



City of Jackson

Department of

Neighborhood & Economic Operations



Consolidated Annual Performance and Evaluation Report

2011-2012 Community Development Block Grant (CDBG)

~and~

HOME Investment Partnerships Program (HOME)

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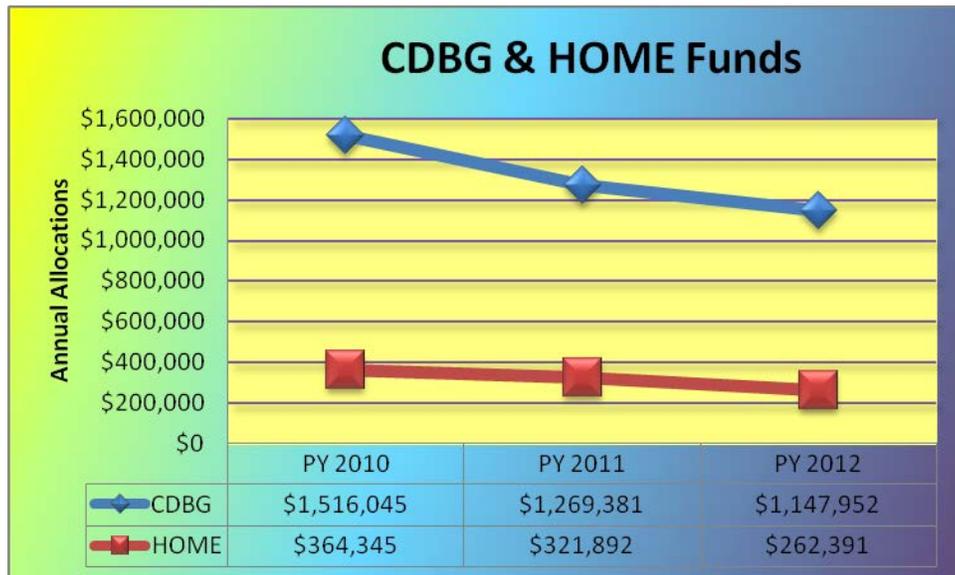
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Executive Summary

This Consolidated Annual Performance and Evaluation Report (CAPER) will cover those Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) activities undertaken by the City of Jackson or one of its subrecipients during the 2011-2012 fiscal year (FY). It will provide information regarding each program’s strengths and weaknesses, as well as specific project accomplishments and ways the programs can be improved.

The City of Jackson is an entitlement community and has been since the inception of the CDBG program in 1975 and a participating jurisdiction with the HOME program since 1991. The City remains committed to meeting community needs of providing decent, safe, and sanitary affordable housing, improving the living conditions of its low- and moderate-income residents, and expanding the economic opportunities in the community.

The City’s current Five-Year Consolidated Plan is in place for the period of 2010-2015; 2011 marked the second year of that Plan. The period covered by this CAPER, July 1, 2011 to June 30, 2012, saw a reduction in formula allocation in both CDBG (16.3%) and HOME (11.7%) funds from 2010 levels. Although not covered in this CAPER, 2012 formula allocations were further reduced from 2011 levels by 9.6% in CDBG and 18.5% in HOME funds. When compared to 2010 levels, CDBG funds available to the City of Jackson have been reduced by 24.3% and HOME funds by 28%. This sudden, sharp reduction in grant funds to the community has resulted in serious reconsideration of priorities.



During Program Year (PY) 2011, the Mayor, City Manager and Deputy City Manager developed and initiated the “Jackson Overall Economic Stabilization” (JOES) program. The strategic plans revolve around

- Reducing the supply of vacant, abandoned, dilapidated housing through demolition, thereby increasing demand;
- Increasing code enforcement, such as rental inspections and blighting violations, implementing a non-owner occupied residential property registry and a foreclosed, vacant and abandoned residential property registry, and exploring the feasibility of a point of sale ordinance;

- Increasing zoning enforcement to curb illegal uses in all zoning districts, especially in the one- and two-family residential districts;
- Exploring viable waste disposal plans, including metro garbage and recycling options;
- Supporting homeownership and single family reversions through strategic rehabilitation and limited new construction where practical;
- Managing and right-sizing public infrastructure assets.

The initial phase of JOES will concentrate on removing the overabundance of vacant, abandoned, dilapidated housing while providing rehabilitation and limited new construction opportunities to maintain and increase homeownership. In July 2011, City inspectors began an intensive data-gathering project of assessing vacant housing conditions and estimating rehabilitation costs with a standardized pricing schedule. City staff has revised several ordinance sections to the Housing, Building and Zoning codes to include a non-owner occupied residential property registry (NOORPR), a foreclosed, vacant and abandoned residential property registry (FVARPR), and to establish more stringent demolition and building standards.

On June 26, 2012, City Council approved re-naming the “Department of Community Development” to the “Department of Neighborhood & Economic Operations.” This name change was made as a result of a re-structuring of City Departments to provide a cost savings measure to the City by eliminating several department heads and combining departments. The Department of Neighborhood & Economic Operations includes Community Development, Planning, Economic Development, Engineering, Inspection and the Administrative Hearings Bureau.

Public Services

City Council was faced with challenging decisions to make with PY 2011 allocations because of the significant reduction in grant funds received by the City. Very serious considerations were made concerning the level of public service to support and still achieve the goals and objectives of the City and the Consolidated Plan. Many community service organizations received no or greatly reduced financial assistance, impacting the clientele they serve. However, many of the same community service providers were able to obtain other financial resources in order to further their missions.



Funding was allocated to entities that provided guidance to area youth through summer programs, emergency adult dental care, information and referral services, and utility assistance. The Aware Shelter, an emergency shelter for sexual assault and domestic violence victims, also received financial support for its client advocates. By supporting these agencies with CDBG funds, the low- and moderate-income persons living in the City were able to access and utilize services they may not have been able to afford on their own.

Code Enforcement and Rehabilitation

From July 1, 2011 through June 30, 2012, the Neighborhood & Economic Operations Department continued its efforts to provide decent, safe, affordable housing through its rental inspection and rehabilitation programs. In addition, enforcement of the City's blight ordinances provided a more suitable living condition in its residential neighborhoods.

Inspectors in the Neighborhood & Economic Operations Department issued 1,455 garbage citations, 215 inoperable vehicle citations, and 184 tree citations. Property owners receiving a violation notice overwhelmingly continued to voluntarily rectify the situation; however, those choosing to ignore the citations were issued a Violation and Notice of Hearing mandating their appearance at the City's Administrative Hearings Bureau (AHB).

Due to the initiation of JOES, a hiatus was placed on rental inspections for most of 2011 to allow inspectors the time required to evaluate over 800 vacant residential properties. Inspectors still responded to tenant complaints about rental housing conditions, but, for the most part, new systematic inspections of rental housing were put on hold. However, anticipated revenue from the advent of the NOORPR and FVARPR will allow the City to hire additional inspectors and support staff. A significant increase in code enforcement and rental housing inspections is expected to be reported in the 2012 CAPER.

If housing code compliance was not achieved within 90 days of the initial inspection and the property owner was making progress but needed additional time, they had an opportunity to appeal to the Building Code Board of Examiners and Appeals (BCBA) for an extension of time to complete repairs. Among other mitigating factors, should the property owner choose not to present their case before the BCBA, or if hazardous conditions remained, such as smoke detectors not being installed by the first reinspection, a Violation and Notice of Hearing was issued requiring an appearance at the AHB. During FY 2011-2012, 70 AHB cases involving rental housing were initiated.

The City's Housing Rehabilitation Program completed 11 rehabilitation projects and 12 emergency hazard cases during FY 2011-2012. Three additional rehabilitation projects and one emergency hazard cases were initiated but not completed before June 30, 2012 and are currently in progress.

Other Projects

The John George Home, a home for 35 elderly, indigent men, received funding to replace the zone valves in their antiquated heating system. The upgrade will allow residents to better control the temperature in their individual rooms and is expected to save the John George Home significant utility costs.

The City's Engineering Department completed reconstruction of Loomis Street from Leroy to Argyle, Wilkins Street from Greenwood to Francis, and Mason Street from Mechanic to Francis. Each of these projects included the addition of handicap curb ramps at intersections and/or where feasible to provide unrestricted access to the elderly and disabled populations. During winter months, the Engineering Department developed designs, specifications, bids and contracts for street reconstruction (with watermain replacement) on Forest Street from the west bend to Edgewood and Homewild Avenue from Ellery to Edgewood.

A companion allocation was awarded to the City’s Department of Public Works (DPW), which installed 6 sidewalk handicap curb ramps in 3 intersections during 2011-2012. The continuation of this project fits with requirements of 28 CFR 35.150(d)(2). DPW staff responded to a request from a disabled resident who lived in a neighborhood and required improved mobility.

Summary of Resources and Distribution of Funds

During the reporting period of July 1, 2011 through June 30, 2012, the following funds were made available from the U.S. Department of Housing and Urban Development (HUD) to the City of Jackson:

Community Development Block Grant	\$1,344,381
Entitlement Grant B-11-MC-26-0021	\$1,269,381
Program Income.....	\$ 75,000
HOME Investment Program	\$560,456
Entitlement Grant M07-MC260214	\$321,892
Reprogrammed Funds	\$238,564
Total:	<u>\$1,904,837</u>

CDBG funds were allocated as follows:

Activity	Amount	Approx. %
Public Services	\$118,954	8.9%
Administration & Planning	205,000	15.2%
Code Enforcement	514,000	38.2%
Jobs Creation Initiative	20,000	1.5%
Rehabilitation	158,427	11.8%
Public Infrastructure Improvements	<u>328,000</u>	<u>24.4%</u>
Total:	<u>\$1,344,381</u>	<u>100.0%</u>

HOME funds were allocated as follows:

Activity	Amount	Approx. %
Rehab Assistance	\$144,017	25.7%
New Construction	75,000	13.4%
CD Administration	32,189	5.7%
CHDO Operating Costs	16,000	2.9%
Acquisition/Rehab/Resale (City)	240,000	42.8%
Acquisition/Rehab/Resale (CHDO)	<u>53,250</u>	<u>9.5%</u>
Total:	<u>\$560,456</u>	<u>100.0%</u>

Budget amendments made during the reporting period allowed for the redistribution of funds from entities that had not expended or rescinded allocated funds for their projects, and program income received in excess of the amount originally budgeted, allowing the City to assist other CDBG or HOME eligible activities. Those budget amendments were as follows:

CDBG

Date	Description	Amount
1/10/2012	Reallocate Code Enforcement salaries and fringes to City Attorney Code Enforcement	\$15,000
2/21/2012	Reallocate unexpended Street Project funds to a different Street Project	26,041

HOME

Date	Description	Amount
5/29/2012	Reallocate Rehabilitation Assistance Program funds to new City activity of Acquisition/Rehabilitation/Resale	\$240,000
6/12/2012	Reallocate Rehabilitation Assistance Program funds to New Construction	40,000

A complete listing of the funds committed during the reporting period and the total amount expended appears below.

Agency Receiving Funds	Allocated	Expended	Percentage
CDBG			
Aware, Inc.	\$ 5,500	\$ 5,500	100.0%
Center for Family Health	10,000	10,000	100.0%
MLK Center Summer Program	40,000	40,000	100.0%
The Salvation Army	55,954	55,954	100.0%
United Way 211 Call Center	7,500	7,500	100.0%
Neighborhood & Economic Operations – Administration	205,000	91,229	44.5%
Neighborhood & Economic Operations - Code Enforcement	485,000	388,389	80.1%
Neighborhood & Economic Operations – Jobs Creation	20,000	0	0.0%
Neighborhood & Economic Operations - Rehabilitation	145,927	0	0.0%
City Attorney – Code Enforcement	29,000	25,617	88.3%
Dept. of Public Works	10,000	1,174	11.7%
Engineering – Street Paving/Reconstruction	303,000	19,603	6.5%
Forestry	15,000	15,000	100.0%
John George Home	12,500	0	0.0%

Agency Receiving Funds	Allocated	Expended	Percentage
HOME			
Community Action Agency - CHDO Reserve	\$53,250	\$ 0	0.0%
Community Action Agency - CHDO Operating Costs	16,000	0	0.0%
Habitat for Humanity – New Construction	75,000	13,706	18.3%
Neighborhood & Economic Operations – Rehabilitation	144,017	3,165	2.2%
Neighborhood & Economic Operations – Administration	32,189	32,189	100.0%
Acquisition/Rehabilitation/Resale (City)	240,000	59,420	24.8%

General CAPER Narratives

Assessment of the Five-Year Goals and Objectives

The 2010-2014 Five-Year Consolidated Plan listed five high priority goals to guide funding decisions:

- 1) Rehabilitation of owner-occupied housing.
- 2) Code enforcement.

- 3) Local street improvements.
- 4) Other public facility/infrastructure improvements.
- 5) Economic development activities.

Examining each priority separately, information is provided below:

Priority 1 – Rehabilitation of Owner-Occupied Housing

Neighborhood & Economic Operations rehabilitation staff remains committed to supplying emergency hazard and rehabilitation loans to homeowners choosing to remain in their current housing. In addition to CDBG and HOME funded rehabilitation projects, staff has been involved with the evaluation of vacant housing to determine the feasibility of rehabilitation versus demolition.

The Five-Year Consolidated Plan designated a local target area in which to focus a portion of its CDBG and HOME funds. This area is called “West of Allegiance Health” and is bordered by Cooper Street to the west, North Street to the north, Waterloo Street to the east and East Michigan Avenue to the south. During PY 2011, 261 homeowners in the target neighborhood were mailed information regarding the City’s rehabilitation program and were invited to apply for a rehabilitation loan. Staff received little response and no rehabilitation projects from the effort.



