

Exhibit B: Threshold  
Requirements and Other  
Submission Requirements  
Region 1 Planning Council

### **Resolution of Civil Rights Matters**

There are no charges, cause determinations, lawsuits, or letters of findings against Region 1 Planning Council (R1) with respect to local, state, or federal violations or non-compliance with the Fair Housing Act, Title VI of the Civil Rights Act of 1964, or any other laws regarding non-discrimination.

### **Timely Submission**

R1 will submit on or before the due date of 11:59 pm EST on October 15, 2024. The applicant understands that if the application is submitted through Grants.gov after this date and time, it will be considered ineligible and not considered for funding.

### **Eligible Applicant**

R1 is an eligible applicant under the 25 subcode “Other.” R1 is the designated Metropolitan Planning Organization (MPO) for the Rockford Region, which includes the urbanized areas of Winnebago, Boone, and parts of Ogle Counties. Additionally, R1 is the administrator for the Northern Illinois Land Bank Authority (NILBA) and Delinquent Tax Agent for the Winnebago and Boone County Trustee Programs, which returns blighted property to productive use by acquiring abandoned property, clearing the title and liens, and reselling to a responsible owner. The NILBA covers a five-county area in Northern Illinois: Stephenson, Winnebago, Boone, McHenry, and Ogle Counties. The Boone and Winnebago County Trustee Programs includes Winnebago and Boone Counties. NILBA as well as the Boone and Winnebago County Trustee Programs are integral tools for R1’s initiatives regarding affordable housing, providing cost-effective, readily developable land for redevelopment.

### **Number of Applications**

Region 1 Planning Council is submitting one application for consideration.

### **Limited English Proficiency (LEP)**

R1 follows the guidelines established in its Limited English Proficiency (LEP) plan, adopted in 2022 and prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq. The plan provides guidance on identifying the need for language assistance, means for providing translation services, outreach techniques, a system for monitoring and updates, and the procedure for filing a complaint.

R1’s public engagement site can be translated into the nine principal languages spoken in the region: English, Spanish, Arabic, Croatian, Polish, Serbian, Tagalog, Vietnamese, and Mandarin Chinese. Spanish translation services are available on-site and R1 is able to provide an interpreter for other languages with 48 hours’ notice.

### **Physical Accessibility**

R1’s Title VI program aligns with all federal laws, regulations, and guidance that govern nondiscrimination in its programs and activities. It reflects R1’s commitment to implement activities and planning processes that protect against discrimination and to ensure that it provides fairness and consideration of issues impacting disadvantaged residents, as well as outline a complaint process if an individual feels they have been discriminated against in one of R1’s programs or activities. This plan extends to R1’s developer partners, ensuring that construction

plans follow ADA requirements, and assuring the home sale process follows Fair Housing Act specifications.

The R1 office building is handicap accessible. Handicapped parking is available in the parking lot directly across the street from the building. There is a curb ramp from the street to the R1 building and portable ramps are available for steps inside the building.

Public comment is provided online through R1's public engagement site. Posted material and type of feedback requested on the public engagement site is identical to that at in-person events. Additionally, all in-person interactions may be held via Zoom upon request, allowing persons with disabilities to best decide and utilize the accommodation best suited for them. R1 agrees to comply with all reasonable requests for accommodations with sufficient notice.

In addition, all notices of and communications during all training sessions and public meetings shall be provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities or provide other means of accommodation for persons with disabilities consistent with section 504 of the Rehabilitation Act of 1973 and HUD's section 504 regulations. See 24 CFR section 8.6.

### **Environmental Review**

Should R1 be awarded PRO Housing funding, the organization agrees to comply with all applicable environmental requirements. This includes complying with all environmental justice, National Environmental Policy Act (NEPA), and environmental review requirements.

R1 and any project partners or contractors will not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct property for a project under this Notice of Funding Opportunity (NOFO), or commit or expend HUD or non-HUD funds for such activities under this NOFO, until HUD has completed the environmental review procedures required by 24 CFR part 58 and the environmental certification and Request for Release of Funds (RROF) have been approved or HUD has performed an environmental review under 24 CFR part 50 and the recipient has received HUD approval of the project. R1 will not take choice limiting actions or commit grant funds before approval of Request for Release of Funds.