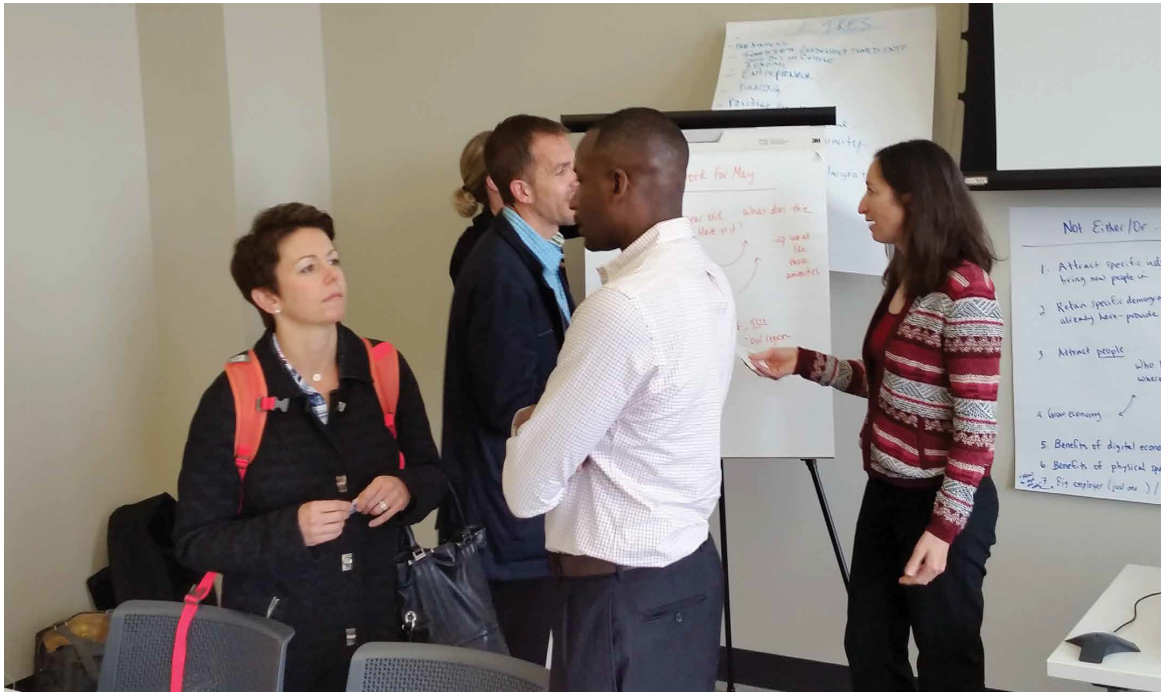
Note: Green indicates overlapping priorities between the two groups of respondents.





NOVEMBER 2018





PURPOSE

The City of Bloomington and Town of Normal receive annual entitlement funding from the U.S. Department of Housing and Urban Development (HUD). The City and Town are required by law to adopt a detailed Citizen Participation Plan containing policies and procedures for stakeholder consultation and public involvement in the Consolidated Plan process and the use of Community Development Block Grant (CDBG) funds.

The City of Bloomington and Town of Normal, herein after referred to as the Entitlement Communities, are committed to increasing public participation and the empowerment of residents—especially those of low- and moderate-income—to shape the future of the region.

The Citizen Participation Plan will be made available to the public via the Entitlement Community's website and physical office locations.

Funding Source

The Community Development Block Grant (CDBG) Entitlement Program provides annual grants on a formula basis to entitled cities and counties to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons. The program is authorized under Title 1 of the Housing and Community Development Act of 1974, Public Law 93-383, as amended; 42 U.S.C.-530.1 et seq.¹

Regulatory Requirements

This Citizen Participation Plan has been developed in accordance with the applicable federal regulation of 24 CFR Part 91.05: Citizen Participation Plan; Local Governments.

Advisory Body

The Regional Housing Advisory Committee of McLean County was established in April 2018 to address housing issues regionally and comprehensively for people of all ages, incomes and abilities. Three subcommittees comprise the Committee, addressing distinct yet related housing issues in the community. Those issues include increasing the inventory of safe, high quality, affordable and supportive housing particularly to lower income groups, seniors and persons with disabilities.

The Intergovernmental Staff Committee is responsible for determining the priorities and policies of the Regional Housing Advisory Committee with input from group membership, carrying out the activities of the Advisory Body and acting as the conduit between local housing efforts and state and federal housing agencies. Under McLean County Regional Planning Commission (MCRPC) leadership, the staff committee will prepare a regional Consolidated Plan for the Bloomington and Normal CDBG programs. Committee members represent the following organizations that evaluate and implement the recommendations of the advisory groups:

- McLean County Regional Planning Commission
- City of Bloomington
- Town of Normal
- Bloomington Housing Authority
- Providing Access to Help (PATH)
- McLean County Behavioral Health Coordinating Council

The Committee will coordinate its work with the projects and priorities established in the Consolidated Plan.

Outreach and Citizen Engagement Strategy

This Citizen Participation Plan defines a process for meaningful public input regarding CDBG-funded activities and priorities. Two common threads run through this public outreach approach, 1) to move the Entitlement Communities' work into the places and spaces where people gather, work and learn, and 2) to cooperate with our participants and partners in development of a network of contacts that can substantially expand our outreach capabilities.

The Entitlement Communities will provide for and encourage genuine involvement by low- and moderate-income residents at all stages of the process, including: identifying needs; setting priorities among these needs; deciding how much money should be allocated to each high-priority need; suggesting the types of programs to meet high-priority needs; and overseeing the way in which the programs are carried out.

¹ www.hudexchange.info/programs/cdbg-entitlement

OBJECTIVES FOR ENGAGEMENT

1

Understand the demographics of the Entitlement Community's low- and moderate-income population and determine what cultural, economic, language-based or accessibility barriers exist to public participation.

2

Seek broad citizen input with specific emphasis on participation by low- and moderate- income persons and by those living in areas where federal funds are proposed to be used, and/or on low- and moderate-income neighborhoods. Low- and moderate-income neighborhoods are areas where at least 51% of households have incomes at or below 80% of the area median income (AMI).

3

Hold public meetings, events, or activities in locations that are accessible to all area stakeholders and members of the community, including but not limited to members of ethnic, racial, or faith-based minority groups, people with limited economic resources, people with disabilities, people of any age or educational attainment, and people with limited proficiency in understanding or speaking English.

4

Consult with local and regional institutions including Continuums of Care, businesses, nonprofit organizations, philanthropic organizations, and community- and faith-based organizations. Consultations will also include broadband internet service providers, organizations engaged in narrowing the digital divide, agencies whose primary responsibilities include the management of flood prone areas, public land or water resources, and emergency management agencies.

5

Include the Public Housing Authority (PHA) in planning for programs and projects related to its developments so that the PHA can make this information available at the annual hearing for the PHA plan.

6

Encourage, in conjunction with the PHA, the participation of residents of public and assisted housing developments along with other low-income residents of targeted revitalization areas in which the developments are located.

7

Provide methods for two-way communication, information and input from populations and persons who are less likely to attend meetings.

8

Convey the information in various formats to reach all stakeholder groups to the extent possible, using direct and network-based means of communication.

Opportunities for Participation

Each of the Entitlement Communities will solicit input from residents and stakeholders at public hearings held at least twice annually on programming and operations.

In addition to a minimum of two public hearings, the following outreach/engagement processes may be utilized:

- Public meetings
- Open houses
- Focus groups
- Surveys
- Innovative tools and technologies to gather input from various demographic groups
- Personal outreach by staff
- Services for persons with disabilities*

* Notices of opportunities for public involvement include contact information for people needing any form of accommodations.



Outreach Parameters

Identification of Stakeholders

The term stakeholder refers to “an individual, group, or organization, who may affect, be affected by, or perceive itself to be affected by a decision, activity, or outcome of a project.”² Stakeholders of Community Development Block Grant (CDBG) activities include but are not limited to the following:

- Board of Directors/Trustees, etc.—the governing board of an affected agency or other entity
- Local and regional jurisdictions and other government stakeholders
- Low- and moderate-income persons, and those living in low- to moderate-income neighborhoods
- Minorities and non-English speaking persons
- Persons with disabilities
- Partner agencies
- Continuum of Care and non-profits
- Behavioral Health Council and wellness community
- Bloomington Housing Authority
- Businesses, community- and faith-based organizations
- Broadband Internet service providers and agencies engaged in narrowing the digital divide
- Agencies whose primary responsibilities include the management of flood prone areas, public land or water resources, emergency management and transportation planning and programming

A stakeholder is "an individual, group, or organization, who may affect, be affected by, or perceive itself to be affected by a decision, activity, or outcome of a project."²

² Project Management Institute, 2013

Strategic Plans

There shall be advanced public notice and reasonable opportunity to comment on the proposed Annual Action Plan, Five-Year Consolidated Plan, Analysis of Impediments to Fair Housing and any Substantial Amendments as applicable.

Public Comment/Public Hearing Process

The entitlement communities shall utilize public comment periods and public hearings to solicit meaningful citizen involvement in the development of the aforementioned strategic plans.

The published comment period pertaining to the Annual Action Plan, Consolidated Plan and Substantial Amendments shall be a minimum of 30 days. During this time, the public will have the opportunity to submit comments orally, in writing or via electronic methods as directed in the notice. Draft copies of the documents will be available via the same channels mentioned above. In addition, a hard copy of the draft documents will be maintained at the Entitlement Community's offices and made available for public review as requested. A reasonable number of free copies of the draft documents will also be provided to those residents and groups upon request. The draft documents will be made available in a form accessible to persons with disabilities, upon request.

The Entitlement Communities will also make available the amount of assistance they are expected to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low and moderate income, prior to the hearing for the Consolidated Plan and Annual Action Plans.

Prior to or concurrent with the public comment period for each Strategic Plan, public hearings will occur. A formal notice of a public hearing will be published in at least one local newspaper with general daily circulation at least two (2) weeks in advance. The same notice will be published to the Entitlement Community's website, newsletters and social media. The notice will also be sent to known stakeholder groups and partner organizations to further publicize via linkage to their respective websites, newsletters and social media.

Each entitlement community will conduct a minimum of two public hearings per year. Together the hearings will cover community development and housing needs, development of proposed activities and a review of program performance. One public hearing will focus on community development and housing needs and the proposed CDBG activities for the coming fiscal year. A second public hearing shall focus on the past year's program performance (Consolidated Annual Performance Evaluation Report). Each of those hearings will be held in their respective entitlement community. At least one hearing will be held in each Entitlement Community before the Consolidated Plan is published for comment. All public hearings will be held at locations accessible to people with disabilities, and provisions will be made for people with disabilities when requests are made at least five working days prior to a hearing. Translators will be provided for people who do not speak English or are hearing disabled, when requests are made at least five working days prior to a hearing. Public hearings will be held at locations and times that are convenient and accessible to potential or actual beneficiaries. (Meeting times are generally held after 5:00 p.m.; however, times may be varied, dependent upon the "targeted" audience.)

A summary of comments received, identifying the comment source and content, as well as the Entitlement Community's responses (including those comments or views not accepted and the reasons therefor will be included in the final document submittal to HUD as required.

Consolidated Annual Performance and Evaluation Report (CAPER)

Within 90 days of the close of each program year, the Entitlement Communities must send to the Department of Housing and Urban Development (HUD) a Consolidated Annual Performance and Evaluation Report (CAPER).

Each CAPER will include the amount of assistance the Entitlement Community actually received (including grant funds and program income) and the range of activities that were undertaken, including the actual amount that benefited persons of low- and moderate-income where applicable.

The Entitlement Communities will give reasonable notice that a CAPER is available for public review and comment.

A notice of availability of draft copies of the document will be published via the same methods described in the 'Public Hearing Process'. The published comment period for the CAPER shall be a minimum of 15 days. There will be a public hearing regarding the Consolidated Annual Performance and Evaluation Report. A formal notice of a public hearing will be published in at least one local newspaper with general daily circulation at least two (2) weeks in advance. The same notice will be published to the Entitlement Community's website, newsletters and social media. The notice will also be sent to known stakeholder groups and partner organizations to further publicize via linkage to their respective websites, newsletters and social media.

In preparing a Consolidated Annual Performance and Evaluation Report for submission to HUD, careful consideration will be given to all comments and views expressed by the public, whether given as verbal testimony at the public hearing or submitted in writing. The CAPER sent to HUD will have a section that presents all comments, plus explanations why any comments were not accepted.

Amendments

The Entitlement Communities will make all Substantial Amendments available for public review and comment.

A Substantial Amendment shall be required if any one of the following criteria applies:

1. A change in the use of CDBG money from one activity to another, in excess of \$100,000.00.
2. Activities proposed to be added or deleted from the plan.
3. A change in the purpose, scope, location, or type of beneficiaries of an activity.
4. A change in priorities for allocating funds.

In case of a Substantial Amendment, the same notification, comment and hearing processes as previously outlined above will be followed.

In preparing a final Substantial Amendment, careful consideration will be given to all comments and views expressed by the public, whether given as verbal testimony at the public hearing or submitted in writing during the review and comment period. The final Substantial Amendment will have a section that presents all comments, plus explanations why any comments were not accepted.

Minimizing Displacement

The Entitlement Communities will work to minimize all displacement of persons and businesses where feasible. In instances where temporary or permanent displacement is necessary, the Entitlement Communities will provide technical and monetary assistance for relocation purposes as required and cost eligible under the applicable federal regulations.

Access to Records

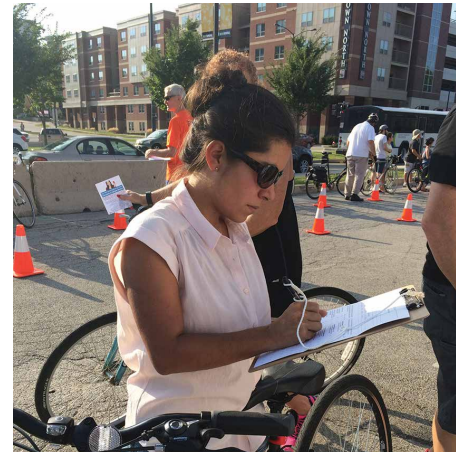
It is the Entitlement Community's intention to provide reasonable and timely access to information and records relating to the proposed and actual use of CDBG funds. Records on past usage of CDBG funds will be maintained for the previous five plan years.

Technical Assistance

Reasonable levels of technical assistance shall be provided to any resident or group seeking information about program eligibility and requirements. Such assistance shall include help with any program application process. The provision of funding is not considered a reasonable level of technical assistance.

Complaints

The applicable Entitlement Community will provide a timely, substantive written response to every written complaint within 15 business days.



In partnership with:

