

C • D • B • G

signs of progress • signs of success

2010-2011 Action Plan



SF 424

The SF 424 is part of the CPMP Annual Action Plan. SF 424 form fields are included in this document. Grantee information is linked from the 1CPMP.xls document of the CPMP tool.

SF 424

Complete the fillable fields (blue cells) in the table below. The other items are pre-filled with values from the Grantee Information Worksheet.

Date Submitted	Applicant Identifier	Type of Submission	
Date Received by state	State Identifier	Application	Pre-application
Date Received by HUD	Federal Identifier	<input type="checkbox"/> Construction	<input type="checkbox"/> Construction
		<input checked="" type="checkbox"/> Non Construction	<input type="checkbox"/> Non Construction
Applicant Information			
Jurisdiction: Error! Not a valid link.		UOG Code:	Error! Not a valid link.
Address: Error! Not a valid link.		DUNS:	Error! Not a valid link.
		Organizational Unit: Error! Not a valid link.	
City: Error! Not a valid link.	State: Error! Not a valid link.	Department: Error! Not a valid link.	
ZIP: Error! Not a valid link.	Error! Not a valid link.	Division: Error! Not a valid link..	
Employer Identification Number (EIN):		County: Error! Not a valid link.	
Error! Not a valid link.		Error! Not a valid link. 07/01/10	
Applicant Type:		Specify Other Type if necessary:	
Error! Not a valid link.		Error! Not a valid link.	
		U.S. Department of Housing and Urban Development	
Program Funding			
Catalogue of Federal Domestic Assistance Numbers; Descriptive Title of Applicant Project(s); Areas Affected by Project(s) (cities, Counties, localities etc.); Estimated Funding			
Community Development Block Grant		14.218 Entitlement Grant	
CDBG Project Titles Various		Description of Areas Affected by CDBG Project(s) – Citywide	
CDBG Grant Amount \$1,516,045	Additional HUD Grant(s) Leveraged	Describe	
Additional Federal Funds Leveraged		Additional State Funds Leveraged	
Locally Leveraged Funds		Grantee Funds Leveraged	
Anticipated Program Income \$100,000		Other (Describe)	
Total Funds Leveraged for CDBG-based Project(s) \$1,616,045			
Home Investment Partnerships Program		14.239 HOME	
HOME Project Titles Housing		Description of Areas Affected by HOME Project(s) Citywide	
HOME Grant Amount \$364,345	Additional HUD Grant(s) Leveraged	Describe	
Additional Federal Funds Leveraged		Additional State Funds Leveraged	
Locally Leveraged Funds		Grantee Funds Leveraged	

Anticipated Program Income		Other (Describe)	
Total Funds Leveraged for HOME-based Project(s) \$364,345			
Housing Opportunities for People with AIDS		14.241 HOPWA	
HOPWA Project Titles		Description of Areas Affected by HOPWA Project(s)	
HOPWA Grant Amount	Additional HUD Grant(s) Leveraged	Describe	
Additional Federal Funds Leveraged		Additional State Funds Leveraged	
Locally Leveraged Funds		Grantee Funds Leveraged	
Anticipated Program Income		Other (Describe)	
Total Funds Leveraged for HOPWA-based Project(s)			
Emergency Shelter Grants Program		14.231 ESG	
ESG Project Titles		Description of Areas Affected by ESG Project(s)	
ESG Grant Amount	Additional HUD Grant(s) Leveraged	Describe	
Additional Federal Funds Leveraged		Additional State Funds Leveraged	
Locally Leveraged Funds		Grantee Funds Leveraged	
Anticipated Program Income		Other (Describe)	
Total Funds Leveraged for ESG-based Project(s)			
Congressional Districts of:		Is application subject to review by state Executive Order 12372 Process?	
Applicant Districts	Project Districts		
Is the applicant delinquent on any federal debt? If "Yes" please include an additional document explaining the situation.		<input type="checkbox"/> Yes	This application was made available to the state EO 12372 process for review on DATE Program is not covered by EO 12372
		<input type="checkbox"/> No	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	Program has not been selected by the state for review

Person to be contacted regarding this application		
First Name Michelle	Middle Initial L.	Last Name Pultz
Title Project Coordinator	Phone (517) 768-6436	Fax (517) 780-4781
E-mail mpultz@cityofjackson.org	Website www.cityofjackson.org	Director Carol L. Konieczki (517) 768-6438
Signature of Authorized Representative Karen F. Dunigan, Mayor		Date Signed May _____, 2010

Table of Contents

Application for Federal Assistance – SF-424

Narrative Responses

Executive Summary.....	1
General Information	3
Managing the Process.....	5
Citizen Participation.....	6
Institutional Structure.....	6
Monitoring.....	7
Lead-based Paint	7

Housing

Specific Housing Objectives	10
Needs for Public Housing	10
Barriers to Affordable Housing.....	11
HOME	12

Homeless

Specific Homeless Prevention Elements	14
---	----

Community Development

Community Development.....	17
Antipoverty Strategy.....	23

Non-Homeless Special Needs Housing

Non-Homeless Special Needs Housing.....	26
---	----

Summary

Summary	27
---------------	----

Appendices

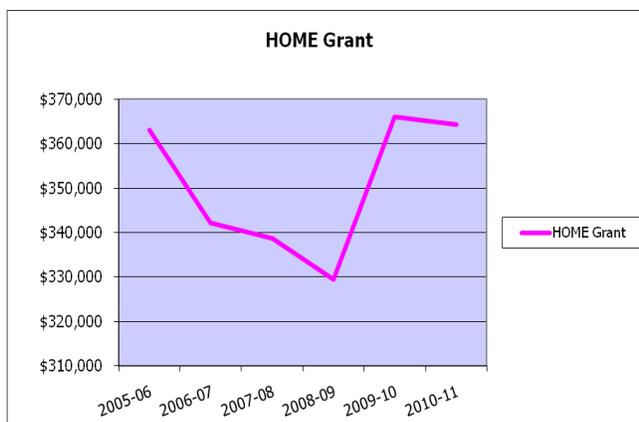
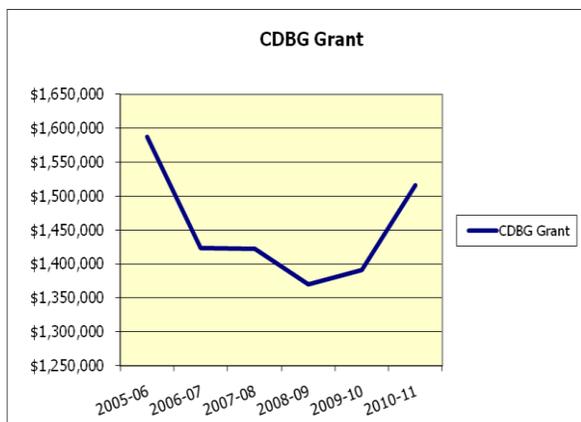
Appendix A	Citizen Comments
Appendix B	City Council Resolution Dated May 11, 2010
Appendix C	Certifications

Executive Summary

The City of Jackson presents this One-Year Action Plan for Program Year 2010 as a sixth year to the 2005-2009 5-Year Consolidated Plan. At the Department of Housing and Urban Development's (HUD) invitation, a request to extend the submission of the 5-Year Consolidated Plan to HUD was made on February 24, 2010 to allow the City more time to develop a meaningful plan. Some of the issues raised in this request were the resignation of the City Manager, appointment of Interim City Manager, election of new Mayor, focus of City Council and City leaders in balancing the General Fund budget, lack of updated Comprehensive Plan (which is currently in development), and the unusual amount of time required of the Community Development administrative staff to gain knowledge of and oversee three new grants received by the City from the Housing and Economic Recovery Act of 2008 and American Recovery and Reinvestment Act of 2009. On March 24, 2010, the City received confirmation from HUD the submission of the 5-Year Consolidated Plan had been extended to May 17, 2011. Information received at the Michigan Community Development Association Spring Conference on March 4, 2010 revealed the Consolidated Plan requirements may undergo significant changes in 2010.

The 2010-2011 fiscal year represents the City's 36th consecutive year to receive a CDBG entitlement grant and 20th year to receive a HOME entitlement grant. During the years covered by the 2005-2009 5-Year Consolidated Plan, the City's CDBG formula allocation decreased nearly 14% during the first four years and decreased over 9% in HOME funding. Program Year 2009 realized a 1.5% increase in CDBG funds from the year before and a 1% increase in HOME funds. While HOME funds were decreased slightly in Program Year 2010, CDBG funds realized an over 8% increase.

Fiscal Year	CDBG Grant	HOME Grant
2005-2006	\$1,587,449	\$363,120
2006-2007	1,423,439	342,188
2007-2008	1,422,034	338,709
2008-2009	1,369,903	329,548
2009-2010	1,391,448	365,975
2010-2011	1,516,045	364,345



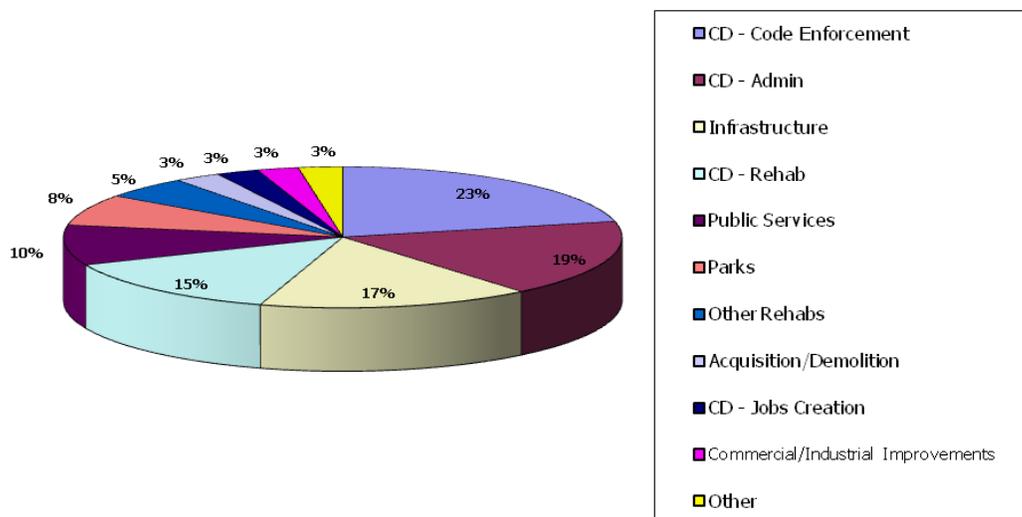
During program years 2005 to 2009, the largest share of CDBG funds were used to support staff and operation costs to provide blight ordinance enforcement, systematic housing code enforcement, and issues related to the rehabilitation program, such as specification writing, inspections, preparing loan documents, and contract payments. The support of these City services related to neighborhood cleanliness and preservation of housing stock has remained a priority for City Council.

The second largest focus of CDBG funding was for infrastructure improvements, including streetscaping and lighting for the downtown area, sidewalk replacement, installation of handicap curb ramps, and street paving/reconstruction. A severe reduction in state revenue sharing, and loss of taxpaying residents, resulting in lower income and property taxes collected, have resulted in the City's General Fund no longer being able to support local street projects. Consequently, the lack of funding has caused significant deterioration of streets in neighborhoods. Federal and state grants are continuously sought to fund local street repair, maintenance, repaving, and reconstruction work.

The failing economy has also highly contributed to homeowners needing assistance to repair their residences, including a significant increase in requests to alleviate emergency conditions. The City's Residential Rehabilitation and Emergency Hazard loan programs have been a saving grace for many of the City's low- and moderate-income homeowners to make their homes safe and livable for many years in the future. The City's Community Development staff administers the CDBG and HOME grants, and other HUD-funded grants the City may receive, and appropriate administration and planning fees have been allocated for this purpose. While HUD imposes a 20% cap on Administration and Planning obligations, during the past four years the City has averaged about 18.5%.

Without support from the City's CDBG entitlement grant, many services offered by non-profit organizations to meet the low- and moderate-income residents' needs would be severely reduced or potentially non-existent. City Council carefully considers all applications received under the public service cap and allocates funding based on the community's current needs and programs that would impact the most residents. Historically, utility shutoff assistance and emergency adult dental care to meet basic housing and health needs have received higher priority. Funding is also made available to programs proven to provide successful outcomes benefiting the area youth and adults. Public service obligations have averaged about 9.7% during the previous four years, remaining within the HUD-imposed 15% cap.

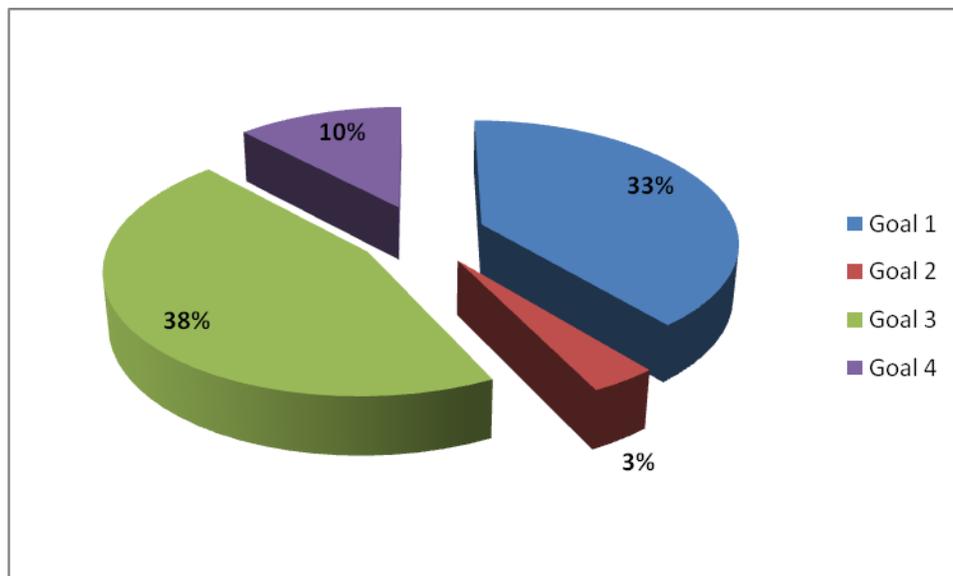
The City has also improved recreational parks in low- and moderate-income neighborhoods with CDBG funds, enabling basketball and tennis courts to be usable again, improving vehicular and handicapped accessibility to the parks, as well as creating a small neighborhood pocket park. Other rehabs include much needed improvements to the John George Home, a multi-unit complex for elderly, indigent men; improvements to two homeless shelters, one of which is for survivors of domestic violence and sexual abuse; and improving housing options for other homeowners by non-profit developers. Below is a graph demonstrating areas of obligation during program years 2005 through 2008 (spending for program year 2009 is currently ongoing).



The 2005-2009 5-Year Consolidated Plan identified four major goals in expending CDBG and HOME funds:

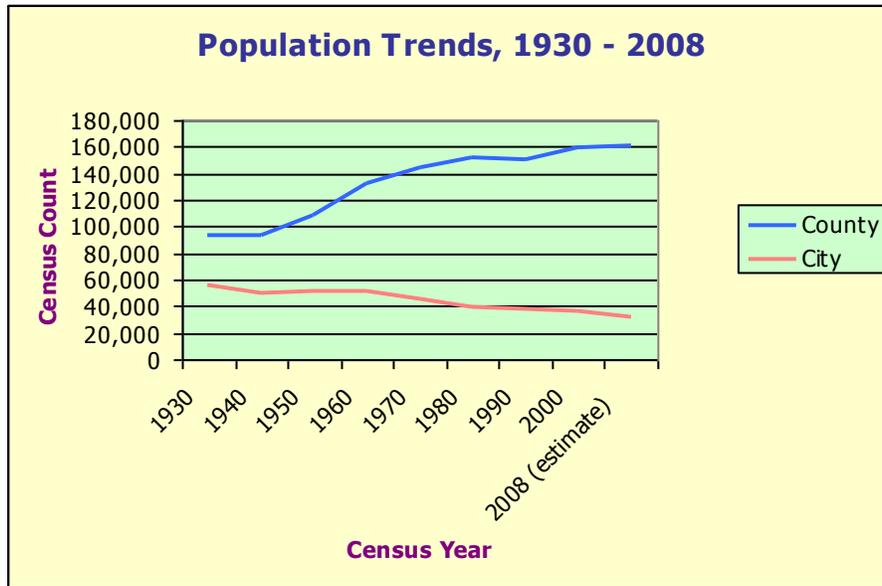
- 1) Provide safe, decent and affordable housing by preserving the existing housing stock and developing opportunities for the addition of affordable homeownership units.
- 2) Encourage an economic climate that supports businesses providing livable-wage jobs in economic sectors likely to remain in strong demand for the foreseeable future by creating permanent jobs, undertaking long-term economic development efforts through entrepreneurial training, enhancing skills through education and training, and providing supportive services to enable access to these employment opportunities.
- 3) Prevent and eliminate blight by improving public facilities whose primary beneficiaries are residents with low- and moderate-incomes.
- 4) Provide an adequate level of human services that satisfies basic social, physical, mental, emotional, and economic needs of all residents, especially those with low- and moderate-incomes.

City Council allocated the following percentages of 2010-2011 CDBG and HOME funds to meet these goals:

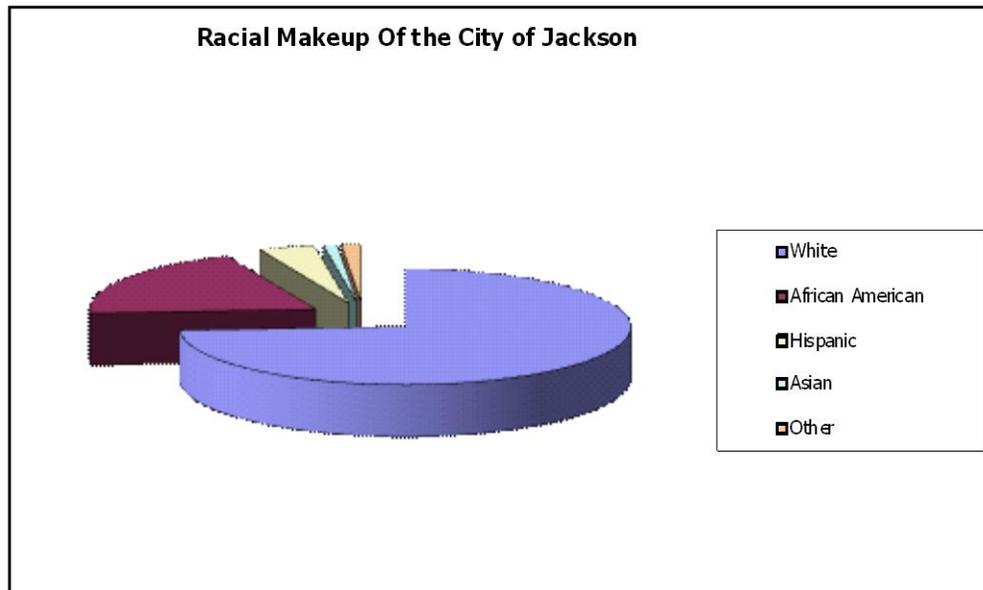


General Information

Jackson County is strategically located in south-central Michigan at the crossroads of two major highways, Interstate 94 and US-127, and also by state highways M-50 and M-60. Lansing, the capital of Michigan, is located less than an hour's drive north, Detroit approximately 70 miles to the east, and Chicago approximately 200 miles to the west. The City of Jackson encompasses approximately eleven square miles and, according to 2000 Census data, had a population of 36,316 residents. However, the 2006-2008 American Community Survey Three Year Estimates indicate the City's population likely decreased since the 2000 Census. Since 1930 when the City's population was 55,187, 42.5% of residents moved to other locations.

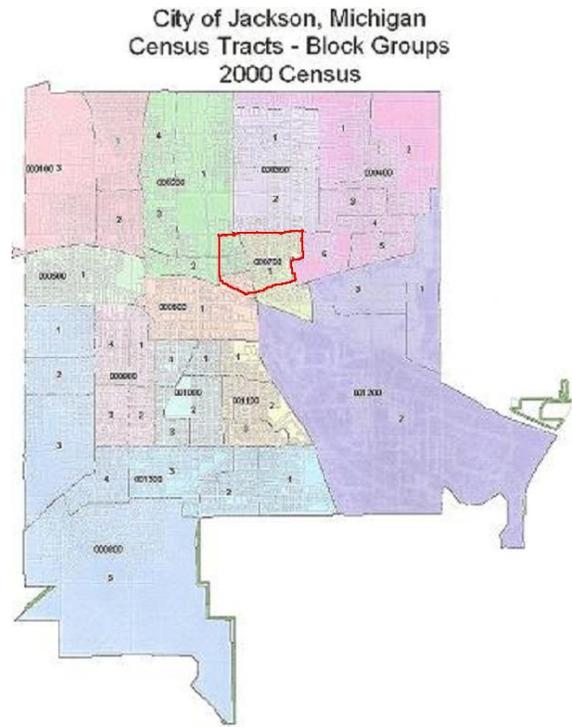


The current population has a median age of 33.1 and is made up of 53% female and 47% male residents, based on the 2006-2008 American Community Survey. Racially, the City is comprised of 74% white and 20% black or African-American. The remaining 6% of residents are made up of other single races or two or more races. Approximately 4% of the City's populace claims a Hispanic or Latino ethnicity.



At the close of 2009, while the annual unemployment rate in the United States rose to 9.3%, Michigan recorded 14.0%, Jackson County 14.3%, and the City of Jackson 20.0%. The City realized an increase of 5.8 percentage points from December 2008 (15.8%) to December 2009 (21.6%) and has been at 19.9% or higher since May 2009. July 2009 experienced the highest jobless rate at 22.2%.

The City of Jackson received \$1.7 million in Neighborhood Stabilization Program (NSP) funds through the Michigan State Housing Development Authority and identified Census Tract 7 as the specific target area. To date, NSP funds have been used to demolish 22 blighted structures, provide homebuyer assistance to three households, and initiate four rehabilitation projects. The balance of NSP funds will be used for additional acquisition/rehab, homebuyer assistance and demolition. According to 2000 Census data, Census Tract 7 experienced a poverty rate of 22.2%, vacancy rate of 10.5%, homeownership rate of 36.4% and, at the time of the Census, experienced the highest unemployment rate in the City at 19.8%.



From the American Recovery and Reinvestment Act of 2009, the City received formula grants from HUD of \$568,942 in Homelessness Prevention and Rapid Re-Housing Program (HPRP) funds and \$371,955 in CDBG-Recovery (CDBG-R). The City will utilize \$366,000 of CDBG-R funds to reconstruct two blocks of local streets, which should be completed by the end of construction season 2010. Neighbors in Need, a group of about 30 local service providers, was allocated \$500,000 in HPRP funds, which is being facilitated by United Way of Jackson County, the fiduciary of Neighbors in Need. United Way then subgranted to:

- Do'Chas II** Provide assistance to 4 youth aging out of foster care.
- AWARE, Inc.** Provide assistance to domestic violence and sexual assault survivors.
- Salvation Army** Provide assistance to the general City populace deemed eligible.
- Legal Services** Provide legal representation to tenants being evicted from their homes.
- Central Michigan 2-1-1** Perform outreach and engagement; conduct initial screening of prospective HPRP participants and refer to proper agency.
- United Way** Coordination of HMIS data collection.

Ten percent of HPRP funds were expended for eligible activities during the first month of offering services to program participants and, as of April 28, 2010, Jackson leads the state in spending with 31% of funds drawn. It is anticipated these funds will be close to fully expended by the end of 2010.

Managing the Process

The City of Jackson is the lead agency to administer the programs covered by the Consolidated Plan. During development of this Action Plan, City staff relied on input from various non-profit organizations delivering services to address the community's needs, especially as it relates to housing, and other City administrative staff members. Consultation with the executive director of Jackson Housing Commission, the City's Public Housing Authority, and review of their Annual Report helped provide

information regarding public housing. Staff also attended monthly Continuum of Care meetings and consulted with homeless shelter directors for input regarding homeless needs. Other meetings regularly attended by staff included Neighbors in Need, Income Community Solutions, and Emergency Needs Coalition.

The Jackson City Council conducted a public hearing on January 26, 2010 to seek public input on community development and housing needs before writing this Action Plan. