

JOLIET

2011 ACTION PLAN

37th Year of Community Development Block Grant Program
18th Year of HOME Investment Partnership Program

(Annual Update of the Consolidated Plan)

Prepared by the

City of Joliet

Community and Economic Development Department
Neighborhood Services Division



willfindhousing.org

The affordable housing search resource for the communities of Will County, IL

TABLE OF CONTENTS

	Page
Executive Summary	3
Table 3A Summary of Specific Annual Objectives	5
Consultations and Citizen Participation	7
Resources	8
Federal Resources	8
State Resources	9
Local Resources	10
Activities to be Undertaken	11
Geographic Distribution	15
Homelessness and Other Special Needs Activities	17
Other Actions	18
Obstacles to Addressing Underserved Needs	18
Foster and Maintain Affordable Housing	19
Removal of Barriers to Affordable Housing	20
Evaluate and Reduce Lead based Paint Hazards	21
Reduce the Number of Poverty Level Families	22
Institutional Structure	22
Coordination	23
Public Housing	23
Program Specific Requirements	27
HOME Recapture Requirements	28
HOME Affirmative Marketing Requirements	28
Home Program Matching Requirements	29
Monitoring	29
Contract Requirements	29
HOME On-site Inspections	31
Minority Business Outreach	31
Substantial Amendments	33
Appendix A - Will County Continuum of Care Annual Open Meeting Information	
Appendix B – Unity CDC Newsletter	
Appendix C – Public Hearing Mailing List	
Appendix D – Public Hearing PowerPoint Slides	
Appendix E – Table 3B-Annual Housing Completion Goals	
Appendix F – Table 3C-Listing of Proposed Projects	
Appendix G – Certifications	

EXECUTIVE SUMMARY 2011

The **2011 Action Plan** details the activities for meeting the housing and community development needs identified in the **2010 Consolidated Plan** to be funded with Community Development Block Grant (CDBG) and HOME funds. **In 2011, the City of Joliet anticipates receiving CDBG funds in the amount of \$897,693.00 as well as HOME funds in the amount of \$427,390.00.** This represents funding for the 37th year CDBG Program and the 18th year HOME Program. The Action Plan was prepared by the City of Joliet, Community and Economic Development Department, with the assistance and input from various local housing, social service and health service providers. Citizen participation was solicited throughout the process and formally done so at public hearing.

In the 2010 Consolidated Plan, the City of Joliet identified the following priority needs and specific objectives to increase housing opportunities for all residents of Joliet and promote stability in declining areas:

Priority Needs & Objectives:

1. Affordable Housing

- a. To increase the supply of decent, safe and affordable housing
- b. To increase the ability of low and moderate-income households to become homeowners
- c. To promote safe, decent and affordable housing through code enforcement

2. Preserving Existing Affordable Housing

- a. Elimination of blighting influences in the neighborhoods through clearance and demolition

3. Public Service

- a. Graffiti Removal from public and private property
- b. Funding of the Neighborhood Newsletter
- c. Homeless Services (*Substantial Amendment*)

4. Public Infrastructure

- a. Infrastructure improvements in low and moderate-income areas

Objectives and Outcomes

Each of the activities to be undertaken in the Consolidated Plan is designed to meet one of two major objectives: decent housing or suitable living environment. In addition to meeting specific objectives, these activities are designed to achieve outcomes which can be categorized under three headings: (1) availability/accessibility, (2) affordability and (3) sustainability. The following table shows the activities to be undertaken in 2011 and the objectives to be met:

OUTCOME CATEGORIES				
Activity	Objective	Availability/ Accessibility	Affordability	Sustainability
Local Homestead Program	Decent Housing		X	
Code Enforcement – Inspections	Suitable Living Environment			X
Code Enforcement – Demolition	Suitable Living Environment			X
Graffiti Removal	Suitable Living Environment			X
Homeless Services (<i>Substantial Amendment</i>)	Suitable Living Environment	X		
Neighborhood Newsletter	Suitable Living Environment			X
Administration and Planning-CDBG	N/A	N/A	N/A	N/A
Infrastructure	Suitable Living Environment			X
CHDO Set-Aside	Decent Housing		X	
Down Payment	Decent Housing		X	
Other HOME Activities	Decent Housing		X	
Administration and Planning-HOME	N/A	N/A	N/A	N/A

Summary of Past Performance

An overview of the activities funded during the first year (2010) of the five year Consolidated Plan shows that the City struggled to meet its goals for providing decent affordable housing through its Local Homestead Program and eliminate slum and blight through Clearance and Demolition of blighted structures. In response, the City has listed one of the last remaining condo properties with a local realtor. The listing of the rehabilitated property with a local realtor allowed the City to reach a broader base of prospective buyers, which has proved successful with the City's Neighborhood Stabilization Program (NSP). The City also applied for and received downpayment assistance through the Illinois Housing Development Authority in order to expand housing opportunities for clients, however these funds will not be available until 2011. The City demolished one property in 2010 as part of an ongoing contract and instead used NSP funds to demolish two other properties.

The remaining activities funded by CDBG include Code Enforcement, Graffiti Removal, Neighborhood Newsletter and Public Infrastructure. Code Enforcement, Graffiti Removal, Neighborhood Newsletter and Public Infrastructure have met and/or exceeded proposed objectives. HOME activities undertaken during this period included solidifying Community Housing Development Organization (CHDO) projects on hold and payout to Cornerstone Services for the construction of a duplex for families where at least one member has a developmental disability.

The City of Joliet has obligated \$3,740,416.13 in Neighborhood Stabilization Program funds by purchasing, rehabilitating and demolishing foreclosures and blighted property.

Since March 2009 the City of Joliet has purchased 11 foreclosures for rehabilitation and sale, 5 for rehabilitation and rent and 7 for landbanking/demolition activities for a total of 23 properties. These foreclosures were purchased at an average discount of 15% of the appraised price. The average purchase and rehabilitation price for all properties for sale and rent was \$193,893.54.

The City also contracted with two consultants in 2010. Mullin and Lonergan and Associates Inc., was engaged for an update of the City’s Analysis of Impediments to Fair Housing Choice. EJP Consulting Group LLC., was hired to study the various alternatives for the preservation, revitalization and redevelopment of the 356 unit multifamily housing development known as Evergreen Terrace.

The following table presents the cumulative accomplishments for the first year of the five year Consolidated Plan:

Table 3A Summary of Specific Annual Objectives

Affordability of Decent Housing (DH-2.1) (2010 LH 1, WCHH 3, DP 5)(2011 LH 1, DP 5)(2012 LH 1, WCHH 3)(2013 LH 1, DP 5)(2014 LH 1) DP success is contingent on IHDA funds							
Specific Annual Objective		Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Completed
DH 2.1	Provide decent, affordable housing for low to moderate income homeowners	CDBG HOME	2010	10, 8	9	0	0%
			2011	10	6		
			2012	10, 8	4		
			2013	10	6		
			2014	10	1		
			MULTI-YEAR GOAL				
Affordability of Decent Housing (DH-2.2) (Cornerstone)							
DH 2.2	Provide decent, affordable housing for rent CHDO	HOME	2010	6	1	0	0%
			2011	6	1		
			2012	6	2		
			2013	6	1		
			2014	6	2		
			MULTI-YEAR GOAL				
Affordability of Decent Housing (DH-2.3) (Development of Rental 9, Liberty Meadows 6 in 2011)							
DH 2.3	Provide decent, affordable housing for rent	HOME	2010	7	2	0	0%
			2011	6, 7	8		
			2012	7	2		
			2013	7	1		
			2014	7	2		
			MULTI-YEAR GOAL				

Sustainability of Suitable Living Environment (SL-3.1)							
Specific Annual Objective		Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Completed
SL 3.1	Creating suitable living environment	CDBG	2010	3 (Code Enforcement)	21,000	21,000	100%
			2011				
			2012				
			2013				
			2014				
			MULTI-YEAR GOAL		105,000	21,000	20%
Sustainability of Suitable Living Environment (SL-3.2)							
SL 3.2	Creating suitable living environment through elimination of slum & blight	CDBG	2010	3 (Clearance/Demo)	10	1	10%
			2011				
			2012		10		
			2013		10		
			2014		10		
			MULTI-YEAR GOAL		50	1	2%
Sustainability of Suitable Living Environment (SL-3.3)							
SL 3.3	Creating suitable living environment	CDBG	2010	2 (graffiti removal)	820	820	100%
			2011				
			2012		820		
			2013		820		
			2014		820		
			MULTI-YEAR GOAL		4,100	820	20%
Sustainability of Suitable Living Environment (SL-3.4)							
SL 3.4	Creating a suitable living environment	CDBG	2010	2 (newsletter)	6,000	14,181	236%
			2011				
			2012		6,000		
			2013		6,000		
			2014		6,000		
			MULTI-YEAR GOAL		30,000	14,181	47%
Sustainability of Suitable Living Environment (SL-3.5)							
SL 3.5	Public Infrastructure	CDBG	2010	1	25	50	200%
			2011				
			2012		25		
			2013		25		
			2014		25		
			MULTI-YEAR GOAL		125	0	40%

Sustainability of Suitable Living Environment (SL-1.1) (<i>Substantial Amendment</i>)							
Specific Annual Objective		Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Completed
SL 1.1	Homeless Services	CDBG	2010	2	Not funded	0	0%
			2011		374		
2012	374						
2013	374						
2014	374						
MULTI-YEAR GOAL					1,496	0	0%

Consultation and Citizen Participation

The City of Joliet staff consults with public and private entities that provide assisted housing, health services and social services through its membership and involvement in community organizations. The City of Joliet is an active participant in the Will County Continuum of Care which includes representatives from local housing, health service, social service and child service agencies. The City is represented on the following committees:

- Leadership Committee: City Councilman and Director of Neighborhood Services
- Housing/Plan to End Homelessness Committee: Director of Neighborhood Services
- Ranking Committee: Director of Neighborhood Services

Additionally, the Neighborhood Services Director serves on the Housing Committee of Unity CDC, which was established as a result of the Quality of Life Task Force, and is a board member of the Will-Grundy Medical Clinic, which serves the uninsured residents of Will and Grundy counties. He is also on the board of The First Tee of Joliet, an organization whose mission is to impact the lives of young people by providing learning facilities and education programs that promote character-development and life-enhancing values through the game of golf. The City also participates in the Accessible City Alliance, a broad-based coalition comprised of community leaders, disability advocates, business and local municipal representatives. The City is represented on this committee by the Director of Neighborhood Services. Meetings are held on a quarterly basis. The Director of Neighborhood Services also serves on the Building Blocks II: Initiative which is a collaborative that is a catalyst bringing together early childhood stakeholders to build, advance and sustain a system of services and supports that ensures that all children in Joliet are ready for school success and able to achieve their full potential.

City engineers also serve on the Hickory Creek Watershed Planning Group, with other representatives of local government. The goals of this newly formed committee include: improve water quality, protect environmentally sensitive areas and habitat, enhance recreational uses, mitigate problem areas, public outreach, education and participation.

The City of Joliet promoted citizen participation for the 2011 Action Plan according to the guidelines stated in the City's Citizen Participation Plan. The following activities were designated and carried out to increase citizen participation:

- A newspaper display ad was printed in the Herald News on October 3, 2010. The ad gave notice of the public hearing held on October 20, 2010 and described proposed activities to be undertaken, resources available and a contact person for further information.
- A mailing, which included the proposed projects for 2011 and public hearing information, was sent to 64 local housing providers, faith-based institutions and interested citizens. The names of those included in the mailing are in **Appendix C**.
- A public hearing was held at City Hall on October 20, 2010 at 6:30 p.m. in the Community and Economic Development Conference Room. A copy of the power point presentation slides is included in **Appendix D**.
- Copies of the Proposed 2011 Annual Action Plan are available at the Joliet Public Library's main location and branch location, the Neighborhood Services Office and the City Clerk's Office throughout the 30-day comment period from October 22, 2010 to November 22, 2010. The Plan was also available to view online at the City of Joliet website, www.cityofjoliet.info.
- A memorandum discussing the 2011 Action Plan and a copy of the Plan will be properly advertised and placed on the agenda of the City Council for approval. Once approved, the 2011 Action Plan will be forwarded to HUD for review and approval on or before December 31, 2010.
- Through Mullin and Lonergan and Associates, the consultant conducting the update to the City of Joliet Analysis of Impediments to Fair Housing Choice, the City conducted two-day stakeholder interviews with staff, local housing authority, very low income housing providers, advocacy organizations, real estate industry leaders, legal aid and local landlord association.

RESOURCES

Federal and non-federal resources are expected to provide funding sources for implementation of the City of Joliet's housing and community development programs in 2011.

A. Federal Resources

Community Development Block Grant Program (CDBG): The City of Joliet anticipates receiving \$897,693.00 in CDBG funds for 2011. The City will allocate CDBG funds for activities that benefit low and moderate-income persons, including downpayment assistance, code enforcement, the elimination of slum and blight through demolition, public service and public infrastructure activities.

HOME Investment Partnership Program: The City of Joliet anticipates utilizing the anticipated 2011 HOME allocation of \$427,390.00 to promote affordable housing for low and moderate income persons. Activities to be undertaken include sponsoring CHDO housing projects and rental rehab/development. Community Housing Development Organizations (CHDOs) are special types of non-profit developers of permanent housing

that are accountable to the low and moderate-income communities they serve. The HOME Program attempts to promote and expand the capacity of the non-profits by setting aside a minimum of 15% of each municipality's HOME allocation for investment in housing owned, sponsored, or developed by CHDOs.

B. State Resources

State Housing Trust Fund: The Illinois Housing Development Authority (IHDA) awarded \$230,000 in trust fund dollars to assist very low-income and low-income home buyers. Funding equal to \$20,000.00 or \$30,000.00, depending on the household income level, was approved, at a zero percent interest rate and amortized over a thirty year period and due as a balloon payment at maturity. Down payment grants of \$3,000.00 or \$5,000.00 are available, depending on the household income level, and forgivable over a five year term. In 2008 funds were utilized for five new homes constructed at Second and Mississippi Avenues, four rehabilitated houses and a newly constructed home at 652 Grant Avenue, which was the last time funding was available.

IHDA had also previously approved \$180,000.00 in funding for home modifications to benefit elderly and/or persons with disabilities. This funding expired on March 12, 2009. The City of Joliet completed eight home modification projects with funding provided by IHDA. The program assisted extremely-low and very-low income, elderly and/or disabled households with modifications to their homes for accessibility purposes. Forgivable loans were available to homeowners and landlords for a five year term. The loan is reduced by 1/60th for each full month the homeowner occupies the property; or, in the case of a rental, the property is occupied by extremely-low or very-low income tenants. Maximum loan amounts of \$15,000.00 or \$25,000.00 were available to qualified recipients. Referrals for the program came from three partnering agencies: Will/Grundy Center for Independent Living, Senior Services Center and Will County Center for Community Concerns.

Modifications to the eight homes assisted by the City of Joliet included ramps, handrails and wheelchair lifts into the house, a small addition to the front of a home and bathroom modifications such as the installation of grab bars, walk in bathtubs, lower sinks and the widening of doorways. The Neighborhood Services Division staff qualified the applicants, completed the work specifications and oversaw the project. The Will County Center of Community Concerns has applied for funding for home modification with the City of Joliet's support in 2010.

The City of Joliet also collaborated with local agencies and taxing bodies to apply for the State of Illinois NSP allocation. This resulted in approximately \$800,000 of the \$2.4 million grant award to be used in the City of Joliet in 2010/2011.

Roadway Improvement Program: The City of Joliet implements neighborhood public works projects through the Roadway Improvement Program. These projects include street reconstruction, street lighting, drainage and storm sewer projects. It is anticipated that the Roadway Improvement Program budget for 2011 will be approximately \$1.1 million which is funded by the State of Illinois Motor Fuel Tax Fund.

C. Local Resources

Assist First-Time Homebuyer Downpayment Assistance Program: The City of Joliet participated in the Assist program during the period of 1999 – 2008 and was one of the largest users of these funds in both targeted and non-targeted census tracts. In 2007, the Mayor and City Council approved the ceding of the City's entire \$11,577,680.00 of bonding volume capacity (CAP) to the Assist 2007 program, which ran from 4/1/07 through 3/30/08. In addition to offering a loan interest rate below conventional rates, the Assist program provides qualifying homebuyers with 4.25% cash assistance. A total of 120 homebuyers purchased homes in Joliet as a result of their participation in the Assist 2007 program. Total loan dollars utilized were \$17,314,973.00 with the average loan being \$144,291.47.

Illinois Housing Development Authority HELP Program: In 2008, the Mayor and City Council approved the ceding of the City's entire \$12,129,670.00 of bonding volume capacity (CAP) to the Illinois Housing Development Authority (IHDA). The City's decision to cede the bonding volume capacity to IHDA was based on a new requirement that first mortgage loans utilizing IHDA trust fund monies for downpayment assistance and interest free second mortgages must be IHDA loans. Additionally, the HELP program provides downpayment and closing cost assistance. The Illinois Housing Development Authority also has the capacity to develop programs that target specific areas, such as Districts 4 and 5, which complement the City's housing goals. The City also ceded \$3,000,000 for Mortgage Credit Certificates (MCC) to the Illinois Housing Development Authority in 2010.

Local Lending Institutions: The City of Joliet uses federal and state funds to leverage private resources to expand activities for low and moderate-income persons. The City has a \$2,000,000.00 line of credit with First Community Bank for the acquisition and rehabilitation of properties in its Local Homestead Program. Once a property has been completely rehabilitated, the City sells the property and pays down the line of credit with the net proceeds. Additionally, the City works with Harris Joliet to procure first mortgage financing for qualified participants of the Local Homestead Program at current market rates.

Public Land Auction: The City of Joliet has been acquiring vacant parcels through a public auction administered by the Will County Tax Agent for the past thirteen years. Many of these properties are used for the development of new single family homes. The homes are offered for purchase through the Local Homestead Program to low and moderate-income families. Since 1997, a total of 87 lots have been acquired through the public auction for use in the Local Homestead Program.

ACTIVITIES TO BE UNDERTAKEN

For Program Year 2011, the City of Joliet will undertake a variety of housing and other community development initiatives designed to address the priority needs and objectives as identified in the 2010 Consolidated Plan. Minimal Program Income is anticipated and is considered a contingency for the 2011 Program Year. A description of the activities is as follows.

1. Local Homestead Program (Project ID 0001/Local Code 11-1)

The City of Joliet will use a portion of its 2011 CDBG allocation to fund the continuation of the Local Homestead Program. It is anticipated that 1 low and moderate income family, will benefit from this activity. The properties to be used in this program would be acquired by the City of Joliet through a line of credit from a local lender.

- Applicant must be at least 18 years old.
- Provide a \$2,500 down payment, payable at the time of closing.
- Demonstrate the ability to repay the loan by showing stable employment for the last two (2) years.
- It must be at least four (4) years or more since a Chapter 13 or 7 bankruptcy has been discharged.
- All collections, judgments, etc. must be paid prior to approval.
- Attend 8 hour home counseling offered by a HUD-approved home counseling agency prior to closing on a home.
- Meet current income guidelines.

The City of Joliet has not yet identified the properties to be used for the Local Homestead Program:

Priority #1, Objective #2

Direct Homeowner Assistance	\$20,766.00
Program Delivery Costs	\$18,150.00
Estimated 2011 Allocation	\$38,916.00

2. Code Enforcement-Inspection of Housing Units & Environment (Project ID 0002/LocalCode 11-02)

The City of Joliet will continue to operate Property Maintenance Code Enforcement activities which are aimed at eliminating slum and blight. CDBG funds will be used to cover the operational costs for housing inspections and minor environmental problems, such as weeds, abandoned vehicles and debris. The funds allocated are for the cost of salaries and fringe benefits for a Supervisor, four (4) Property Maintenance Evaluators and one (1) Secretary. It is estimated that 21,000 inspections will be made during Program Year 2011. Locations where inspections will take place cannot be listed, since they are not known until a problem arises and an inspection is done. The activity will

take place in all low and moderate census tracts.

Priority #1, Objective #3

Delivery Costs	\$370,028.00
Estimated 2011 Allocation	\$370,028.00

3. Code Enforcement –Demolition of Vacant & Deteriorated Structures (Project ID 0003/ Local Code 11-03)

The City of Joliet will continue its efforts in eliminating dangerous and unsafe structures through the Circuit Court system. These are buildings that have been abandoned and have become a detriment to the neighborhoods. It is anticipated that 10 vacant, dilapidated and unsafe structures will be demolished in 2011. Locations of the anticipated demolitions cannot be listed as they are not yet known. However, the activity will take place on a spot basis citywide

Priority #2, Objective #3

Demolition Allocation	\$100,467.00
Program Delivery Costs	\$ 16,082.00
Estimated 2011 Allocation	\$116,549.00

4. Public Service – Graffiti Removal (Project ID 0004/Local Code 11-04)

The City of Joliet operates an aggressive Graffiti Removal Program and will continue to fund this activity in 2011. Unsightly graffiti is removed from public and private property. The city will complete approximately 820 graffiti removals in 2011. Specific locations where this activity will take place cannot be identified as they are not yet known. However, the activity will take place in all low and moderate census tracts.

Priority #2, Objective #3

Graffiti Removal Costs	\$ 7,000.00
Program Delivery Costs	\$20,542.00
Estimated 2011 Allocation	\$27,542.00

5. Public Service- Homeless Services (Project ID 0005/Local Code 11-05 (Substantial Amendment)

The City of Joliet will contract with Catholic Charities Daybreak Shelter to provide Homeless Services to homeless individuals in the form of health and housing counseling.

Priority #3, Objective #1

Delivery Costs	\$ 75,000.00
Estimated 2011 Allocation	\$ 75,000.00

6. Public Service – Neighborhood Newsletter (Project ID 0006/Local Code 11-06)

The City of Joliet has contracted with the University of Illinois Extension Services to produce a Neighborhood Newsletter that is published four times a year. The newsletter contains information concerning community development initiatives, housing opportunities and various topics for the residents of the low and moderate income areas. The newsletter is published in both English and Spanish and distributed to over 14,181 residents. The newsletter is mailed to all residents in the target area.

Priority #3, Objective #3

Newsletter Production Costs	\$14,696.00
Delivery Costs	\$ 1,153.00
Estimated 2011 Allocation	\$15,849.00

7. CDBG General Administration – (Project ID 0007/Local Code 11-07)

Funds have been allocated to operate the 2011 Community Development Block Grant general administration and oversight of all CDBG Activities and Projects.

Delivery Costs and Fringe Benefits	\$ 94,201.00
Program Overhead	\$ 28,196.00
Estimated 2011 Allocation	\$122,397.00

8. Infrastructure Improvements – (Project ID 0008/Local Code 11-08)

The City of Joliet will allocate \$129,162.00 in 2011 CDBG funds for infrastructure improvements. The activity will take place in all low and moderate census tracts with an emphasis on the target area. These improvements will include upgrading streets, and installing new storm sewers, curbs and gutters. The City of Joliet implements neighborhood public works projects through the Roadway Improvement Program. These projects include street reconstruction, street lighting, drainage and storm sewer projects. It is anticipated that the Roadway Improvement Program budget for 2011 will be approximately \$1.1 million which is funded by the State of Illinois Motor Fuel Tax Fund. These activities will be funded by non-CBG sources.

Priority #4, Objective #3

Infrastructure Improvements	\$131,412.00
Total for 2011	\$131,412.00

9. CHDO Set aside – (Project ID 0009/Local Code 11-09)

HUD requires that Participating Jurisdictions set aside at least 15% of their annual HOME allocation for investment only in housing to be developed, sponsored or owned by designated Community Housing Development Organizations (CHDOs). The City anticipates allocating \$80,000.00 in 2011.

Priority #1, Objective 2

CHDO Set Aside	\$80,000.00
Estimated 2011 HOME Allocation	\$80,000.00

10. Down Payment Assistance-(Project ID 0010/Local Code 11-10)

This activity is a continuation of a current activity involving the new construction/rehabilitation/purchase of single family homes. This is a HOME activity and the HOME funds allocated will be used for homebuyer's assistance. A total of \$50,000.00 of Program Year 2011 HOME funds have been allocated for this activity. It is anticipated that 5 homes will be assisted in 2011. The City of Joliet participates using a portion of its 2011 HOME allocation to provide homebuyer's assistance in the form of a mortgage subsidy. HOME funds in the amount of \$10,000.00 will be allocated to each new homebuyer to assist in making the home affordable.

Priority #1, Objective 2

Down payment Assistance	\$ 50,000.00
Estimated 2011 HOME Allocation	\$ 50,000.00

11. Rental – (Project ID 0011/Local Code 11-11)

Program Year 2011 HOME funds in the amount of \$254,651.00 will be allocated for the construction/rehabilitation/purchase of 2 rental units.

Priority #1, Objective #2

HOME Investment Partnership Allocation	\$254,651.00
Total for 2011	\$254,651.00

12. HOME Administration – (Project ID 0012/Local Code 11-12)

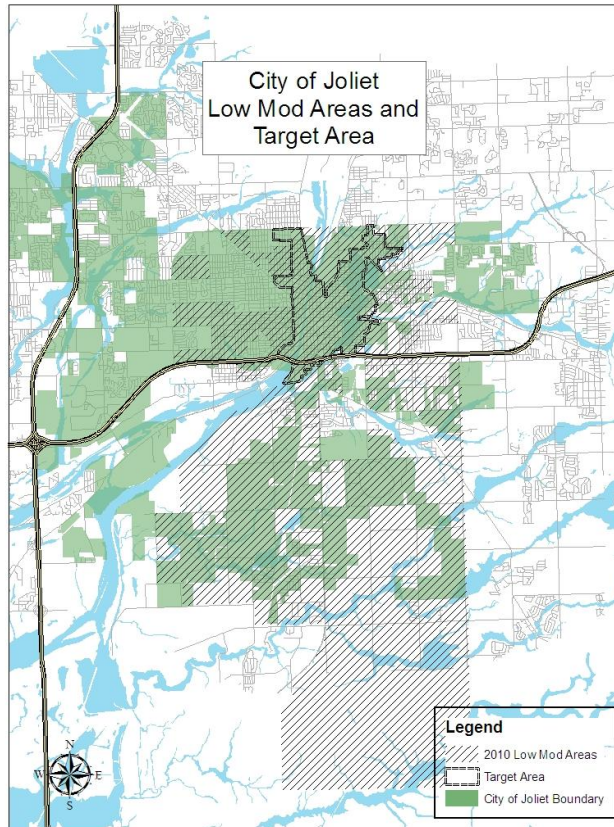
Program Year 2011 HOME funds in the amount of \$42,739.00 will be set aside for general management and oversight of the HOME activities. As required by HUD HOME regulations a Participating Jurisdiction is allowed to allocate 10% of its annual HOME funding for this purpose.

2011 HOME Administration	\$42,739.00
Total for 2011	\$42,739.00

Table 3C Consolidated Plan Listing of Projects can be found in **Appendix E** of this document.

GEOGRAPHIC DISTRIBUTION

The City of Joliet's housing and community development programs are targeted to low and moderate-income areas. As the City expands further west, the households are more affluent. Geographically, the low and moderate-income households continue to be distributed in the center of the City. The boundaries of the target area are outlined in black and the low to moderate income census tracts are shaded on the map.



An examination of the low/mod percentages for CDBG grantees indicates a significant concentration in those census tracts located in the center of the City. The City anticipates at least 70% of funds expended will be dedicated to the target area and low/mod income census tracts. An asterisk (*) denotes those census tracts in the target area.

Low/mod Percentages for CDBG Grantees Based on FY10 Participation

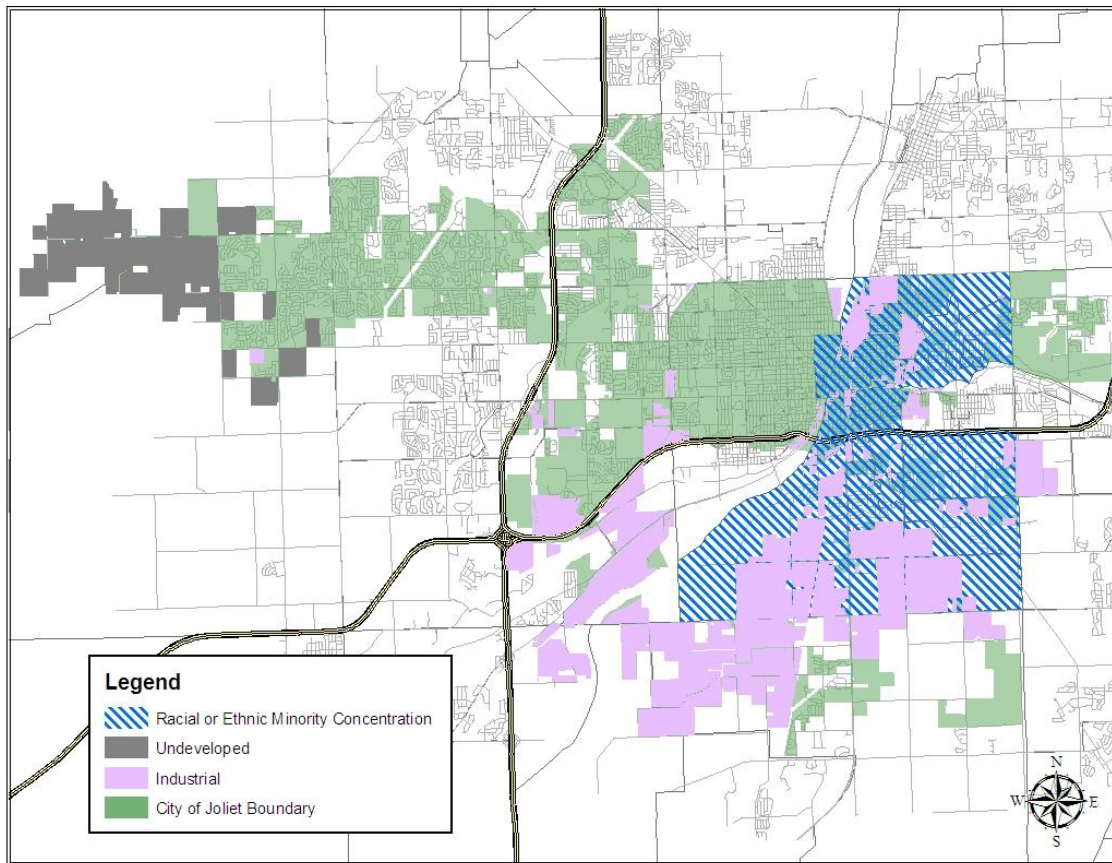
Census Tract	Low/Mod Percentage
8812.00 blk 1	78%
* 8812.00 blk 2	69%
* 8813.00	75%
* 8814.00 blk 1	55%
* 8814.00 blk 2	66%
8814.00 blk 3	52%
8814.00 blk 7	55%
8816.00 blk 2	63%
* 8818.00 blk 1	53%
8818.00 blk 2	63%
* 8819.00	75%
* 8820.00	80%
* 8821.00	81%
8822.00	68%
8823.00 blk 1	56%
8823.00 blk 3	52%
* 8824.00	65%
* 8825.00	74%
* 8826.00 blk 1	63%
8826.00 blk 2	53%
8826.00 blk 5	52%
8827.00 blk 2	59%
8827.00 blk 3	69%
8827.00 blk 4	52%
8828.00 blk 1	64%
8828.00 blk 3	56%
8829.00 blk 1	53%
8830.00 blk 1	100%
8830.00 blk 3	70%
* 8831.00 blk 3	80%
8833.02 blk 2	100%

HUD defines areas of racial or ethnic minority concentration as geographical areas where the percentage of a specific minority or ethnic group is 10 percentage points higher than in a county or municipality overall. In Joliet, Blacks accounted for 14.3% of the overall population in 2010. Therefore, an area of racial concentration of Blacks would include any census tract where the percentage of Black residents is 24.3% or higher. Seven census tracts meet this criterion (8812, 8819, 8820, 8824, 8825, 8830, and 8831).

Hispanic residents represent 23.3% of Joliet’s total population. An area of ethnic concentration would include any census tract where the percentage of Hispanics is 33.3% or higher. Six census tracts meet this criterion (8813, 8819, 8820, 8821, 8822, and 8824).

Three census tracts are areas of both racial and ethnic concentration of Blacks and Hispanics. These tracts are 8819, 8820, and 8824.

There are no areas of racial concentration for Asians. The following map depicts this information.



HOMELESSNESS AND OTHER SPECIAL NEEDS ACTIVITIES

The City is an active participant in the Will County Continuum of Care, which is continuously working with the homeless and special needs population. The Continuum of Care has received close to \$20 million for Will County/Joliet through the SuperNOFA funding process since 1997.

The 2009 Continuum of Care (CoC) Homeless Assistance Program Project Listing is as follows:

Renewal Applications - Permanent Supportive Housing Projects (PH)

Cornerstone Services, Inc.

- Permanent Housing for Homeless Persons with Mental Illness and Their Families
Projected Renewal Amount: \$1,702,441 Location: Scattered Sites; Will County
- Permanent Housing for Homeless Veterans with Mental Illness
Projected Renewal Amount: \$115,071 Location: Scattered Sites; Will County
- Permanent Housing for Chronically Homeless Veterans with Mental Illness I
Projected Renewal Amount: \$25,476 Location: Scattered Sites; Will County
- Permanent Housing for Chronically Homeless Veterans with Mental Illness II
Projected Renewal Amount: \$24,948 Location: Scattered Sites; Will County

Trinity Services, Inc. in partnership with Lamb's Fold Center for Women and Children

- Permanent Housing for Women with Mental Illness and Their Children Projected Renewal Amount: \$253,317 Location: Scattered Sites; Will County

Renewal Applications - Transitional Housing Projects (TH)

Catholic Charities-Diocese of Joliet

- Daybreak Center - Transitional Housing for Women and Their Children Projected Renewal Amount: \$754,500 Location: 611 E. Cass Street, Joliet

Christian Family Ministries, The Lamb's Fold Center for Women and Children

- Transitional Housing for Women with Mental Illness and Their Children Projected Renewal Amount: \$33,250 Location: 153 S. Ottawa Street, Joliet

New Project Applications - Permanent Housing Bonus

Christian Family Ministries, The Lamb's Fold Center for Women and Children in partnership with Trinity Services, Inc.

- Permanent Housing for Chronically Homeless Women Two Year Grant: \$52,030 Location: Scattered Sites; Will County

Catholic Charities Daybreak Center, with a capacity for 100 persons, is currently the only emergency shelter located in Joliet. The center provides emergency shelter, food, supportive services and case management services to individuals and families. It also serves as a cooling/warming center depending on the season. Additionally, Cornerstone Services provides permanent supportive housing for two chronically homeless veterans through SuperNOFA funding. The Continuum has an Annual Open Leadership Meeting that contains minutes of the meeting, updates on annual activities, structures and reports. A copy of this item is attached as **APPENDIX A**.

OTHER ACTIONS

A. Obstacles to Addressing Underserved Needs

Affordable housing has been identified in the 2010 Consolidated Plan as the highest priority need. The Local Homestead Program addresses that need through acquisition/rehabilitation of existing homes and new construction. A major obstacle to addressing the need for affordable housing is the current housing crisis. The current economic climate is impacting city spending, as evidenced by budget projections for 2011 that anticipate revenues remaining flat and a reduction in discretionary spending.

The cost of acquiring properties for rehabilitation has been positively influenced by the housing market, but is offset by rising rehabilitation costs. Because the City's target area includes the oldest sections of Joliet, historic preservation requirements are an additional obstacle to affordable housing. Rehabilitation costs are driven up when elements must be fixed rather than replaced, due to their historic or architectural significance. The end result is an expensive home requiring additional down payment assistance and/or leveraged financing.

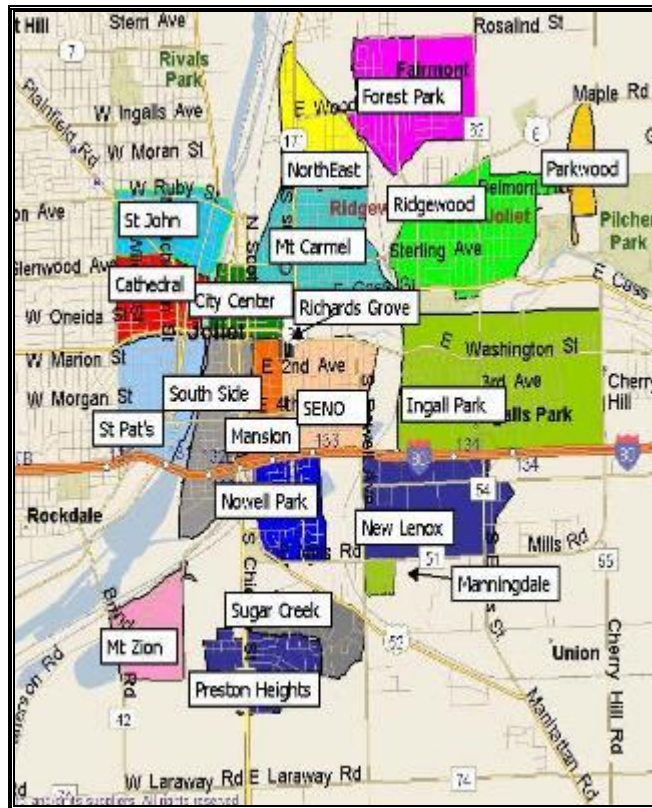
The City continues to work on Hickory Creek and Spring Creek, which flow through the heart of the east side target area. The project to deepen Hickory and Spring Creeks is funded by the Department of Natural Resources Division of Waterways and is taking several years to complete. Rehabilitation in flood plains is very difficult to complete and, in some instances, impossible to consider due to FEMA rules with regard to rehabilitation projects in the floodplain. This leaves the City unable to acquire certain properties for the Local Homestead Program. Even if the purchase prices of properties are within budget to acquire, the cost to rehabilitate is not feasible due to their location in the floodplain. Once the project to deepen Hickory Creek and Spring Creek is completed, a Letter of Map Revision will be requested. Once approved, some of the properties currently in the flood plain will be reclassified as no longer in the flood plain. This action will positively impact the City's ability to undertake new construction and rehabilitation projects in that area.

B. Foster and Maintain Affordable Housing

Code enforcement is the key to maintaining and improving the affordable housing stock. Rental and property maintenance inspectors work with various other departments to focus on problems that threaten safe and secure housing. The City utilizes an administrative review process to mitigate housing problems on a timely basis. Additionally, the City inspects rental properties through the Rental Inspection Program. All rental properties with three units or above and all non-owner occupied two units are required to be inspected.

Properties are certified for two to four years, depending on the number of code violations and timeliness of the property owner's response to code violations. The City offers the Landlord Training Program once a year in order to educate property owners on such topics as fair housing regulations, lead paint disclosure requirements, property maintenance codes, fire safety and crime prevention. Training consists of a three hour program which includes presentations by the City's police, planning and zoning and neighborhood services departments. Landlords receive the training program manual, the international property maintenance codes, rental inspection ordinances and other materials deemed appropriate to promote decent and safe housing. Attendance is mandatory for landlords brought in for an administrative hearing and is highly recommended for new and longtime landlords.

Fourteen Neighborhood Oriented Policing Team Officers (NOPT) work in eleven target areas throughout the City. These officers are familiar with the residents in their neighborhoods and respond to all calls for service during their shift. They are taught to seek long-term solutions to repeat problems and to work with residents to create a safer environment. The City also participates in neighborhood meetings. Three neighborhood groups, St. John's (CT 8818 & 8819), St. Pat's (CT 8826), St. Mary Nativity's (CT 8818 & 8819) all of which are located in the target area, hold meetings regularly attended by city officials. Unity CDC has also assisted in the formation of Neighborhood Councils that meet to address neighborhood issues. Housing, safety and code enforcement issues are addressed and residents work in partnership with the City to resolve issues in their neighborhoods. These Neighborhood Councils have been identified by Unity CDC on the following page.



C. Removal of Barriers to Affordable Housing

As of this writing the City’s Fair Housing Analysis identified three major impediments to affordable housing: negative credit, lack of downpayment and housing affordability. The housing finance specialist in the Neighborhood Services Division provides one on one credit counseling to households with negative credit and assists them in re-establishing their credit. Will County Center for Community Concerns also offers homebuyer counseling classes, which qualified applicants of the Local Homestead Program attend prior to closing on their homes.

Through its Local Homestead Program, the City provides funds for mortgage buy downs which are forgivable per HOME regulations. The City will continue to work with local financial institutions and IHDA to provide affordable mortgages to very low to moderate income households.

Willfindhousing.org is a web-based solution that provides renters, landlords, property managers and housing agencies a single point of access to Will County’s affordable/low-income housing market. At Willfindhousing.org, you can easily perform specialized searches that help in locating affordable, accessible and special needs housing on the internet for subsidized and private market housing. Willfindhousing.org offers various search criteria with special features like the Affordability Calculator, a tool that helps renters determine affordable monthly rent based on their household income. Realtors or private owners can even list properties for sale. The biggest difference from other sites is

that this one is locally managed, locally based, has the most accurate information on local resources, and was tailored to the needs of Will County. This service is free to everyone.

The City continues its participation in the Accessible Cities Alliance (ACA), a broad-based coalition comprised of community leaders, disability advocates, business and local municipality representatives. Established in February 2003, the Alliance has a three-fold mission:

1. Improving voluntary compliance with the ADA and related accessibility laws.
2. Working with businesses to provide a host of resource to achieve full compliance, from accessibility audits to ADA and disability training, product and resource recommendations, and financing coordination.
3. Continually promoting efforts toward a barrier-free society. Since the passage of the ordinance enacting the Joliet Accessibility Code in 2004, the City has employed a full-time building safety inspector to conduct on site inspections for ADA compliance.

D. Evaluate and Reduce Lead-Based Paint Hazards

The homes which the City acquires and rehabilitates through its Local Homestead Program are located in the target area, which includes the majority of housing units built prior to 1978. Purchasers of pre-1978 built city-owned houses are provided with a copy of the lead paint pamphlet, Protect Your Family From Lead in Your Home. The City also requires contractors to follow HUD's lead-based paint regulations for construction and rehabilitation projects funded through the CDBG and HOME programs. Work write-ups for projects include a section on lead-based paint testing and abatement when necessary under the current regulations. The City also includes a section on Residential Lead Paint Disclosure Requirements in the Landlord Training Manual, which landlords receive when they participate in the Landlord Training Program. Staff continues to attend training on these requirements. The rehabilitation specialist and the housing finance specialist attended the recent Lead-Based Paint Training Course held at the HUD Chicago Regional Office in 2008. The rehabilitation specialist has also completed HUD's Visual Assessment Course.

In Will County, three zip codes are high risk for lead poisoning: 60432, 60433 and 60436. All three of the zip codes are located in Joliet. The Illinois Lead Program Surveillance Report – 2008, contains the results of blood lead testing in Will County on all children 15 years old or younger:

- 7,075 children were tested in Will County
- 34 children had blood lead test results of 10 – 14 mcg/dL
- 20 children had blood lead test results of 15 – 19 mcg/dL
- 4 children had blood lead test results of 20 – 24 mcg/dL
- 7 children had blood lead test results of 25 + mcg/dL

Based on testing throughout the State of Illinois, there is a difference in lead poisoning by race. African-American children are twice as likely to be affected by lead poisoning compared to Caucasians. African Americans are slightly ahead of Asian and Hispanic children. Lead poisoning in Asian children is on the rise. One logical explanation for disparity to lead exposure can be attributed to the fact that minorities are more likely to live in older housing, common to high-risk zip codes. While lead paint is the source of

most lead poisoning cases, folk remedies and products containing lead also may contribute to the higher lead poisoning rates of minority children.

Education is a key component to reducing lead-based paint hazards. In Illinois, all children from low income families (i.e., Medicaid-eligible children) should receive a blood lead test at ages 12 and 24 months, even if they live in a low-risk zip code area. If the child is 3 through 6 years old and has not been tested, a blood lead test is required.

Will County's 2007 Lead Grant was a "Lead Hazard Reduction Demonstration Grant" in the Amount of \$1,500,000. In 2009 Will County applied for and received a "Lead Hazard Control Program" grant in the amount of \$2,070,000. They are on target and expect to have 130 homes cleared for the first lead grant by the end of September and also 8 additional homes completed and cleared on the new lead grant.

E. Reduce the Number of Poverty Level Families

The Neighborhood Services Division of the City of Joliet works closely with the Will County Continuum of Care to set up and offer training for individuals. Some of the trainings offered are welding, computer, typing and food service. The purpose of the classes is to provide individuals living in homeless shelters with the education needed to obtain gainful employment. Individuals who complete the course of study receive a certification of completion which provides them with greater opportunity in the job market. In 2008, 4 individuals completed CNA training through Joliet Junior College. In 2009, 8 individuals completed Forklift Safety Certification through Sunbelt Rentals and 2 individuals completed Food Sanitation Certification through the Will County Health Dept. Employment training has not been held in 2010.

One outcome of the Quality of Life Plan was the formation of Unity CDC, which will oversee proposed actions in ten subject areas in Districts 4 and 5. The subject areas are housing, education, human capital, industrial development, employment, land use, neighborhood character, recreation, retail development and transportation. The City is working closely with Unity CDC in the development and completion of the action items. A copy of the most current Unity CDC newsletter is included in **Appendix B**.

F. Institutional Structure

The City of Joliet will continue to work with the Illinois Housing Development Authority (IHDA) to assist very-low and low income households purchase homes through the City's Local Homestead Program. The City will work with Harris Bank to finance the purchase of Local Homestead properties by qualified applicants. The City will continue to work in cooperation with the Housing Authority of Joliet on issues related to public safety and resident initiatives. Neighborhood Oriented Policing Team Officers are assigned to many of the Housing Authority sites. Additionally, the City has committed funding to the Liberty Meadow Estates Development project that is currently underway at Rosalind and Briggs Street.

G. Coordination

It is a priority of the City of Joliet to strengthen partnerships in housing and community development. During 2011, the City will continue to work in cooperation with the Housing Authority of Joliet on issues related to public safety and resident initiatives. Neighborhood Oriented Police Team Officers are assigned to many of the housing authority sites.

With a city councilman and Director of the Neighborhood Services Division on various committees of the Will County Continuum of Care, the City will be actively involved in this group's undertakings in 2011.

H. Public Housing

This information was provided by the Housing Authority of Joliet from the Housing Authority of Joliet's 2010 Annual and Five-Year Plan

The Housing Authority of Joliet, created by the Joliet City Council in 1945, is a private municipal corporation governed by a seven (7) member Board of Commissioners. The Board members, appointed by the Mayor, each for a five-year term, set the overall policy in matters concerning the operation of the Housing Authority. The Chief Executive Officer, appointed by the Board of Commissioners, is responsible for coordinating and carrying out the policies established by the Board of Commissioners.

Since its creation in 1945, the Housing Authority has grown from a small operation, providing housing for low income families to one of the largest single property managers in the City of Joliet. The Authority currently operates 989 public housing units and, under Phase I of Liberty Meadow Estates, 74 lease-to-own mixed-income housing units (63 Tax Credit Eligible).

Of the 989 Public Housing Program units, 302 are family units and 687 are designed for seniors and persons with disabilities. The 2010 budget to administer the Public Housing Program is \$7,221,625. The public housing communities that are managed by the Housing Authority of Joliet are indicated in the chart below:

NAME	PROJECT NUMBER	NUMBER OF UNITS	LOCATION
*Murray and Downey Homes	AMP 1	76	Des Plaines, Wallace, Marion and York Streets
*Van Horne Homes		46	Water Street
*Des Plaines Gardens		40	Allen, DeKalb, Des Plaines, Joliet and Wallace Streets
Fairview Homes	AMP 3	168	Cardinal Lane, Englewood, Fairmont, Juniper, Robin Lane and Rosalind Streets
John O. Holmes Complex	AMP 4	125	401, 407, 411, 415, 419 and 420 North Bluff Street
Heritage Place	AMP 5	45	400 North Bluff Street
John C. Murphy Building	AMP 6	139	311 North Ottawa Street
John F. Kennedy Terrace	AMP 7	173	2200 Oneida Street
Adlai Stevenson Gardens	AMP 8	177	102 Stryker Avenue

*Denotes contiguous sites.

Additional grants are received periodically for the Renovation and Modernization of existing facilities. The public housing program for the Housing Authority of Joliet is not limited to the rental and maintenance of physical facilities, but also includes many social and economic programs designed to enhance the quality of life of low-income families served.

The Authority also provides rental assistance for a total of 1,144 households, which are scattered throughout Will County, under the Housing Choice Voucher Program, with a 2010 Operating Budget of \$10,136,444. The Housing Authority receives applications,

determines eligibility, enrolls owners and negotiates the lease with the landlord. Monthly, the Authority pays to the landlord a portion of the rent that is calculated based on the tenant's monthly income. This mechanism, through involvement of the private sector, is enabling the expansion of housing choices available to low income families.

Additionally, the Authority implemented a Housing Choice Voucher Homeownership Program in 2003 which has since enabled eighteen (18) families to purchase homes.

The senior / disabled properties are in very good condition and the Authority has worked hard to ensure their marketability. Additionally, the HAJ has participated in other initiatives in order to complete more improvement needs in shorter periods of time (i.e. The HAJ entered into an energy savings performance contract in 2003 wherein \$2.1MM of capital saving components were installed at all the senior / disabled public housing locations; and in 2005 the Authority pledged a portion of its future capital fund allocations in order to receive \$6.8MM to address the health & safety and life cycle needs of the senior / disabled public housing locations).

In March, 2009 the Authority received an addition \$2,528,174 in Capital Funds through the 2009 American Recovery and Reinvestment Act to assist the HAJ with capital improvement needs at its public housing properties, while ensuring local jobs would be saved/created with the funding. The following work items were able to be initiated thanks to this additional funding:

- Replacement of Roofs at 5 locations;
- Trash Compactor Upgrades at 5 locations;
- Exterior Joint Tuck-pointing/Caulking at 4 locations;
- Water Softener Replacements at 6 locations;
- Installation of Emergency Generators at 5 locations;
- Installation of Heat Pumps at 3 locations;
- Installation of Booster Pumps at 2 locations;
- Installation of Stainless Steel Boiler Exhaust Piping at 2 locations;
- Bathroom Remodel / New Shower Stalls at 2 locations; and the
- Main Office - Administrative Building Renovation and Staff Salaries.

Housing Needs of Families on the Waiting List

<i>Public Housing Program Waiting List</i>	No. of Families	% of Families
Waiting List Total	806	
Extremely Low Income < 30% AMI	744	96.62%
Very Low Income > 30%, but < 50% AMI	23	2.85%
Low Income > 50%, but < 80% AMI	2	.25%
Families with Children	353	43.80%
Elderly Families	74	9.18%
Families with Disabilities	38	4.71%
White	172	21.34%
Black	626	77.67%
Native Americans	2	.37%
Hispanic	36	4.47%
Asian	3	.37%
Multi-Racial or Declined to Report	3	.37%

9/15/2010

<i>Housing Choice Voucher Program Waiting List</i>	No. of Families	% of Families
Waiting List Total	1945	
Extremely Low Income < 30% AMI	1413	72.65%
Very Low Income > 30%, but < 50% AMI	454	23.34%
Low Income > 50%, but < 80% AMI	69	3.55%
Families with Children	1510	77.63%
Elderly Families	46	2.37%
Families with Disabilities	334	17.17%
White	213	10.95%
Black	1695	87.15%
Native Americans	7	.36%
Asian	2	.01%
Hispanic	86	4.42%
Multi-Racial or Declined to Report	28	1.44%

PROGRAM SPECIFIC REQUIREMENTS

CDBG: The activities to be undertaken utilizing CDBG funds are described on pages 11- 14 under “ACTIVITIES TO BE UNDERTAKEN.”

HOME: HOME funds will be invested according to HOME regulations described in 92.205(b) and are described on pages 11-14 under “ACTIVITIES TO BE UNDERTAKEN.” HOME funds may be invested jurisdiction-wide but will not be used to refinance multifamily loans made or insured by any Federal program, including CDBG.

Recapture Requirements for HOME: The City of Joliet imposes recapture requirements on HOME-assisted housing. The HOME-assisted housing must meet the affordability requirements for not less than the applicable period specified in the following table, beginning after project completion.

Homeownership Assistance HOME amount per-unit	Minimum period of affordability in years
Under \$15,000.00	5
\$15,000.00 to \$40,000.00	10
Over \$40,000.00	15

At the time the homebuyer purchases the HOME-assisted property as their personal residence, a mortgage is signed and recorded. The amount of the HOME funds and the affordability period are included in the document. If the buyer chooses to sell the premises or no longer use it as his/her principal residence during the affordability period, the City’s mortgage will appear on the title commitment. The City will be notified when a payoff figure is requested. The entire amount of the HOME investment will be recaptured out of the net proceeds of any sale of HOME-assisted property. Net proceeds include the sales price, less loan repayments. If the net proceeds are not sufficient to recapture the entire HOME investment, plus allow the homeowner to recover the amount of their down payment, acquisition costs, principal payment and any other capital improvements, then the City may reduce the amount of recapture on a pro-rated basis. The pro-ration will be based on the length of time the homeowner occupies the property relative to the required affordability period as outlined in the chart above. Once funds are recaptured, they will be utilized to assist other homebuyers as required by HUD. The requirements of this paragraph shall survive closing and shall not merge in the deed to the premises. The seller may incorporate the HOME and federal affordability requirements into deed restrictions, restrictive covenants or similar instruments.

HOME Affirmative Marketing Requirements:

An affirmative marketing plan is required for multifamily housing projects containing 5 or more HOME-assisted housing units. Advertisements in print media, such as newspapers, brochures, signs and leaflets, must have the equal housing logo or slogan prominently displayed on all materials. Community organizations, places of worship, fair housing groups and employment centers are to be utilized to inform and solicit applications from persons in the housing market who are not likely to apply for the housing without special outreach. Additionally, the equal housing opportunity poster must be conspicuously displayed in the rental office, model unit or wherever rental information is being distributed. All rental staff must be familiar with fair housing laws and the affirmative marketing plan. Records and documentation regarding affirmative marketing actions taken are to be maintained. These will include documentation of contact with community groups, copies of current advertisements and demographic data on tenants/homeowners. The City of Joliet will maintain records regarding monitoring, as well as an assessment of the HOME recipient’s affirmative marketing actions. The City will also maintain records of demographic data on tenants (i.e., sex, race, age, income, etc.) gathered at annual on-site monitoring inspections. If a determination is made that the

recipient is not in compliance, the City will provide assistance in obtaining compliance. In those cases where the recipient continues to be in non-compliance, the City will take corrective action, including termination, if deemed necessary.

HOME Matching Requirements:

The HOME match requirement for all HOME-eligible activities is 25% of any funds expended. The City of Joliet will be using the following sources for match: infrastructure improvements, land donation, IHDA Housing Trust Funds, waived building permit fees and other associated construction costs. The City will also utilize the match accrued from other HOME projects to meet the 2011 HOME match requirements.

Monitoring

A. Standards and Procedures

Program evaluation and monitoring is the means utilized by the City of Joliet to provide the necessary administrative oversight and performance evaluation of all activities undertaken using HUD assistance under the 2010 Consolidated Plan as well as the 2011 Action Plan. Evaluation and monitoring applies to all activities undertaken by the City of Joliet as well as all activities undertaken by a sub-recipient or CHDO.

Specific Regulatory Requirements

Specific regulatory requirements of HUD programs are included or will be included as a requirement for compliance in all sub-recipient or CHDO written agreements in compliance with the requirements of the HUD program and the activity being proposed.

Contract Requirements and Monitoring Procedures

Although there will be instances, as with any community, where differences in the specifics of contracts will occur, all contracts and agreements will contain certain items. Those items that will be a constant in all contracts and agreements include: dollar amount, what work or activity is to be undertaken, timetable and performance requirements, record keeping and monitoring. Neighborhood Services staff is charged with the responsibility of assuring that all activities, whether city-initiated or through a CHDO, are completed per all applicable laws and regulations. Depending on the type of activity, Neighborhood Services staff members will be assigned specific jobs in the monitoring process. The Neighborhood Services Director will ensure that all performance and compliance requirements for the CDBG and HOME Programs are met. The Finance Specialists will perform the necessary environmental and historic reviews for all activities requiring these reviews. The Rehabilitation Specialist will perform all regular monitoring of rehabilitation and new construction projects.

The monitoring of activities will be conducted in a positive, productive and pro-active manner to ensure that all problems are identified early enough in the process or activity to prevent irreversible consequences. If problems are found during any monitoring process, technical assistance will be provided either by the City of Joliet or HUD. The City of Joliet intends to maintain communication and offer feedback on performance issues with entities utilizing any federal program.

It is the intent of the City of Joliet to adequately educate any sub-recipient or CHDO as part of the monitoring process. All requirements will be reviewed and explained to each individual sub-recipient or CHDO prior to City Council approval of the agreement. The City of Joliet intends to monitor each activity's or sub-grantee's performance and compliance on an ongoing basis. The common denominator to all activities is the disbursement of funds and accurate documentation of costs through a disbursement. Prior to any disbursement of funds, all compliance issues will have to be remedied. This desk monitoring will be an on-going exercise. In addition, all CHDO projects will be inspected on an annual basis by means of a field monitoring visit. New CHDOs will experience more frequent on-site monitoring during all phases of their activities, including more frequent post-construction visits.

The City of Joliet will begin a more intensive monitoring of all disbursements through comparison with all schedules or completion dates to ensure that:

- Funds requested for any activity do not exceed authorized budget allocations.
- All funds requested are appropriate and in line with scheduled expenditure rates or benchmarks as set forth by any contract or agreement.
- The activity or CHDO is performing or has the capacity to perform as per the agreement or contract.

A series of reports will be developed and used for monitoring all activities that are initiated by the City of Joliet. These reports will be used to measure progress. The reports that will or have been developed are as follows:

- Quarterly Financial Report - This report will measure the expenditure and encumbrance rates for all CDBG activities to ensure that funds are being expended in a timely manner.
- Quarterly HOME Program Activity Status Report – This report will track all HOME expenditures
- Environmental Review Status Report
- Homeowners Assistance Report – This report will indicate the status of each application for assistance.

B. Progress Measures

For CHDO or other sub-recipient activities, the measurement of progress will be predicated on what type of activity is being performed and the schedule and benchmarks set forth in the agreements. For other activities covered in the Consolidated Plan and this Annual Action Plan, the City of Joliet will initiate a schedule establishing appropriate benchmarks and expenditure targets. Each program or activity will have its own thresholds and goals. Although the overall program scheduling is primarily focused on the total activity, the specifics of each activity will be incorporated. Overall performance of all activities will be reviewed at least quarterly to determine progress and other scheduling items as deemed appropriate.

C. Long Term Compliance Monitoring

The City of Joliet's Consolidated Plan covers a 5-year period from January 1, 2010 through December 31, 2014. During that period the City of Joliet plans to complete all

goals identified in the Consolidated Plan. Of course, realizing all the goals set forth in the Consolidated Plan depends on federal funding levels remaining constant. The City of Joliet will reassess all long-term goals prior to the development of each Annual Action Plan under the Consolidated Plan. This will be done by assessing progress made the previous year(s) and expectations for the upcoming year. This assessment will be used as a tool to determine if specific goals are feasible. Additionally, each year the City of Joliet will reassess the long-term goals in coordination with measurements of activity progress and benchmarks. This reassessment will be conducted at the beginning of the 6th month of any Action Plan year.

HOME On-Site Inspections

Activities funded under the HOME program will be monitored for compliance at least once a year for a period that is equal to a specific activity's period of affordability. A notification letter will be sent to each HOME-assisted agency at least two weeks prior to the monitoring visit and include the date and scope of the inspection. Follow-up letters are sent after the monitoring visit to advise the agency of any concerns, findings or corrective actions to be taken. Currently, annual on-site monitoring visits are performed at the following HOME assisted rental housing projects: Victory Centre of Joliet, Louis Joliet Apartments and 19 properties owned by Cornerstone Services. The locations of the properties owned by Cornerstone Services are:

711 Ann Street	3113 Heritage Drive
1802 Birmingham Drive	1850 Mappold Way
7708 Briarcliff Drive	1701 Mason Avenue
1323 Buell Avenue	754 – 756 McDonough Street
1312 – 1314 Coral Bell Drive	1710 Oneida Street
3301 Fiday Road	7105 Pyramid Drive
1204 Galway Road	400 – 402 Raynor Avenue
2883 Heritage Drive, #2D	404 Terry Drive
220 Madison Unit C-3	3515 Theodore
201 Pleasant	

HOME-assisted files are reviewed for compliance with affordability, income targeting and tenant participation requirements. Leases are examined to confirm that they contain no prohibited provisions, terms are at least one year (unless otherwise agreed upon by the tenant and owner), rents do not exceed the maximum HOME rents and that they are properly executed. Income certification and source documentation are also reviewed. Inspections are made of 15% of the HOME-assisted units to ensure that minimum property standards are met.

The 2010 CAPER identified the match liability and the match associated.

E. Minority Business Outreach:

It is the policy of the City to provide equal opportunities for firms owned by minority and women business enterprises to bid on all contracts awarded by the City of Joliet. It is also the policy of the City to prohibit discrimination against any business in pursuit of these opportunities, to conduct its contracting activities so as to prevent such

discrimination, to correct present effects of past discrimination and to resolve complaints of discrimination. The City maintains a mailing list of small, minority and women-owned businesses interested in doing residential rehabilitation work. A notice of bid availability is routinely distributed to businesses on this mailing list and is advertised in the legal section of the local newspaper. The City also encourages minority participation in non-housing community development projects, such as demolition and clearance, weed cutting and board ups. The City maintains a listing of minority and women-owned businesses which is updated annually.

SUBSTANTIAL AMENDMENT TO THE 2010-2014 CONSOLIDATED PLAN

Criteria for Amending the Consolidated Plan

Amendments to the consolidated plan that is substantial enough for public notification will be published in a local newspaper of general circulation. Citizens and/or interested parties will be provided the opportunity to comment on changes that require amendments. Amendments will be made available to the public at the time of submittal to HUD. Amendments to the consolidated plan will be made based on the following decisions:

- ~~1. When a substantial change occurs in allocation priorities in excess of 50% net of the entire allocation for the funding year.~~
- ~~2. When a decision is made to fund an activity using funds from any program covered by the consolidated plan (including program income) not previously described in the action plan; or~~
- ~~3. When a decision is made to not fund the project previously described in the Action Plan.~~

To carry out an activity not previously described in the action plan if such activity exceeds \$200,000 in use of reallocated funds;

5. Public Service- Homeless Services (Project ID 0005/Local Code 11-05 (Substantial Amendment))

The City of Joliet will contract with Catholic Charities Daybreak Shelter to provide Homeless Services to homeless individuals in the form of health and housing counseling.

Priority #3, Objective #1

Delivery Costs	\$ 75,000.00
Estimated 2011 Allocation	\$ 75,000.00