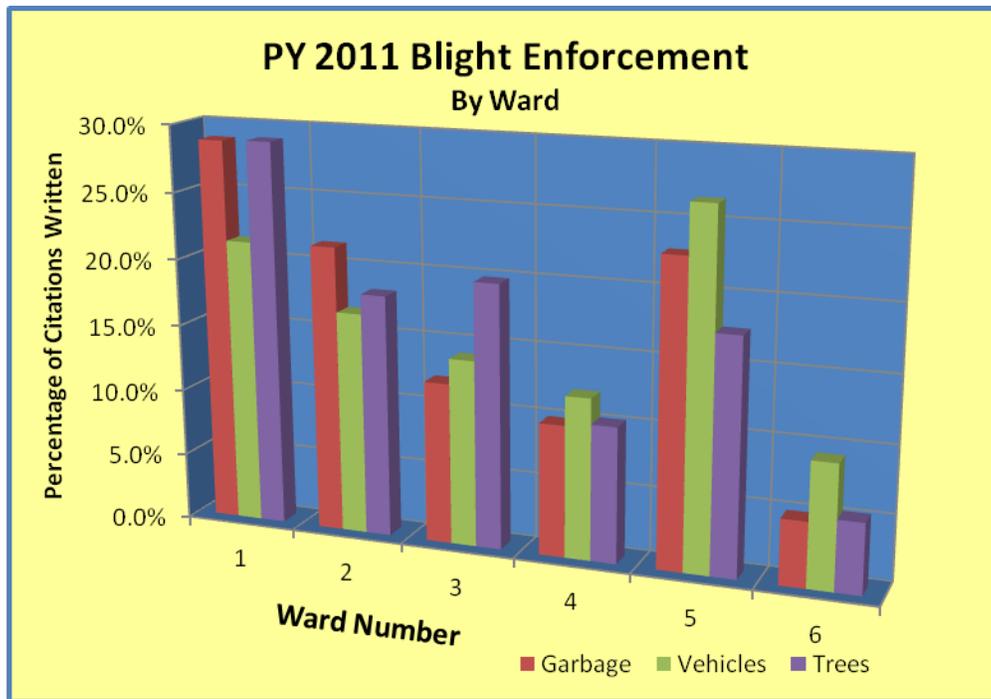
Since 2010, the City has completed 56 rehabilitation projects, funded as follows:

Year	No. Cases	CDBG Funds			Total
		Reg. Rehab	Emerg. Hazard	HOME	
36	33	\$ 99,236	\$119,308	\$219,961	\$438,505
37	23	30,947	75,402	288,539	394,888
Total:		\$130,183	\$194,710	\$508,500	\$833,393

As of June 30, 2012, the City had an additional three rehabilitation and one emergency hazard projects in process, which will be completed early in the 2012-2013 fiscal year.

Priority 2 – Code Enforcement

Neighborhood cleanliness remained a high priority for City inspectors during PY 2011. Although the number of blight citations were down slightly from PY 2010 levels, due in part to the retirement of one inspector and the amount of time invested by inspectors to commence the evaluations of over 800 vacant residential structures and 1,400 vacant lots, neighborhoods were positively impacted from efforts to keep properties tidy either by voluntary compliance or City intervention.

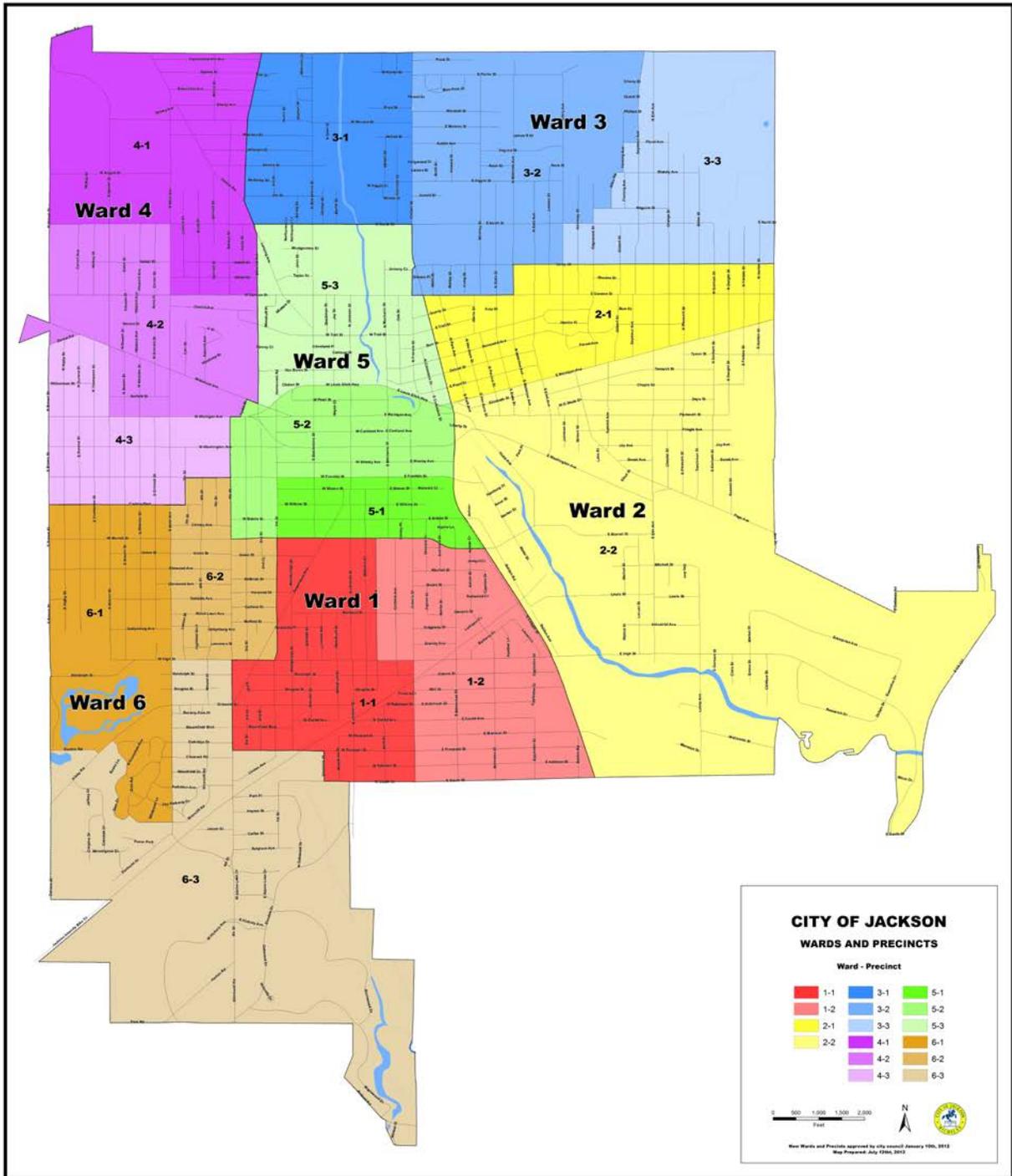


City inspectors continued with blight ordinance enforcement activity, citing homeowners for garbage, trash and debris; inoperable or unlicensed vehicles; and dead, diseased, dying or dangerous trees. More often than not, property owners voluntarily complied with the citations and removed or eliminated the violations, requiring no further action from the City.

As demonstrated in the graph above, Wards 1, 2 and 5 received the most blight citations, which directly correlates to the City's most distressed neighborhoods. These areas experience the highest poverty rates, higher rental-to-homeowner properties, high vacancy rates, and high density rates, among other factors. Wards 1, 2 and 5 also have the highest number of vacant, dilapidated housing in the City with higher than City-wide averages of housing rehabilitation estimates.

Ward	Number of Citations Written			Total	
	Garbage	Vehicles	Trees	Number	Percent
1	420	46	54	520	28.0%
2	314	36	34	384	20.6%
3	176	30	37	243	13.1%
4	145	26	19	190	10.2%
5	332	57	33	422	22.7%
6	71	20	10	101	5.4%
Total:	1,458	215	187	1,860	100.0%

When violations remained at reinspection, those matters were brought before the City's Administrative Hearings Bureau (AHB) where final resolution was achieved through eventual compliance or with the homeowner being defaulted. Further, the Administrative Hearings Officer assessed fines and costs in most instances as penalty for not bringing the code violations into compliance voluntarily.



projects are expected to begin about August 20, 2012 and be completed before the end of October 2012. In addition to CDBG funds, the City will also invest Water Fund resources to complete these projects. As with all street reconstruction projects, ADA-compliant handicap curb ramps will be installed in the sidewalks at all intersections.

Priority 4 – Other Public Facility/Infrastructure Improvements

In addition to handicap curb ramps installed during street reconstruction, the City continued to allocate CDBG funding to stand alone curb ramp installation projects. During PY 2011, the Department of Public Works installed six handicap curb ramps, two at each of the following intersections: Detroit and Perrine, Homewild and Park, and Homewild and VanDorn. These installations were completed in response to a request from a disabled resident in the neighborhood to improve accessibility to businesses in the area.

Toward the end of PY 2010, the Forestry Department was dissolved after the departure of the superintendent and combined with the Department of Public Works. Funds were fully expended by June 30, 2012 by contracting for the removal of 110 dead, diseased, dying or dangerous Ash trees, and using force account labor to grind the stumps and begin planting replacement trees. Alternate, hardy tree species were used during replanting, including maple, linden, elm and locust varieties.

Priority 5 – Economic Development Activities

During the allocation process for PY 2011 funds, the City was under interim leadership with no Neighborhood & Economic Operations director in place. Although no specific project was identified, City Council allocated \$20,000 in CDBG funds to the City's Jobs Creation Initiative loan program. Since that time, new leadership was installed and Jackson's Mayor, City Manager and Deputy City Manager have designed and implemented an aggressive vision to turn Jackson's economy around. With approximately one year of planning and data gathering behind the Jackson Overall Economic Stabilization (JOES) program, City staff has completed over 800 rehabilitation estimates on vacant housing, approximately 1,400 evaluations of vacant land throughout the City, and substantial ordinance revisions related to housing, building standards, demolitions and zoning.

While no special economic development activity is available to report on during PY 2011, it should be noted that all CDBG and HOME funds received by the City provide an economic impact to the community in some fashion. Public service dollars provide assistance a low- to moderate-income resident may not be able to afford, and may also provide an entity funding to retain employees. Rehabilitation funds allow a low-income homeowner to afford to maintain their home, freeing up income to pay bills, purchase food and clothing, and also allow a contractor to keep its employees working. CDBG also pays for all or a portion of certain public employees, and creates jobs in the community through public infrastructure improvements.

Jackson has historically been a manufacturing community, with an emphasis on production of auto parts. The top four industry categories for civilian employed City population 16 years and over remain unchanged from the 2000 Census data; however, manufacturing no longer leads the group. The 2008-2010 American Community Survey estimates manufacturing fell from 23.7% to 21.8% of employed city workers while educational, health and social services rose from 20.3% to 24.2%.

2000 Census	
Industry	Percent
Manufacturing	23.7%
Educational Services, Health Care, and Social Assistance	20.3%
Retail Trade	11.9%
Arts, Entertainment, Recreation, Accommodation, and Food Services	10.5%
Professional, Scientific, Management, Administrative, and Waste Management	5.9%
Other Services (except Public Administration)	5.7%
Public Administration	4.7%
Construction	4.5%
Transportation, Warehousing, and Utilities	4.0%
Finance, Insurance, Real Estate, Rental and Leasing	3.7%
Wholesale Trade	3.1%
Information	1.8%
Agriculture, forestry, fishing, hunting, and mining	0.2%

2008-2010 American Community Survey	
Industry	Percent
Educational Services, Health Care, and Social Assistance	24.2%
Manufacturing	21.8%
Retail Trade	12.2%
Arts, Entertainment, Recreation, Accommodation, and Food Services	11.8%
Public Administration	6.6%
Professional, Scientific, Management, Administrative, and Waste Management	5.5%
Other Services (except Public Administration)	4.4%
Finance, Insurance, Real Estate, Rental and Leasing	4.0%
Transportation, Warehousing, and Utilities	2.9%
Construction	2.6%
Information	2.0%
Wholesale Trade	1.8%
Agriculture, forestry, fishing, hunting, and mining	0.1%

Source: Table DP-3 from 2000 Census and 2008-2010 American Community Survey

The City of Jackson’s average jobless rate for Program Year 2011 was 12.8%, with a high of 15.7% in July 2011 to a low of 11.2% in April 2012. Comparatively, Jackson County averaged 8.9%, the State of Michigan 9.6%, and the United States 8.4% during this same timeframe. While unemployment is still a major concern among City residents, the 12.8% average was 3.5 percentage points lower than Program Year 2010’s average jobless rate. Unfortunately, economic recovery cannot necessarily be assumed because unemployment percentages have fallen. The Bureau of Labor Statistics (BLS) defines unemployment as people who “do not have a job, have actively looked for work in the prior four weeks, and are currently available for work.” Most people leave the labor force when they retire, go to school, have a disability that keeps them from working, or have family responsibilities. Others may feel they can’t get work so stop looking and are then classified as discouraged workers and the BLS removes them from both the unemployment statistics and labor force.

In the coming months, it is anticipated the City will hire an employee totally devoted to economic development opportunities. It is also expected that the City’s CDBG-funded Jobs Creation Initiative loan program will be offered as an incentive for potentially viable economic development ventures in the community.

Medium Priority Activities

Nearly all medium priority activities conducted during PY 2011 involved community service providers. CDBG funds were used to assist the City of Jackson’s disadvantaged youth through the Martin Luther King Center Summer Recreation Program which, in addition to arts and crafts, swimming lessons and other sports clinics and camps, youth were given peer pressure practice, life skills training and cultural diversification trips.

Low- and moderate-income adults were provided improved access to such services as:

- Emergency dental care through the Center for Family Health.
- Utility shutoff prevention through The Salvation Army, which prevented 48 families from becoming homeless.
- Information and referral services through the United Way's 211 Call Center.

The Aware Shelter, Jackson's only emergency shelter for domestic violence and sexual assault survivors, utilized CDBG funding to assist with client advocate staffing. Aware's client advocates provide 24-hour intake, crises call, and support services to client survivors.

City Council also continued to financially support the ongoing rehabilitation of 1501 East Ganson Street, which houses the John George Home, a multi-unit facility for elderly, indigent gentlemen. During PY 2011, the John George Home was able to replace the zone valves on 63 individual registers, allowing residents and staff to regulate the heat in winter, which had been running too high. Not only will the residents be more comfortable, but the John George Home anticipates saving money through lower utility bills.

The City of Jackson received \$2,785,426 in CDBG funding since 2010 and, together with anticipated program income of \$175,000, has allocated said funds toward its stated priorities as follows:

High Priority

1 – Rehabilitation of Owner-Occupied Housing	\$ 331,927
2 – Code Enforcement	1,080,345
3 – Local Street Improvements	658,000
4 – Other Public Facility/Infrastructure Improvements.....	59,000
5 – Economic Development Activities	70,000

Medium Priority

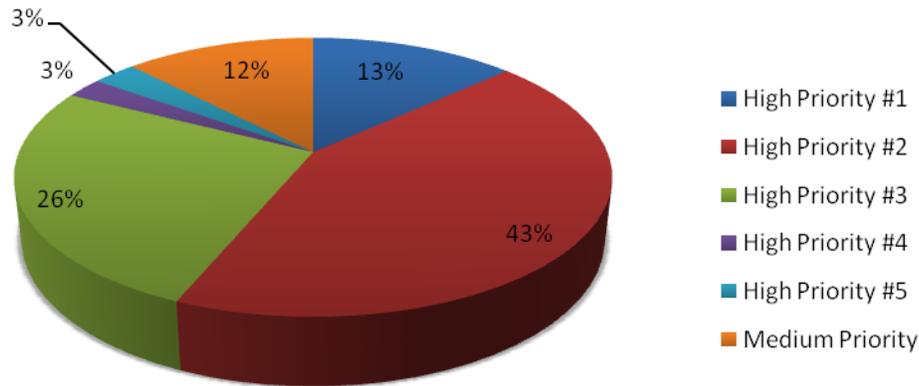
Public Services.....	\$283,954
Rehabilitation of Multi-Unit Senior Housing.....	22,500

Through budget amendments reallocating funds from projects that came in under budget, canceled projects, or budgeting program income, the City was able to provide additional funding towards its priorities as follows:

High Priority

Code Enforcement	\$15,000
Local Street Improvements.....	26,041

Funded Activities



Certain 2011 funded projects and activities needed additional time to complete; others were completed by June 30, 2012 but project accomplishments could not be entered into HUD's Integrated and Disbursement Information System (IDIS) until after July 1, 2012.

CDBG

Subrecipient	Balance	Plans to Rectify
Aware	\$ 0	Project complete
The Salvation Army	0	Project complete
City Attorney's Office	3,383	The City Attorney's Office received a continuing allocation for Year 38 (2012-2013); 2011 balance will be expended before the end of the first quarter.
John George Home	12,500	Project complete; compiling Davis-Bacon information. Upon approval, final reimbursement request will be processed.
Department of Public Works (DPW) – Handicap Curb Ramps	8,286	Remaining funds carried over to FY 2012-13.
Engineering – Street Paving/Reconstruction	283,397	Remaining funds carried over to FY 2012-13.
Neighborhood & Economic Operations – Administration	113,771	Continuing to spend down prior year funding; remaining funds carried over to FY 2012-13.
Neighborhood & Economic Operations - Code Enforcement	96,611	Continuing to spend down prior year funding; remaining funds carried over to FY 2012-13.
Neighborhood & Economic Operations – Jobs Creation Initiative	20,000	Remaining funds carried over to FY 2012-13.
Neighborhood & Economic Operations - Rehabilitation	145,927	Continuing to spend down prior year funding; remaining funds carried over to FY 2012-13.

HOME

Subrecipient	Balance	Plans to Rectify
Neighborhood & Economic Operations – Rehabilitation	\$140,852	Continuing to spend down prior year funding; remaining funds carried over to FY 2012-13.
CAA – CHDO Reserve	53,250	Remaining funds carried over to FY 2012-13.
CAA – CHDO Operating	16,000	Remaining funds carried over to FY 2012-13.
Habitat for Humanity – New Construction	61,294	Remaining funds carried over to FY 2012-13.
Neighborhood & Economic Operations – Acquisition/Rehabilitation/Resale	180,760	Remaining funds carried over to FY 2012-13.

Affirmatively Furthering Fair Housing

The City of Jackson’s fair housing ordinance is outlined in Chapter 14, Article IV, Sections 14-131 through 14-140, City of Jackson Code of Ordinances, and prohibits discrimination in sale, lease or rental of real property because of an individual's religion, race, color, national origin, age, sex, marital status, handicap or source of income. Provisions are made in each CDBG Subrecipient Agreement or HOME Contract that the recipient must comply with fair housing and equal opportunity laws.

The City’s Analysis of Impediments to Fair Housing Choice was updated and received by the City Council in early 2010. Impediments were identified in the Analysis as including, but not limited to:

- Lack of resources/developers to create more affordable or low-income housing.
- Urban food deserts, which is the lack of grocery stores in low- and moderate-income areas. Residents oftentimes rely on local convenience stores, which generally charge significantly more for an identical item found cheaper in a large grocery store. This also greatly reduces the availability of fresh produce, meat, and bakery items.
- Lack of local banking establishments in low- and moderate-income areas – residents again often rely on convenience stores to cash checks and are either charged a sizeable fee for the service, or are required to purchase a certain amount of goods from the store before it will cash the check.
- Landlords who monopolize available housing. Tenants feel they are in a Catch-22 – if they complain to the landlord, their complaint goes ignored; if they complain to the City, they risk the chance of becoming homeless should conditions exist that pose a health and safety hazard for the tenant; landlords may retaliate for complaints made by initiating eviction.
- Landlord foreclosures – tenants are rarely given adequate advance notice to find alternate housing.
- Not In My Back Yard (NIMBY) – opposition by residents to a proposal for a new development near them.
- Lack of housing for working poor (middle income) – those persons who work every day and barely make ends meet, but do not qualify for assistance from the Department of Health and Services, food stamps, childcare, etc.
- Lack of a local fair housing organization to investigate complaints and offer educational opportunities.
- Lack of jobs available for low- and moderate-income persons in which the potential employee may be able to perform, but is lacking the required experience.
- Lack of affordable and convenient transportation.

Below is the Summary of Recommendations contained in the Analysis of Impediments with notes added to describe steps taken to address and remove the impediments:

Alleviate Identified Impediments to Fair Housing Choice - opportunities to alleviate or eliminate the impediments identified in the Analysis should be given high consideration, whether it is by providing a specific service or supporting community partners who are better able to address the issues.

Note: No applications for CDBG funding have been received which alleviate or eliminate the identified impediments.

Provide Financial Support to Fair Housing Activities – City Council is advised to consider annual CDBG allocations to the Fair Housing Center of Southeastern Michigan to reinstate fair housing activities of education, complaint receipt, testing, investigation, and potential enforcement of Chapter 14, Article IV, Sections 14-131 through 14-140, City of Jackson Code of Ordinances.

Note: The Fair Housing Center of Southeastern Michigan applied for \$20,000 in CDBG funds for Program Year 2010. City Council considered the application but elected not to fund the program based on the amount of annual formula allocation received. City administrative staff indicated it had identified unspent prior year program funds that could be allocated toward the project, but a budget amendment was never approved. No further applications for funding have been received from the Fair Housing Center of Southeastern Michigan; no fair housing center exists specifically to address Jackson County needs.

Update Fair Housing Ordinance – City Council is advised to direct the language used in the City of Jackson’s Fair Housing Ordinance, Chapter 14, Article IV, Sections 14-131 through 14-140, City of Jackson Code of Ordinances, be updated to be more reflective of current terminology used for gender and diversity.

Note: The Jackson City Council approved two amendments to Chapter 14 Housing Code during PY 2011. One such amendment, which was adopted on February 21, 2012, included revisions to Article IV to be more reflective of current terminology.

Fair Housing Law Promotion – The Neighborhood & Economic Operations Department is advised to enhance its Fair Housing promotion by including a statement on housing code inspection compliance certificates.

Note: Overall revisions to housing code inspection compliance certificates have been discussed, which would also include the following language:

The City of Jackson prohibits discrimination in the sale, lease or rental of real property based on an individual's religion, race, color, national origin, age, sex, marital status, handicap or source of income.

At this time, revisions to the compliance certificates have not been implemented.

Neighborhood Revitalization – City Council is advised to place high importance on continued efforts to improve the Neighborhood Stabilization Program (NSP) Target Neighborhood after NSP grant funds have been expended to provide additional enhancement to this distressed area of the

City. Medium importance should be placed on continued financial support to the Partnership Park Downtown Neighborhood as significant investment and revitalization has already occurred.

Note: The City's 2010 – 2014 Five-Year Consolidated Plan identified a target area which expanded on the City's NSP Target Neighborhood. The CDBG Target Area and Partnership Park Downtown Neighborhood will be included in implementation of the City's JOES program currently developing. As stated previously, a mass mailing to homeowners in the CDBG Target Area occurred early in 2012 informing homeowners of the City's rehabilitation program and encouraging them to participate.

Transportation - The City is advised to continue, and possibly expand, its participation in various boards, committees and study groups dedicated to improving public transportation in the community.

Note: City staff continues to be involved in boards, committees and study groups dedicated to improving public transportation.

Continued Financial Support for Housing Programs - City Council is advised to maintain, and possibly enhance, financial support from its entitlement grants toward programs designed specifically for housing. Such programs include homeownership counseling, foreclosure prevention, down payment assistance, rehabilitation of housing, and construction of new housing.

Note: City Council continued providing funding for homeowner rehabilitation, emergency hazard, and acquisition/rehabilitation/resale projects.

Inquiries to the Fair Housing Center of Southeastern Michigan as to Fair Housing activity in Jackson County during PY 2011 went unanswered.

Affordable Housing

Foster and Maintain Affordable Housing

During fiscal year 2011-2012, the City continued to provide a rehabilitation program for owner-occupied, low-income households who are unable to access home improvement loans through traditional lenders for repairs. Emergency hazard loans of up to \$10,000 were made available to qualifying households to repair an immediate, urgent need, such as an inoperable furnace in the winter, a leaking roof during the rainy season, etc. These programs offer loans, rather than grants, ensuring future funding from program income will be available to assist another low-income family. The Community Action Agency received an allocation of HOME funds to serve as the City's CHDO and plans to acquire and rehabilitate housing to resell to a low- to moderate-income family.

Preserving Decent, Affordable Rental Units

In order to protect the health, safety and welfare of area tenants, the City's Code Enforcement program takes a proactive stance on the City's rental housing by systematically inspecting all rental units in a designated area. During FY 2011-2012, rental housing inspections were greatly reduced as inspectors participated in the data gathering required to initiate JOES. However, anticipated revenue from instituting two residential property registries will allow the City to hire four to five more inspectors to enhance rental inspections and blight ordinance enforcement. All complaints made by tenants were investigated and proper corrective measures were required of landlords.

After the initial inspection by a Code Enforcement Officer, landlords are given no less than 30 days nor more than 90 days within which to bring any non-emergency violations noted up to code per Chapter 14 of the City of Jackson Code of Ordinances. The Building Code Board of Examiners and Appeals may extend the time limit set for correction of violations if the owner can show a good faith effort to comply with the repair order. Non-compliance cases are prosecuted through the City’s Administrative Hearings Bureau.

Eliminate Barriers to Affordable Housing

With the advent of JOES, specifically starting at the neighborhood level of evaluating vacant and abandoned housing, it has become quite clear a lack of sufficient resources is the biggest deterrent to affordable housing in the City of Jackson. During the past 40 years, the City’s population has decreased 40% while housing units are only 1.8% less now than in 1970. This has led to an overabundance of aged housing stock, 85% of which was built before 1970. Many of the homes have suffered from owners or landlords having insufficient funds or abilities to properly maintain them, leading to an excess of housing well beyond the feasibility of rehabilitating.

After estimating the rehabilitation costs of over 800 residential structures, the City is able to document the average cost to rehabilitate its aged housing stock is \$67,634. However, when reviewed on a Ward by Ward basis, the average cost to rehabilitate vacant housing is as follows:

Ward	Avg Cost	Ward	Avg Cost
1	\$75,280	2	\$69,140
3	\$43,443	4	\$42,457
5	\$122,803	6	\$41,077

The total cost to rehabilitate 804 vacant residential structures in the City of Jackson exceeds \$54 million, many of them so cost prohibitive to elevate from a substandard level it is more economical to demolish the same structures at a cost of \$9.8 million. In either case, the City lacks sufficient resources to take full corrective measures; however, over the coming years, it plans to invest more wisely in rehabilitation and new construction efforts and demolish dilapidated structures as funding allows.

With consistently high unemployment, low income, and an ever shrinking safety net, many of the community’s residents struggle with multiple issues besides housing. Because the need is much greater than the City can provide for, gaps are filled to the extent feasible by non-profit and faith-based entities. While this alleviates some demands, it still is not great enough to assist everyone, nor provide a cure to the problems.

Address Accessibility Needs of Persons with Disabilities

On August 15, 2006, the Jackson City Council took action to waive the permit fees for work performed by local non-profit charitable organizations, specifically for handicap-accessible ramps. Since that time, nearly 100 ramps have been installed for disabled homeowners by disAbility Connections, the Rotary Club, World Changers and Mission Serve. The City’s Department of Public Works responds to suggestions for improved accessibility by disabled and elderly residents by installing handicap curb ramps in requested locations.

Continuum of Care

The Jackson County Continuum of Care (CoC) receives annual allocations of Emergency Solutions Grants (ESG) from the Michigan Housing Development Authority (MSHDA). The CoC most recently allocated \$166,638 in funding through September 30, 2012 as follows:

- \$ 8,250 to CAA to serve as Grant Fiduciary and fund the CoC Coordinator position.
- \$18,000 to CAA to serve as the Housing Assessment and Resource Agency.
- \$43,550 to CAA to provide short term rental assistance.
- \$13,200 to Do'Chas II to provide essential services to youth aging out of foster care.
- \$24,350 to The Salvation Army to payment of up to three (3) months' rent arrearages to prevent a family from becoming homeless.
- \$44,938 to AWARE, Inc. for operating expenses related to managing an emergency shelter for survivors of domestic violence and sexual assault.
- \$14,350 to Training & Treatment Innovations (TTI) for utility and/or rental arrearages.

Towards the end of June 2012, MSHDA announced an additional, one-time round of ESG funding, of which the Jackson CoC will receive \$123,745 through August 31, 2013. The allocation is required to be spent as follows: 12% on prevention financial assistance, 3% on prevention financial assistance case management, 60% on rapid re-housing financial assistance, 15% on rapid re-housing financial assistance case management, 3% for Homeless Management Information System database activities, and 7% for administration.

In December 2011, HUD announced the Jackson CoC would receive \$801,593 in renewal funding for the following supportive housing programs:

Garfield Square Project	\$190,243
Housing Advocacy Program Expansion	\$269,267
Jackson HMIS	\$ 54,932
Jackson Leasing Assistance Program	\$112,876
Jackson Leasing Assistance Program II	\$118,144
Partnership Park Permanent Housing	\$ 56,131

Supportive housing programs develop housing and related supportive services for persons moving from homelessness to independent living. Program funds are to be used to assist homeless people live in a stable place, increase their skills or income, and gain more control over the decisions that affect their lives. Supportive Housing Program funding from HUD is utilized by CAA, Aware, Inc. (in partnership with CAA) and TTI. The renewal grant award allows CAA to continue its two transitional housing programs, which help residents pay rent for up to two years, and for continued support of five housing units for homeless families in the Partnership Park neighborhood. All three programs assist approximately 60 families per year. A portion of CAA's funding also supports required data collection and reporting through the Homeless Management Information System (HMIS). TTI's grant funding supports its two leasing assistance programs.

City staff actively participates in the CoC as a co-chairperson and assisted in the planning and implementation of three Project Homeless Connect events between November 2009 and April 2011. In 2010, the CoC realized its original strategies and goals for ending homelessness in Jackson were not effective and, in light of the ongoing foreclosure crisis, high unemployment rate, and financial decline,

began to rework its strategic plan, action plan and 10 year plan. Goals identified by the strategic plan work group include:

- ✓ Build CoC activities by engaging volunteers interested in specific projects;
- ✓ Improve communication about CoC’s purpose and successful outcomes;
- ✓ Increase advocacy activities;
- ✓ Address unmet needs of target populations.

Beginning in the last quarter of 2010 CoC meetings included significant discussion of subpopulation needs, such as those experienced by domestic violence survivors, youth, elderly, veterans, and persons with dual diagnosis. All respective agencies serving specific subpopulation sectors reported a lack of resources as the greatest hindrance in providing the types of services and supports each group faces. CoC members are continuing in the planning process to develop an achievable action plan and amend the 10 Year Plan to incorporate and implement the modified visioning and elements of the HEARTH Act.

Following is the most recent information regarding shelter providers in the City:

2011 Continuum of Care Housing Inventory Chart

Emergency Shelters

Provider Name	Facility Name	Family Units	Family Beds	Individual Beds	Total Beds
AWARE, Inc.	AWARE, Inc.	6	22	8	30
Jackson Interfaith Shelter	Jackson Interfaith Shelter	9	45	32	77
Total:		15	67	40	107

Transitional Housing

Provider Name	Facility Name	Family Units	Family Beds	Individual Beds	Total Beds
AWARE, Inc.	Transitional Housing	19	41	3	44
CAA	HAP, Garfield	23	95	2	97
Do’Chas II	Transitional Housing	5	5	0	5
MPRI	Rental Assistance	0	0	25	25
Total:		47	141	30	171

Permanent Supportive Housing

Provider Name	Facility Name	Family Units	Family Beds	Individual Beds	Total Beds
CAA	Partnership Park	5	14	0	14
TTI	TTI	4	9	11	20
Total:		9	23	11	34

Other Actions

Address Obstacles to Meeting Underserved Needs

Among the greatest needs in the City involve transportation, jobs providing a living wage, and affordable, safe housing. Unfortunately, the lack of sufficient resources to meet these needs remains the greatest obstacle to overcome. With reduced grant funding from HUD, the City must rely on social services providers and the faith-based community to address these gaps. With the onset of JOES, the City anticipates Jackson’s economy will begin the long road to recovery.

Overcome Gaps in Institutional Structures and Enhance Coordination.

The City of Jackson administers the grants received from HUD used to carry out activities of the Five-Year Consolidated Plan and Annual Action Plan. City staff works with other organizations, including public institutions, non-profit organizations, and private industry and continues to strengthen relationships with agencies that provide services to Jackson’s low- and moderate-income residents. City staff has participated with United Way’s Income Community Solutions Team and the Jackson County Continuum of Care. The City encourages its citizens and business leaders to participate in all aspects of its programs and governing decisions. In addition to public hearings on specific issues, citizens are given time at the beginning of each City Council meeting to address the City Council on issues of concern to them. Through this citizen input, the City Council has developed alternative program plans to address concerns in some cases.

Improve Public Housing and Resident Initiatives

The Jackson Housing Commission (JHC) is the City’s Public Housing Authority (PHA). The JHC manages 539 units of public housing in three Asset Management Projects and a Section 8 program of 475 participants. The mission of the JHC is:

To assist low income families secure safe, decent and affordable housing; create opportunities for resident and participant families to achieve self sufficiency and economic independence; and assure fiscal and program integrity by all program participants.

To achieve the ideals contained in the mission statement, the JHC set goals and objectives of providing decent, safe and affordable housing; ensuring equal opportunity in housing for everyone; responding to resident requests for maintenance issues in a timely fashion; returning vacated units to occupancy within 25 days; continuing enforcement of its “One Strike” policy for residents and applicants; and improving and/or maintaining financial stability through aggressive rent collections and improved reserve position. The JHC’s financial resources include an operating fund, capital fund, dwelling rental income, and Section 8 administrative fees.

SECTION 8 BY THE NUMBERS	
\$2,625,924	Housing Assistance Payments
97%	Lease Up Rate
187	Landlords
461	Voucher Holder Participants
1,196	Individuals

After assessing the housing needs of the City and surrounding Jackson County area, JHC has determined that it currently meets, and will continue to meet, the housing needs of the community to the extent practical for a medium-sized agency. In addition, the JHC has:

- No plans to demolish any of its properties. In fact, the JHC plans extensive physical improvements at each location within the next three years. Comments and suggestions from the various Resident Advisory Boards (Shahan-Blackstone, Chalet Terrace, Reed Manor and Section 8) are taken into consideration and, if feasible, implemented.
- A HUD-approved Home Ownership Plan to sell 50 scattered site units to qualifying low- and moderate-income homebuyers. As of June 3, 2008, 10 units had been sold; however, when the

housing crisis affected the ability to sell homes, JHC discontinued this program and reconverted these single family homes back into rental units.

- Implemented local preferences to improve the living environment by de-concentration, promoting income mixing, and improving security throughout the developments.
- Created and continues to facilitate self-sufficiency programs to improve resident employability, as well as solicit support services for the elderly and families with disabilities.

PUBLIC HOUSING BY THE NUMBERS	
PERFORMANCE INDICATORS	
98%	Occupancy Rate
134	New Admissions
150	Youth Participated in Programs
4,332	Non-Emergency Work Orders Completed
1.8	Average # of Days to Complete Non-Emergency Work Orders
531	Emergency Work Orders
97%	Emergency Work Orders Completed within 24 hours
22 Days	Average Vacant Unit Turnaround
DEMOGRAPHICS	
2.0	Average Family Size
68	Elderly Heads of Household (Age 62+)
467	Non-Elderly Heads of Household (Age <61)
357	Female Heads of Household
178	Male Heads of Household
258	Disabled/Handicapped Heads of Household
248	Non-Minority Heads of Household
287	Minority Heads of Household
SOURCES OF INCOME	
1	Own a Business
22	Receive Child Support
2	General Assistance
1	Indian Trust/Per Capita
383	Other Nonwage Sources
15	Pension
166	SSI
181	Social Security
159	TANF (Formerly AFDC)
11	Unemployment Benefits
149	Other Wages
INCOME LEVELS	
455	Extremely Low
73	Very Low
7	Low
TIME ON PROGRAM	
100	<1 Year
91	<2 Years
58	<3 Years
60	<4 Years
29	<5 Years
197	<6 Years

The JHC receives funding from an annual allocation of Capital Funds Program for development, financing, modernization and management improvements to its three housing complexes and 40 scattered site units. The public housing complexes managed by the JHC are:

- Shahan-Blackstone North** – 119 units, 98% occupancy rate
- Reed Manor** – 296 units, 90% occupancy rate
- Chalet Terrace** – 124 units, 95% occupancy rate

CAPITAL FUND PROGRAM PROJECTS

2009 Capital Fund Program	
Chalet-Terrace	Interior Doors
Chalet-Terrace	Ranges and Refrigerators
Reed Manor	Elevators
PHA Wide	Telephones, Computers & Software

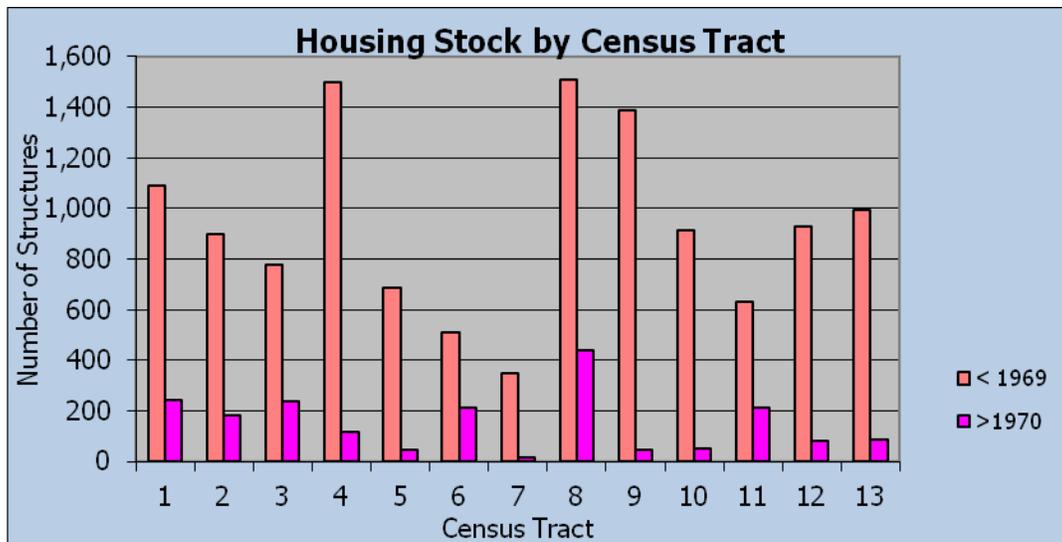
2010 Capital Fund Program	
Chalet-Terrace	Ranges & Refrigerators
Reed Manor	Exterior Lights
Reed Manor	Refrigerators
Reed Manor	Security
Reed Manor	Fob System & Call Boxes

2011 Capital Fund Program	
Reed Manor	Exterior Doors
Reed Manor	Security
PHA Wide	Small Business Computer Server
PHA Wide	Biometric Time Clocks

A resident member participates on the JHC Board, and four separate Resident Advisory Boards exist; one at each of the three complexes and one for Section 8. Due to Resident Advisory Board participation, the JHC incorporated certain requests into its annual and five-year plans and will address other requested items through normal operational activities that do not require use of Capital Funds.

Evaluate and Reduce Lead-Based Paint Hazards

According to the Michigan Department of Community Health (MDCH), environmental exposure to lead in amounts sufficient to cause illness and neurological damage in children remains a significant concern in Michigan. Jackson County has been identified as one of fourteen counties in Michigan at high risk for childhood lead exposure and poisoning. Lead-based paint hazards are a major concern for the City's young children and pregnant women as over 85% of all housing was constructed prior to 1970, with over 51% being built before 1940. As jobs continue to be scarce and families are trying to get by, property maintenance and repair are not high on the list of priorities. As properties decline, the risk of exposure to lead-based paint hazards increases. All 13 Census tracts in the City contain aged housing, as demonstrated below:



Housing built prior to 1978 (when federal law banned the use of lead-based paint in residential housing) is considered to be at risk of containing some amount of lead-based paint. The amount of lead pigment in the paint increases with the age of the housing. Housing built prior to 1950 remains a significant concern for lead poisoning as 1950 is often recognized as the “threshold” to lower levels of lead-based paint. Prior to about 1940, paint typically contained high amounts of lead, often 10 to 50 percent. In the early 1950s, paint industry standards voluntarily called for limiting lead content to 1%. With approximately 66% of the housing stock built prior to 1950, Jackson housing units pose a high risk of containing significant lead-based paint hazards. Young children of very low- and low-income households are most likely to reside in older housing, and are disproportionately at risk of lead poisoning. It is anticipated that units of owner occupied housing will continue to decline and the ratio of rental units will increase due to the stress of the slow and declining economy. Rental properties make up a large percentage of the City’s housing units. If units are not maintained, the risk of young children coming into contact with lead-paint hazards continues to climb.

Since HUD’s lead-based paint regulations took effect in September 2000, the City has seen rehabilitation costs increase by 60%. Unfortunately, the City’s funding sources did not increase at the same time, making it more and more difficult to have a significant impact on the housing in the community. Because of the age of the housing stock, the homes of all applicants for rehabilitation assistance living in homes built prior to 1978 must be tested for lead-based paint.

From 2006-2010, the City successfully implemented a Lead Hazard Control Program to address lead-based paint hazards in low-income homes built before 1978. The program tested 215 units and provided lead hazard remediation for 174 units. The purpose of the grant was to provide funds to low- and moderate-income families living in the City of Jackson and Jackson County to accomplish the national initiative to eliminate childhood lead poisoning. The program offered testing for lead-based paint hazards in the home, testing of young children under age six for elevated blood lead levels, and funding to remediate the lead-based paint hazards from the home. To implement this program, the City partnered with other community organizations to provide lead hazard control services to reduce the number of housing units containing lead-based paint hazards. These organizations included CAA, the Jackson County Health Department, and the Center for Family Health (Allegiance Health System).

The City partnered with the CAA to provide lead hazard control services to owner occupants living outside of the city limits and to rental property owners in the Partnership Park area. The Jackson County Health Department provided community education and outreach to families with children under the age of six and local organizations that service families with children under the age of six. The City partnered with the Center for Family Health to provide client referrals for blood lead testing of children under the age of six living in the home. The City also worked with the Jackson Area Landlord Association (JALA) to provide resources to rental property owners and educational information pertaining to childhood lead poisoning, renovating pre-1978 properties and the Michigan Lead Abatement Act. Although the City applied for renewal funding from the U.S. Department of Housing and Urban Development (HUD) in the fall of 2009 and again in the fall of 2010 to continue providing lead-based paint hazard control services, those applications were denied and the program ended in March 2010. With the lack of funding to continue lead-based paint hazard control services, the number of lead-safe housing units being created in the community will be impacted.

The City will continue to work with referrals from the Jackson County Health Department to identify clients with lead-based paint hazards that may be eligible for a full housing rehabilitation project. These clients will be able to address their lead-based paint hazards and probable code violations in the same project. The downside to this is the amount of funding available per client. Lead hazard remediation may be expensive and may impact the amount of housing projects that can be accomplished through the allocated funding. For families with a child identified as having an elevated blood lead level, the City will refer the family to the Michigan Department of Community Health's Lead and Healthy Homes Program. While the City of Jackson is not identified within the MDCH work plan as a subrecipient community, it does fall under their "statewide" clause of being allowed to provide assistance based on a child with an identified elevated blood lead level. This will provide some opportunity for families with a lead-poisoned child, but it will not aid in the prevention of childhood lead poisoning. The City will also utilize the MDCH's Lead and Healthy Homes Program to serve as a referral network to link local contractors to training and educational services for lead abatement certification as well as resources to become certified in the EPA's Renovate Right curriculum.

The State of Michigan has enacted legislation to address lead-based paint issues in the state. The City of Jackson and its subgrantees will continue to incorporate and comply with the Michigan Lead Abatement Act to address lead-based paint issues in the community. The City of Jackson and its subgrantees will also comply with the Federal Environmental Protection Agency (EPA)'s Renovation, Remodeling and Paint Law that took effect on April 10, 2010. This law will require contractors performing remodeling and renovation activities in residential properties and child occupied facilities built before 1978 to be certified and to follow specific work practices to prevent lead dust contamination.

Ensure Compliance with Program and Comprehensive Planning Requirements

Department of Neighborhood & Economic Operations staff responsible for oversight of the administration of CDBG/HOME funds perform the following functions, which includes, but is not limited to:

- Receiving applications for funding and reviewing same for eligibility.
- Performing a risk analysis of applicants requesting funds.
- Preparing reports for the City Manager, Mayor and City Council.
- Performing environmental reviews.
- Preparing the Five-Year Consolidated Plan, One-Year Action Plan, and Analysis of Impediments for submission to HUD, as required.

- Preparing Subrecipient Agreements to those entities receiving an allocation.
- Preparing the CAPER.
- Monitoring subrecipients: quarterly desk reviews and annual on-site reviews.
- Reviewing reimbursement requests for eligibility.
- Conducting site visits to projects while in progress.
- Conducting Davis-Bacon interviews on construction sites for Labor Standards compliance.
- Maintaining files and records relating to the overall administration of the programs.
- Review payment requests for accuracy and eligibility.
- Reconcile financial records with IDIS.
- Prepare and reconcile reports submitted with the CAPER.
- Prepare Federal Cash Control Report.
- Ensure accuracy of data entered in IDIS.
- Prepare budgets and forecasts.

Reduce the Number of Persons Living Below the Poverty Level

HUD annually releases area median income limits based on information specific to the community. HUD's 2011 Median Family Income estimates for Jackson County were made utilizing a comparison of 2009 American Community Survey 5-year and 1-year estimates.

City of Jackson 2011 Area Median Income Limits

% of Median	Limit per Number of Persons in Household							
	1	2	3	4	5	6	7	8
30%	12,800	14,600	16,450	18,250	19,750	21,200	22,650	24,100
50%	21,300	24,350	27,400	30,400	32,850	35,300	37,700	40,150
60%	25,560	29,220	32,880	36,480	39,420	42,360	45,240	48,180
80%	34,100	38,950	43,800	48,650	52,550	56,450	60,350	64,250
100%	42,600	48,700	54,800	60,800	65,700	70,600	75,400	80,300

(effective June 1, 2011)

A comparison of the 2007-2009 and 2008-2010 American Community Survey Table S1701, Poverty Status in the Past 12 Months, provides a telling picture of the state of the City's impoverished residents:

	2009 ACS Estimate	2010 ACS Estimate
Population for whom poverty status is determined	27.0%	31.9%
AGE		
Under 18 years	37.2%	45.1%
Related children under 18 years.....	36.5%	44.8%
18 – 64 years.....	25.1%	29.7%
65 years and over	12.4%	11.2%
SEX		
Male	26.4%	28.9%
Female	27.5%	34.6%
RACE		
White	22.4%	24.1%
Black or African American	39.9%	49.2%
Two or more races.....	46.5%	59.7%

	2009 ACS Estimate	2010 ACS Estimate
EDUCATIONAL ATTAINMENT		
Less than high school graduate	46.5%	47.8%
High school graduate (includes GED)	22.4%	23.3%
Some college, associate's degree	14.8%	20.1%
Bachelor's degree or higher	3.3%	9.0%

The City of Jackson has neither the resources nor facilities to carry out programs directly targeted at reducing the number of households at or below the poverty level. However, through the use of CDBG and HOME funds, the City offers services and programs to assist its low- and moderate-income residents:

Deferred Loan Program – utilized through the Neighborhood & Economic Operations Department's Rehabilitation Program offering interest-free loans with no monthly payments. Repayment is deferred for 20 years or until the owner moves, rents out the home, or fails to use the property as their primary residence.

Emergency Hazard Program – as with the Deferred Loan Program, these loans are interest free with no monthly payments and allow the Neighborhood & Economic Operations Department to expedite the correction of hazardous conditions (e.g. leaking roof, non-working furnace, etc.).

Jobs Creation Initiative – incentive-based financing to for-profit businesses that hire and/or train low- and moderate-income City residents.

The Salvation Army – utility shutoff prevention assistance allowed one time per year after a decision letter from the Department of Human Services. If amount owed is significant, client is advised to call other agencies or churches to cover part of the bill.

These local efforts, backed by extremely limited funds, are unlikely to have a significant impact in reducing the number of individuals and families living below the poverty level. However, with thoughtful consideration of complementary activities to other programs available in the community, a collaborative effort among all service providers may provide more significant, measurable progress to reducing poverty rates in the City.

Leveraging Resources

Subrecipients have been successful in leveraging CDBG or HOME funds with grants from foundations, lenders, private donations, and other state and federal grant and loan programs. The United Way funds many worthwhile organizations that address the high priority needs of the community's low-income residents. The City continues to support agencies and developers in applying for other federal, state and public funds.

The City's CDBG and HOME subgrants do not require matching funds, but consideration is taken regarding the amount of other funds leveraged in a project when making allocation decisions.

Citizen Comment

Citizen input is actively solicited through publication of notifications in the *Jackson Citizen Patriot*, the area's daily newspaper, and *The Jackson Blazer*, a bi-weekly newspaper with an 80% African American readership, and through the City's website. The public is informed of meetings and public hearings and given the opportunity to comment on CDBG/HOME applications received by the City, the Action Plan, how funding is being disseminated before the Request for Release of Funds, and also the CAPER.

To further solicit citizen participation, community service providers catering to low- and moderate-income persons posted flyers created by Neighborhood & Economic Operations staff announcing the day, date, time, and reason for the public hearing. Among the agencies that posted the flyers were: Community Action Agency, the AWARE shelter, Jackson County Department of Human Services, The Salvation Army, South Central Michigan Works!, the three Jackson Housing Commission public housing complexes, the Neighborhood & Economic Operation Department's lobby, and on the front entrance doors to City Hall. Draft copies of this CAPER were made available for public viewing and comment at the main branch of the public library, City Hall, and the three public housing complexes. The City also posted the draft CAPER on its website with a link to provide comment via e-mail.



Have a Say in Your Community!

The City of Jackson will hold a Public Hearing on Tuesday, September 25, 2012 at 7:00 p.m. on the 2nd Floor of City Hall. The purpose of this Hearing is to offer you an opportunity to voice your opinion on the City's performance with Community Development Block Grant and HOME funds.

Citizen comments are extremely important!

A copy of the City's Consolidated Annual Performance and Evaluation Report is available at City Hall, Jackson District Library Carnegie Branch, Reed Manor, Shahan-Blackstone North, Chalet Terrace, and on the internet at <http://www.cityofjackson.org/neighborhood-and-economic-operations/funding-reports>.

For more information or to provide your thoughts in writing, please contact:

Michelle L. Pultz-Orthaus
Records Management Coordinator
Department of Neighborhood & Economic Operations
161 W Michigan Avenue, 3rd Floor, Jackson, MI 49201
768-6436; mpultz@cityofjackson.org

Self-Evaluation

The City's Five-Year Consolidated Plan and 2011 Action Plan were developed under interim leadership. Since that time, visioning of a new Mayor, City Manager, and Deputy City Manager led the inclusion of a Substantial Amendment to the Five-Year Consolidated Plan with the 2012 Action Plan. Much of 2011 was spent on the development of the JOES, data gathering to support the JOES plan, and beginning phases of implementation. The amount of time devoted by Neighborhood & Economic Operations staff to accomplish the planning and initial implementation somewhat hindered the ability to achieve program accomplishments. However, the City is already achieving a benefit from the plan development through increased code enforcement after hiring two temporary blight ordinance enforcement officers in July 2012. Program accomplishments will be further enhanced in 2012 when four full time and one part time code enforcement officers are hired on a permanent basis. Accomplishments and outcome measures are detailed in the Program Narratives section beginning on page 28.

Monitoring

During review of applications received through an annual competition for grant funds, a risk analysis is conducted of the potential recipient of grant funds. Based on that risk analysis, prospective

organizations are assessed for strengths and weaknesses in order to develop support mechanisms to enhance program delivery. This assessment takes into consideration the nature and eligibility of the activity, whether it is a duplicative service conducted by another agency in a more efficient manner, whether the proposed plan for carrying out the activity is realistic, the organization’s capacity to conduct the activity in a timely fashion, and also for the possibility of any conflicts of interest.

Neighborhood & Economic Operations staff conducts quarterly desk reviews of performance reports required to be filed by subrecipients of CDBG funds. From those desk reviews, staff is able to determine if a project is on track or when it is expected to be instituted. Individual agencies may receive one-on-one technical assistance meetings to help explain different aspects of the program and to aid the agency in accomplishing its goals. Each request for reimbursement is required to supply supporting documentation, which is carefully reviewed by more than one staff person before payments are made.

Staff also conducts annual on-site monitoring of subrecipients receiving grant funds to verify back up documentation to their quarterly reports. This on-site, expanded monitoring is determined based on newness of subrecipient, prior findings, performance reporting issues, or other appropriate areas that may need closer review. While a majority of the City’s subrecipients receive very favorable outcomes to the monitoring visits, some issues become apparent requiring an agency to make anywhere from minor corrective actions or a complete revision of a specific procedure to keep it in compliance with program regulations.

Program Narratives

CDBG Program

The priorities of using CDBG funds in the City of Jackson are rehabilitation of owner-occupied housing, code enforcement activity, local street improvements, other public facility/infrastructure improvements and economic development activities. To accomplish these priorities, CDBG funds were allocated as follows:

Priority 1 – Rehabilitation of Owner-Occupied Housing

Rehabilitation Neighborhood & Economic Operations	Funding \$145,927 CDBG	Target Area City-wide
	Planned Beneficiaries Low- and Moderate-Income Clientele	
Outcome Improved housing conditions for owner-occupied residences	Planned Units 21 units	Actual Units 1 Residential Rehab project 12 Emergency Hazard projects

Priority 2 – Code Enforcement

Code Enforcement Neighborhood & Economic Operations	Funding \$500,000 CDBG	Target Area City-wide
	Planned Beneficiaries Low- and Moderate-Income Area	
Outcome Improved neighborhoods	Planned Units 1,500 households	Actual Units 11 rental houses inspected 1,455 garbage citations issued 215 Inoperable/Unlicensed Vehicle citations issued 184 Dead Trees issued

Code Enforcement City Attorney's Office	Funding \$29,000 CDBG	Target Area City-wide
	Planned Beneficiaries Low- and Moderate-Income Area	
Outcome Provide legal support in the Administrative Hearings Bureau for the City's Code Enforcement program	Planned Units 200	Actual Units 132

Priority 3 – Local Street Improvements

Street Paving/Reconstruction City Engineering	Funding \$303,000 CDBG	Target Area CT006900 (fka CT000300, BG 2); CT001000, BG1; CT001100, BG1
	Planned Beneficiaries Low- and Moderate-Income Area	
Outcome Improved drivability of local streets	Planned Units 3 street segments	Actual Units 6 street segments

Priority 4 – Other Public Facility/Infrastructure Improvements

Sidewalk Handicap Curb Ramps Department of Public Works	Funding \$10,000 CDBG	Target Area CT006900 (fka CT000700)
	Planned Beneficiaries Low- and Moderate-Income Clientele (presumed)	
Outcome Improved accessibility for elderly or disabled residents	Planned Units 8	Actual Units 6

Ash Tree Removal/Replacement City Forestry	Funding \$15,000 CDBG	Target Area CT006900 (fka CT000700 & CT000300)
	Planned Beneficiaries Low- and Moderate-Income Area	
Outcome Removed dead, dying, diseased, and/or dangerous tree to beautify neighborhoods	Planned Units 100	Actual Units 110

Priority 5 – Economic Development Activities

Jobs Creation Initiative Neighborhood & Economic Operations	Funding \$50,000 CDBG	Target Area City-wide
	Planned Beneficiaries Low- and Moderate-Income Jobs	
Outcome Provided loans to businesses for improvements while creating/ retaining jobs for low-income residents	Planned Units 1	Actual Units 0

Medium Priority Activities

Client Advocate Positions Aware, Inc.	Funding \$5,500 CDBG	Target Area City-wide
	Planned Beneficiaries Low- and Moderate-Income Clientele	
Outcome Provided staffing to assist survivors of domestic violence and sexual abuse	Planned Units 360	Actual Units 703

Emergency Adult Dental Care Center for Family Health	Funding \$10,000 CDBG	Target Area City-wide
	Planned Beneficiaries Low- and Moderate-Income Clientele	
Outcome Provided affordable oral health care	Planned Units 430	Actual Units 971

MLK Summer Youth Program Parks & Recreation Dept.	Funding \$40,000 CDBG	Target Area CT001100, BG1, 2 & 3
	Planned Beneficiaries Low- and Moderate-Income Clientele	
Outcome Provided staff and operating expenses for summer enrichment program for youth	Planned Units 400	Actual Units 351

Utility Assistance The Salvation Army	Funding \$55,954 CDBG	Target Area City-wide
	Planned Beneficiaries Low- and Moderate-Income Clientele	
Outcome Allowed families to keep their power and heat on	Planned Units 363 persons	Actual Units 371

2-1-1 Call Center United Way of Jackson County	Funding \$7,500 CDBG	Target Area City-wide
	Planned Beneficiaries Low- and Moderate-Income Clientele	
Outcome Provide an information and referral service	Planned Units 5,150	Actual Units 6,059

Use of CDBG Funds for National Objectives

All CDBG funds received were allocated to meet National Objectives, specifically targeted to the City's low- and moderate-income residents, eliminating slum/blight, or meeting urgent needs. As indicated on the Financial Summary Report (PR 26), 99.51% of Jackson's CDBG funds benefited low- and moderate-income persons during the 2011 reporting period.

Anti-Displacement and Relocation

No projects were funded that involved demolition of occupied property. Temporary relocation was necessary during two rehabilitation projects during Program Year 2011.

The City of Jackson and/or its funding recipients provide for reasonable benefits to any person involuntarily and temporarily or permanently displaced as a result of the use of CDBG or HOME funds for

acquisition or rehabilitation of residential property. The City intends to cause no displacement to persons receiving assistance from the CDBG or HOME programs but recognizes that situations may arise wherein displacement, relocation or temporary relocation are the only viable methods for providing assistance. Because the City's approved contractors have extensive experience, they are able to isolate various rooms in the home to perform lead hazard control work during rehabilitation. Once that area has been addressed, the contractor then moves to another section of the home and again isolates the area to do the rehabilitation and lead hazard work. Each area is completed in expedited fashion, without exposure of the family to lead-based paint hazards. Should extensive work be necessary, the budget includes relocation costs.

Low/Mod Job Activities

The City of Jackson implemented its Jobs Creation Initiative Loan Program in 2003 as an economic development incentive to expand business and create jobs for low- and moderate-income residents. Although the loans are still being offered as part of an economic development incentive package, no businesses have applied for assistance since the economic recession beginning in 2008. However, City Council has chosen to retain a minimal amount of funding in the program so it is available should an opportunity present itself.

Program Income Received

Program Income Type	Amount
CDBG	
Sale of Real Property	\$ -0-
Economic Development Loan Repayments	1,586
Deferred Loan Repayments	14,512
MSHDA PIP Loan/Inspection Fees	-0-
HOME Administration	32,189
Accounts Receivables, Permits, Code Enf., etc.	22,458
Other Program Income	<u>901</u>
Total CDBG Program Income:	<u>\$ 71,646</u>
HOME	
HOME Program Loan Repayment	-0-
Miscellaneous	<u>\$ 25</u>
Total HOME Program Income:	<u>\$ 25</u>

Loans and Other Receivables

As of June 30, 2012, the City of Jackson has the following open outstanding loans:

No. of Loans	Type	Balance
218	Rehab (repayable)	\$2,760,688
60	Lead (forgivable)	182,184
97	Emergency Hazard (repayable)	530,482

The City's only outstanding Section 108 loan was recently paid off. In November 2000, American 1 Federal Credit Union received \$1,285,000 in a Section 108 loan to finance, in part, the renovation of two commercial properties and parking area at 718 and 801 East Michigan Avenue. The objective to create 50 FTE jobs, including hiring 47 low- to moderate-income individuals was successfully fulfilled. American

1 was recently able to obtaining financing with a lower interest rate and, therefore, requested an early payoff of the \$570,000 balance.

The City of Jackson implemented a Deposit Loan program in the early 1980s when mortgage and home improvement loan interest rates were 17% - 20%. It was originally a lump sum deposit and the bank interest earned was used to subsidize the high interest on home improvement loans to between 4% and 8%. As interest rates improved, there was no longer a need for this program; however, the City's agreement with Flagstar Bank required sufficient funds remain in the account to cover the outstanding principal on existing Title I loans. Over time, as the loans have been repaid and less and less interest was needed to subsidize existing loans, the unneeded interest was declared as program income and reused in other block grant eligible activities. Due to inactivity, the Deposit Loan program account will be closed during PY 2012.

No. of Loans	Type	Balance
0	Deposit Loan (repayable)	-0-

The City of Jackson has the following properties for sale that were acquired and/or improved using CDBG funds and are available to sale to low- and moderate-income persons. Several properties will be rehabilitated utilizing Neighborhood Stabilization Program (NSP) funding.

Tax ID No.	Address	
5-0591	208 E Morrell	Demolished December 2011; rehabilitation deemed cost prohibitive
5-1090	140 Stanley	NSP rehab; sold April 2012
5-1345	115 Damon	NSP rehab; sold April 2012
4-0654	941 S Jackson	NSP rehab; sold November 2011
3-1083	702 S Grinnell	Acquired with HOME funds; rehabilitation bids opened July 31, 2012

The following houses are also available for sale, but no CDBG or HOME funds were utilized to acquire or rehabilitate:

Tax ID No.	Address	
7-0348	604 Detroit	NSP rehab; offer accepted August 2012
3-0128	509 W Franklin	NSP rehab; sold May 2012
7-1057	1707 E Ganson	NSP rehab; sold August 2012
3-1630	733 Oakdale	NSP rehab; sold December 2011
8-0356	544 N Pleasant	NSP rehab; sold August 2011

JAHC, Community Action Agency, and Habitat for Humanity have the following properties for sale:

Tax ID No.	Address	
8-1449	622 N Waterloo	Acquired in May 2011; rehab ongoing
4-0925.2	140 Rockwell	Original partner family backed out, new partner family identified and will close in the near future

Tax ID No.	Address	
4-0595	708 S Mechanic	YouthBuild collaborative; original partner family backed out, new partner family identified and will close in the near future
4-0599	806 S Mechanic	YouthBuild collaborative; construction ongoing
7-0702	626 Harris	Construction ongoing
4-0780	132 W Wilkins	Sale closed in August, 2012

HOME Program

Rehabilitation Assistance Neighborhood & Economic Operations	Funding \$185,453 HOME	Target Area City-wide
	Planned Beneficiaries Low- and Moderate-Income Clientele	
Outcome Increased availability of improved housing units	Planned Units 18	Actual Units 10

New Construction Greater Jackson Habitat for Humanity	Funding \$75,000 HOME	Target Area City-wide
	Planned Beneficiaries Low- and Moderate-Income Clientele	
Outcome Increased homeownership opportunities	Planned Units 2	Actual Units 0

Acquisition/Rehab/Resale Community Action Agency	Funding \$53,250 HOME	Target Area City-wide
	Planned Beneficiaries Low- and Moderate-Income Clientele	
Outcome Increased availability of improved housing units	Planned Units 1	Actual Units 0

Acquisition/Rehab/Resale Neighborhood & Economic Operations	Funding \$240,000 HOME	Target Area City-wide
	Planned Beneficiaries Low- and Moderate-Income Clientele	
Outcome Increased availability of improved housing units	Planned Units 1	Actual Units 0

The goal of using HOME funds in the City of Jackson is to provide decent, affordable housing to low- and moderate-income persons. To accomplish this goal, HOME funds were allocated for rehabilitation assistance, acquisition/rehabilitation/resale, and new construction.

After careful consideration of Jackson Affordable Housing Corporation's (JAHC) performance, staff experience and developer capacity as the City's only Community Housing Development Organization (CHDO), it was determined a new CHDO was required to undertake CHDO-eligible activities. During the past few years, JAHC's progress on completing activities has been slow, the Board of Directors has been

reluctant to start new activities, they no longer have qualified staff except for the Executive Director, and the Executive Director has experienced health and family issues in the past few years that hindered her ability to consistently perform her job duties. For instance, with their last funded project as the City's CHDO, JAHG acquired a modest home at 622 North Waterloo in May 2011, and only recently awarded the rehabilitation bid in June 2012.

The Jackson Overall Economic Stabilization (JOES) Program established the need for strategic initiatives aimed at consolidating and enhancing the City's economic base. To that end, Neighborhood & Economic Operations staff reviewed the viability of homeowner rehabilitation in stabilizing residential neighborhoods. While staff recommended continuance of the owner-occupied rehabilitation program, especially in the City's target neighborhood near Allegiance Health Systems, it also recommended the City Council consider a new approach to providing housing rehabilitation.

The current program of homeowner rehabilitation establishes a cap to the amount of assistance the City can offer in a 20 year deferred loan to the homeowner, thereby limiting the level of rehabilitation that can be conducted. However, establishing a homebuyer program where the City acquires modest single-family homes in need of minor to moderate repair will permit a higher level of rehabilitation to be completed, raising not only the home's value but also that of the neighborhood in which it is sited. This concept is similar to that of the Neighborhood Stabilization Program from the Housing and Economic Recovery Act of 2008. To that end, on June 6, 2012, the City acquired the property at 702 S Grinnell Street. Currently, a rehabilitation cost estimate is being developed for soliciting bids in the near future.

The City of Jackson controls the resale of homebuyer property during the period of affordability using the recapture option as follows:

- 1) Should a homebuyer receiving a direct HOME subsidy in the amount of \$5,000 or less sell the property during the affordability period, repayment of the entire direct HOME subsidy will be triggered.
- 2) Should a homebuyer receiving a direct HOME subsidy in excess of \$5,000 sell the property during the affordability period, repayment of the direct HOME subsidy will be directly tied to the length of time the homebuyer has occupied the home in relation to the period of affordability.

If there are no net proceeds from the sale or the net proceeds are insufficient to repay the HOME subsidy due, the City will recapture the amount of the net proceeds, if any. Recaptured funds will be used for any HOME-eligible activity. The homeowner will receive a return on investment only if there are remaining net proceeds from the sale after payment of all outstanding mortgages, including the HOME mortgage and closing costs.

Based on these factors, City Council invited Community Action Agency to apply for 2011-2012 funds as the City's CHDO. After filing an Application of Certification and deemed qualified, CAA applied for and was awarded funding to complete a homebuyer project. Because CAA was very aware of the planning and evaluation processes the City was conducting on vacant housing, it held off selecting a project to acquire and rehabilitate. However, CAA is committed to working with the City to identify a suitable project, especially in light of the FY 2012 HOME Appropriations Laws. The City has set a goal for CAA to identify a project by the end of March 2013 and complete the rehabilitation and resale by June 2016.

The City of Jackson does not use HOME funds for rental housing, so no on-site inspections of rental units were conducted of HOME funded rental housing, and no affirmative marketing was required. No HOME match is required to be paid by the City of Jackson for FY2011 as HUD continues to determine the City is in severe fiscal distress. Forms HUD-40107 (HOME Program +Annual Performance Report) and HUD-40107-A (HOME Match Report) are attached to the CAPER as required.

Housing Opportunity for People with Aids (HOPWA) Program

The City of Jackson does not receive HOPWA funding.

Emergency Shelter Grants (ESG) Program

The City of Jackson does not receive ESG funding.

Appendix A

Citizen Comments

No citizen comments, either oral or written, relating to the CAPER were received during September 12 and 27, 2012, nor were any comments received during the Public Hearing on September 25, 2012.

Appendix B

Annual Performance Report

HOME Program

HUD-40107

Annual Performance Report HOME Program

U.S. Department of Housing
and Urban Development
Office of Community Planning
and Development

OMB Approval No. 2506-0171
(exp. 8/31/2009)

Public reporting burden for this collection of information is estimated to average 2.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless that collection displays a valid OMB control number.

The HOME statute imposes a significant number of data collection and reporting requirements. This includes information on assisted properties, on the owners or tenants of the properties, and on other programmatic areas. The information will be used: 1) to assist HOME participants in managing their programs; 2) to track performance of participants in meeting fund commitment and expenditure deadlines; 3) to permit HUD to determine whether each participant meets the HOME statutory income targeting and affordability requirements; and 4) to permit HUD to determine compliance with other statutory and regulatory program requirements. This data collection is authorized under Title II of the Cranston-Gonzalez National Affordable Housing Act or related authorities. Access to Federal grant funds is contingent on the reporting of certain project-specific data elements. Records of information collected will be maintained by the recipients of the assistance. Information on activities and expenditures of grant funds is public information and is generally available for disclosure. Recipients are responsible for ensuring confidentiality when public disclosure is not required.

This form is intended to collect numeric data to be aggregated nationally as a complement to data collected through the Cash and Management Information (C/MI) System. Participants should enter the reporting period in the first block. The reporting period is October 1 to September 30. Instructions are included for each section if further explanation is needed.

Submit this form on or before December 31.	This report is for period (mm/dd/yyyy)		Date Submitted (mm/dd/yyyy)
Send one copy to the appropriate HUD Field Office and one copy to: HOME Program, Rm 7176, 451 7th Street, S.W., Washington D.C. 20410	Starting	Ending	

Part I Participant Identification

1. Participant Number	2. Participant Name		
3. Name of Person completing this report		4. Phone Number (Include Area Code)	
5. Address	6. City	7. State	8. Zip Code

Part II Program Income

Enter the following program income amounts for the reporting period: in block 1, enter the balance on hand at the beginning; in block 2, enter the amount generated; in block 3, enter the amount expended; and in block 4, enter the amount for Tenant-Based rental Assistance.

1. Balance on hand at Beginning of Reporting Period	2. Amount received during Reporting Period	3. Total amount expended during Reporting Period	4. Amount expended for Tenant-Based Rental Assistance	5. Balance on hand at end of Reporting Period (1 + 2 - 3) = 5
---	--	--	---	---

Part III Minority Business Enterprises (MBE) and Women Business Enterprises (WBE)

In the table below, indicate the number and dollar value of contracts for HOME projects completed during the reporting period.

	a. Total	Minority Business Enterprises (MBE)			f. White Non-Hispanic
		b. Alaskan Native or American Indian	c. Asian or Pacific Islander	d. Black Non-Hispanic	
A. Contracts					
1. Number					
2. Dollar Amount					
B. Sub-Contracts					
1. Number					
2. Dollar Amount					
	a. Total	b. Women Business Enterprises (WBE)	c. Male		
C. Contracts					
1. Number					
2. Dollar Amount					
D. Sub-Contracts					
1. Number					
2. Dollar Amounts					

Part IV Minority Owners of Rental Property

In the table below, indicate the number of HOME assisted rental property owners and the total dollar amount of HOME funds in these rental properties assisted during the reporting period.

	a. Total	Minority Property Owners				f. White Non-Hispanic
		b. Alaskan Native or American Indian	c. Asian or Pacific Islander	d. Black Non-Hispanic	e. Hispanic	
1. Number						
2. Dollar Amount						

Part V Relocation and Real Property Acquisition

Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition. The data provided should reflect only displacements and acquisitions occurring during the reporting period.

	a. Number	b. Cost	Minority Business Enterprises (MBE)			f. White Non-Hispanic
Households Displaced	a. Total	b. Alaskan Native or American Indian	c. Asian or Pacific Islander	d. Black Non-Hispanic	e. Hispanic	f. White Non-Hispanic
1. Parcels Acquired						
2. Businesses Displaced						
3. Nonprofit Organizations Displaced						
4. Households Temporarily Relocated, not Displaced						
5. Households Displaced - Number						
6. Households Displaced - Cost						

Appendix C

HOME Match Report

HUD 40107-A

Appendix D

Section 3 Summary Reports

HUD 60002

Part II: Contracts Awarded

1. Construction Contracts: **Rehabilitation, Emergency Hazard**

A. Total dollar amount of all contracts awarded on the project	\$ 106,348.89
B. Total dollar amount of contracts awarded to Section 3 businesses	\$ 0
C. Percentage of the total dollar amount that was awarded to Section 3 businesses	0 %
D. Total number of Section 3 businesses receiving contracts	0

2. Non-Construction Contracts:

A. Total dollar amount all non-construction contracts awarded on the project/activity	\$
B. Total dollar amount of non-construction contracts awarded to Section 3 businesses	\$
C. Percentage of the total dollar amount that was awarded to Section 3 businesses	%
D. Total number of Section 3 businesses receiving non-construction contracts	

Part III: Summary

Indicate the efforts made to direct the employment and other economic opportunities generated by HUD financial assistance for housing and community development programs, to the greatest extent feasible, toward low- and very low-income persons, particularly those who are recipients of government assistance for housing. (Check all that apply.)

- Attempted to recruit low-income residents through: local advertising media, signs prominently displayed at the project site, contracts with the community organizations and public or private agencies operating within the metropolitan area (or nonmetropolitan county) in which the Section 3 covered program or project is located, or similar methods.
- Participated in a HUD program or other program which promotes the training or employment of Section 3 residents.
- Participated in a HUD program or other program which promotes the award of contracts to business concerns which meet the definition of Section 3 business concerns.
- Coordinated with Youthbuild Programs administered in the metropolitan area in which the Section 3 covered project is located.
- Other; describe below.

Review and modify program policies/guidelines; update forms to be used. Sect 3 Businesses will be identified during next program year.

Public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB number.

Section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 1701u, mandates that the Department ensures that employment and other economic opportunities generated by its housing and community development assistance programs are directed toward low- and very-low income persons, particularly those who are recipients of government assistance housing. The regulations are found at 24 CFR Part 135. The information will be used by the Department to monitor program recipients' compliance with Section 3, to assess the results of the Department's efforts to meet the statutory objectives of Section 3, to prepare reports to Congress, and by recipients as self-monitoring tool. The data is entered into a database and will be analyzed and distributed. The collection of information involves recipients receiving Federal financial assistance for housing and community development programs covered by Section 3. The information will be collected annually to assist HUD in meeting its reporting requirements under Section 808(e)(6) of the Fair Housing Act and Section 916 of the HCDA of 1992. An assurance of confidentiality is not applicable to this form. The Privacy Act of 1974 and OMB Circular A-108 are not applicable. The reporting requirements do not contain sensitive questions. Data is cumulative; personal identifying information is not included.

Part II: Contracts Awarded

1. Construction Contracts: **Rehabilitation**

A. Total dollar amount of all contracts awarded on the project	\$ 288,538.78
B. Total dollar amount of contracts awarded to Section 3 businesses	\$ 0
C. Percentage of the total dollar amount that was awarded to Section 3 businesses	0 %
D. Total number of Section 3 businesses receiving contracts	0

2. Non-Construction Contracts:

A. Total dollar amount all non-construction contracts awarded on the project/activity n/a	\$ 0
B. Total dollar amount of non-construction contracts awarded to Section 3 businesses	\$ 0
C. Percentage of the total dollar amount that was awarded to Section 3 businesses	0 %
D. Total number of Section 3 businesses receiving non-construction contracts	0

Part III: Summary

Indicate the efforts made to direct the employment and other economic opportunities generated by HUD financial assistance for housing and community development programs, to the greatest extent feasible, toward low- and very low-income persons, particularly those who are recipients of government assistance for housing. (Check all that apply.)

- Attempted to recruit low-income residents through: local advertising media, signs prominently displayed at the project site, contracts with the community organizations and public or private agencies operating within the metropolitan area (or nonmetropolitan county) in which the Section 3 covered program or project is located, or similar methods.
- Participated in a HUD program or other program which promotes the training or employment of Section 3 residents.
- Participated in a HUD program or other program which promotes the award of contracts to business concerns which meet the definition of Section 3 business concerns.
- Coordinated with Youthbuild Programs administered in the metropolitan area in which the Section 3 covered project is located.
- Other; describe below.

Review and modify program policies/guidelines; update forms to be used. Sect 3 Businesses will be identified during next program year.

Public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB number.

Section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 1701u, mandates that the Department ensures that employment and other economic opportunities generated by its housing and community development assistance programs are directed toward low- and very-low income persons, particularly those who are recipients of government assistance housing. The regulations are found at 24 CFR Part 135. The information will be used by the Department to monitor program recipients' compliance with Section 3, to assess the results of the Department's efforts to meet the statutory objectives of Section 3, to prepare reports to Congress, and by recipients as self-monitoring tool. The data is entered into a database and will be analyzed and distributed. The collection of information involves recipients receiving Federal financial assistance for housing and community development programs covered by Section 3. The information will be collected annually to assist HUD in meeting its reporting requirements under Section 808(e)(6) of the Fair Housing Act and Section 916 of the HCDA of 1992. An assurance of confidentiality is not applicable to this form. The Privacy Act of 1974 and OMB Circular A-108 are not applicable. The reporting requirements do not contain sensitive questions. Data is cumulative; personal identifying information is not included.

Appendix E

IDIS Reports

Financial Summary Report (PR26)



Office of Community Planning and Development
 U.S. Department of Housing and Urban Development
 Integrated Disbursement and Information System
 PR26 - CDBG Financial Summary Report
 Program Year 2011
 JACKSON , MI

DATE: 09-18-12
 TIME: 10:16
 PAGE: 1

PART I: SUMMARY OF CDBG RESOURCES

01 UNEXPENDED CDBG FUNDS AT END OF PREVIOUS PROGRAM YEAR	1,284,621.57
02 ENTITLEMENT GRANT	1,269,381.00
03 SURPLUS URBAN RENEWAL	0.00
04 SECTION 108 GUARANTEED LOAN FUNDS	0.00
05 CURRENT YEAR PROGRAM INCOME	71,365.31
06 RETURNS	0.00
07 ADJUSTMENT TO COMPUTE TOTAL AVAILABLE	0.00
08 TOTAL AVAILABLE (SUM, LINES 01-07)	2,625,367.88

PART II: SUMMARY OF CDBG EXPENDITURES

09 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	1,283,620.21
10 ADJUSTMENT TO COMPUTE TOTAL AMOUNT SUBJECT TO LOW/MOD BENEFIT	0.00
11 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 09 + LINE 10)	1,283,620.21
12 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	201,821.65
13 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	0.00
14 ADJUSTMENT TO COMPUTE TOTAL EXPENDITURES	0.00
15 TOTAL EXPENDITURES (SUM, LINES 11-14)	1,485,441.86
16 UNEXPENDED BALANCE (LINE 08 - LINE 15)	1,139,926.02

PART III: LOWMOD BENEFIT THIS REPORTING PERIOD

17 EXPENDED FOR LOW/MOD HOUSING IN SPECIAL AREAS	0.00
18 EXPENDED FOR LOW/MOD MULTI-UNIT HOUSING	0.00
19 DISBURSED FOR OTHER LOW/MOD ACTIVITIES	1,277,370.85
20 ADJUSTMENT TO COMPUTE TOTAL LOW/MOD CREDIT	0.00
21 TOTAL LOW/MOD CREDIT (SUM, LINES 17-20)	1,277,370.85
22 PERCENT LOW/MOD CREDIT (LINE 21/LINE 11)	99.51%

LOW/MOD BENEFIT FOR MULTI-YEAR CERTIFICATIONS

23 PROGRAM YEARS(PY) COVERED IN CERTIFICATION	PY: 2011 PY: PY:
24 CUMULATIVE NET EXPENDITURES SUBJECT TO LOW/MOD BENEFIT CALCULATION	1,283,620.21
25 CUMULATIVE EXPENDITURES BENEFITING LOW/MOD PERSONS	1,277,370.85
26 PERCENT BENEFIT TO LOW/MOD PERSONS (LINE 25/LINE 24)	99.51%

PART IV: PUBLIC SERVICE (PS) CAP CALCULATIONS

27 DISBURSED IN IDIS FOR PUBLIC SERVICES	121,527.29
28 PS UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	0.00
29 PS UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	0.00
30 ADJUSTMENT TO COMPUTE TOTAL PS OBLIGATIONS	0.00
31 TOTAL PS OBLIGATIONS (LINE 27 + LINE 28 - LINE 29 + LINE 30)	121,527.29
32 ENTITLEMENT GRANT	1,269,381.00
33 PRIOR YEAR PROGRAM INCOME	99,920.53
34 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PS CAP	0.00
35 TOTAL SUBJECT TO PS CAP (SUM, LINES 32-34)	1,369,301.53
36 PERCENT FUNDS OBLIGATED FOR PS ACTIVITIES (LINE 31/LINE 35)	8.88%

PART V: PLANNING AND ADMINISTRATION (PA) CAP

37 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	201,821.65
38 PA UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	0.00
39 PA UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	0.00
40 ADJUSTMENT TO COMPUTE TOTAL PA OBLIGATIONS	0.00
41 TOTAL PA OBLIGATIONS (LINE 37 + LINE 38 - LINE 39 +LINE 40)	201,821.65
42 ENTITLEMENT GRANT	1,269,381.00
43 CURRENT YEAR PROGRAM INCOME	71,365.31
44 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PA CAP	0.00
45 TOTAL SUBJECT TO PA CAP (SUM, LINES 42-44)	1,340,746.31
46 PERCENT FUNDS OBLIGATED FOR PA ACTIVITIES (LINE 41/LINE 45)	15.05%



Office of Community Planning and Development
 U.S. Department of Housing and Urban Development
 Integrated Disbursement and Information System
 PR26 - CDBG Financial Summary Report
 Program Year 2011
 JACKSON , MI

DATE: 09-18-12
 TIME: 10:16
 PAGE: 2

LINE 17 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 17

Report returned no data.

LINE 18 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 18

Report returned no data.

LINE 19 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 19

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2005	12	1053	5328701	NEW NEIGHBOR PROGRAM-31 CDBG	14A	LMH	\$6,942.85
2008	1	1315	5317607	RESIDENTIAL REHABILITATION	14A	LMH	\$2,480.17
2008	1	1315	5322354	RESIDENTIAL REHABILITATION	14A	LMH	\$28.00
2009	1	1386	5370150	Denied Loans	14H	LMH	\$8.10
2009	1	1386	5374488	Denied Loans	14H	LMH	\$322.42
2009	1	1386	5403663	Denied Loans	14H	LMH	\$60.00
2009	1	1386	5408872	Denied Loans	14H	LMH	\$14.00
2009	1	1388	5374488	Emergency Hazard	14A	LMH	\$23.00
2009	3	1390	5415653	Mason - Jackson to Mechanic	03K	LMA	\$5,382.51
2009	3	1390	5446165	Mason - Jackson to Mechanic	03K	LMA	\$1,710.00
2009	3	1391	5317607	Mason - Mechanic to Francis	03K	LMA	\$3,230.37
2009	3	1391	5353133	Mason - Mechanic to Francis	03K	LMA	\$14,422.91
2009	3	1391	5380222	Mason - Mechanic to Francis	03K	LMA	\$41,900.14
2009	3	1392	5353145	Loomis - Leroy to Argyle	03K	LMA	\$118,284.35
2009	3	1392	5397770	Loomis - Leroy to Argyle	03K	LMA	\$23,710.71
2009	3	1392	5415653	Loomis - Leroy to Argyle	03K	LMA	\$2,330.29
2009	3	1395	5428162	Special Assessments	03K	LMC	\$2,276.01
2009	5	1396	5317607	Sidewalk Curb Ramps	03L	LMA	\$1,927.50
2009	5	1396	5353133	Sidewalk Curb Ramps	03L	LMA	\$7,940.25
2010	1	1457	5415653	Denied Loans	14H	LMH	\$43.57
2010	1	1459	5305009	Emergency Hazard	14A	LMH	\$3,995.00
2010	1	1459	5317607	Emergency Hazard	14A	LMH	\$60.00
2010	1	1459	5322354	Emergency Hazard	14A	LMH	\$6,229.00
2010	1	1459	5328701	Emergency Hazard	14A	LMH	\$60.00
2010	1	1459	5334248	Emergency Hazard	14A	LMH	\$7.86
2010	1	1459	5346538	Emergency Hazard	14A	LMH	\$143.00
2010	1	1459	5353133	Emergency Hazard	14A	LMH	\$23.58
2010	1	1459	5357799	Emergency Hazard	14A	LMH	\$3,293.00
2010	1	1459	5364395	Emergency Hazard	14A	LMH	\$1,651.14
2010	1	1459	5370150	Emergency Hazard	14A	LMH	\$3,150.00
2010	1	1459	5374488	Emergency Hazard	14A	LMH	\$5,441.86
2010	1	1459	5386225	Emergency Hazard	14A	LMH	\$7,147.00
2010	1	1459	5386656	Emergency Hazard	14A	LMH	\$5,370.00
2010	1	1459	5392573	Emergency Hazard	14A	LMH	\$3,593.00
2010	1	1459	5397770	Emergency Hazard	14A	LMH	\$2,133.86
2010	1	1459	5403663	Emergency Hazard	14A	LMH	\$120.00
2010	1	1459	5408872	Emergency Hazard	14A	LMH	\$23.00
2010	1	1459	5415653	Emergency Hazard	14A	LMH	\$10,050.68
2010	1	1459	5422392	Emergency Hazard	14A	LMH	\$12,313.00
2010	1	1459	5432715	Emergency Hazard	14A	LMH	\$60.00
2010	1	1459	5438516	Emergency Hazard	14A	LMH	\$7.86
2010	1	1459	5446165	Emergency Hazard	14A	LMH	\$60.00
2010	1	1459	5451032	Emergency Hazard	14A	LMH	\$15.57
2010	1	1493	5311383	World Changers	14A	LMH	\$19,235.74
2010	1	1493	5322354	World Changers	14A	LMH	\$119.09
2010	1	1493	5341076	World Changers	14A	LMH	\$1,575.00
2010	3	1461	5353133	Wilkins - Jackson to Williams	03K	LMA	\$67,732.93



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2010	3	1461	5357799	Wilkins - Jackson to Williams	03K	LMA	\$200.75
2010	3	1461	5380222	Wilkins - Jackson to Williams	03K	LMA	\$323.41
2010	3	1461	5408872	Wilkins - Jackson to Williams	03K	LMA	\$13,177.90
2010	3	1461	5446165	Wilkins - Jackson to Williams	03K	LMA	\$11,266.77
2010	3	1463	5380222	Wilkins - Mechanic to Francis	03K	LMA	\$136,000.00
2010	4	1465	5353133	Curb Ramps	03L	LMA	\$20,000.00
2010	5	1466	5353133	Ash Tree Removal/Replacement	03N	LMA	\$13,775.64
2010	5	1466	5380222	Ash Tree Removal/Replacement	03N	LMA	\$224.36
2010	6	1467	5305009	Code Enforcement	15	LMA	\$37.44
2010	6	1467	5305157	Code Enforcement	15	LMA	\$15,041.34
2010	6	1467	5311383	Code Enforcement	15	LMA	\$16,014.24
2010	6	1467	5317607	Code Enforcement	15	LMA	\$7,982.91
2010	6	1467	5317617	Code Enforcement	15	LMA	\$0.18
2010	6	1467	5322354	Code Enforcement	15	LMA	\$15,671.58
2010	6	1467	5328701	Code Enforcement	15	LMA	\$21,326.28
2010	6	1467	5334248	Code Enforcement	15	LMA	\$16,134.11
2010	6	1467	5341076	Code Enforcement	15	LMA	\$9,339.87
2010	6	1468	5311383	Code Enforcement - Attorney	15	LMA	\$3,642.68
2010	6	1468	5317607	Code Enforcement - Attorney	15	LMA	\$414.83
2010	6	1468	5322354	Code Enforcement - Attorney	15	LMA	\$3,906.92
2010	6	1468	5341076	Code Enforcement - Attorney	15	LMA	\$3,449.22
2010	6	1468	5353133	Code Enforcement - Attorney	15	LMA	\$3,298.23
2010	6	1468	5364395	Code Enforcement - Attorney	15	LMA	\$3,991.85
2010	6	1468	5380222	Code Enforcement - Attorney	15	LMA	\$1,580.70
2010	6	1468	5386711	Code Enforcement - Attorney	15	LMA	\$3,159.06
2010	6	1468	5392573	Code Enforcement - Attorney	15	LMA	\$5,822.15
2010	8	1470	5328701	Homeownership Counseling	05U	LMC	\$128.27
2010	8	1470	5415653	Homeownership Counseling	05U	LMC	\$135.05
2010	11	1473	5317607	After-School Program	05D	LMC	\$2,309.97
2011	2	1518	5380222	Biddle: Jackson to Williams	03K	LMA	\$4,500.00
2011	2	1518	5408872	Biddle: Jackson to Williams	03K	LMA	\$1,250.00
2011	2	1519	5380222	Forest: Bend to Edgewood	03K	LMA	\$94.50
2011	2	1519	5408872	Forest: Bend to Edgewood	03K	LMA	\$5,000.75
2011	2	1519	5446165	Forest: Bend to Edgewood	03K	LMA	\$1,212.12
2011	2	1520	5380222	Homewild: Ellery to Edgewood	03K	LMA	\$94.50
2011	2	1520	5408872	Homewild: Ellery to Edgewood	03K	LMA	\$5,546.51
2011	2	1520	5446165	Homewild: Ellery to Edgewood	03K	LMA	\$1,904.70
2011	3	1522	5353133	Handicap Curb Ramps	03L	LMC	\$1,713.65
2011	4	1523	5380222	Ash Tree Removal/Replacement	03N	LMA	\$5,574.78
2011	4	1523	5408872	Ash Tree Removal/Replacement	03N	LMA	\$7,524.86
2011	4	1523	5446165	Ash Tree Removal/Replacement	03N	LMA	\$1,900.00
2011	5	1524	5341076	Code Enforcement	15	LMA	\$6,839.21
2011	5	1524	5346538	Code Enforcement	15	LMA	\$15,526.11
2011	5	1524	5353133	Code Enforcement	15	LMA	\$13,002.39
2011	5	1524	5357799	Code Enforcement	15	LMA	\$23,644.48
2011	5	1524	5364395	Code Enforcement	15	LMA	\$25,415.11
2011	5	1524	5370150	Code Enforcement	15	LMA	\$493.55
2011	5	1524	5370195	Code Enforcement	15	LMA	\$14,714.69
2011	5	1524	5374488	Code Enforcement	15	LMA	\$24,288.97
2011	5	1524	5380222	Code Enforcement	15	LMA	\$14,585.41
2011	5	1524	5386711	Code Enforcement	15	LMA	\$20,507.47
2011	5	1524	5392573	Code Enforcement	15	LMA	\$21,000.07
2011	5	1524	5397770	Code Enforcement	15	LMA	\$16,195.24
2011	5	1524	5403663	Code Enforcement	15	LMA	\$15,532.96
2011	5	1524	5408872	Code Enforcement	15	LMA	\$16,242.50
2011	5	1524	5415653	Code Enforcement	15	LMA	\$21,174.03
2011	5	1524	5422392	Code Enforcement	15	LMA	\$15,937.42



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2011	5	1524	5428162	Code Enforcement	15	LMA	\$56,328.33
2011	5	1524	5432715	Code Enforcement	15	LMA	\$16,567.53
2011	5	1524	5438516	Code Enforcement	15	LMA	\$16,272.17
2011	5	1524	5446165	Code Enforcement	15	LMA	\$16,005.14
2011	5	1524	5451028	Code Enforcement	15	LMA	\$3,288.14
2011	5	1524	5451032	Code Enforcement	15	LMA	\$322.51
2011	5	1524	5456632	Code Enforcement	15	LMA	\$6,743.97
2011	5	1524	5462491	Code Enforcement	15	LMA	\$851.83
2011	5	1526	5392573	Code Enforcement - Jackson City Attorney	15	LMA	\$1,571.74
2011	5	1526	5403663	Code Enforcement - Jackson City Attorney	15	LMA	\$7,455.23
2011	5	1526	5428162	Code Enforcement - Jackson City Attorney	15	LMA	\$10,399.58
2011	5	1526	5446165	Code Enforcement - Jackson City Attorney	15	LMA	\$3,236.89
2011	5	1526	5456622	Code Enforcement - Jackson City Attorney	15	LMA	\$2,953.78
2011	6	1527	5432715	AWARE - Client Advocate Positions	05G	LMC	\$4,580.00
2011	6	1527	5456622	AWARE - Client Advocate Positions	05G	LMC	\$920.00
2011	7	1528	5357799	King Center Summer Youth Program	05D	LMC	\$40,000.00
2011	8	1529	5341076	Emergency Adult Dental Care	05M	LMC	\$8,374.45
2011	8	1529	5364395	Emergency Adult Dental Care	05M	LMC	\$1,625.55
2011	9	1530	5341076	Central Michigan 2-1-1	05	LMC	\$4,515.62
2011	9	1530	5380222	Central Michigan 2-1-1	05	LMC	\$2,984.38
2011	10	1531	5380224	Utility Shutoff Prevention	05Q	LMC	\$4,904.91
2011	10	1531	5415653	Utility Shutoff Prevention	05Q	LMC	\$26,256.03
2011	10	1531	5438516	Utility Shutoff Prevention	05Q	LMC	\$17,193.06
2011	10	1531	5456622	Utility Shutoff Prevention	05Q	LMC	\$7,600.00
Total							\$1,277,370.85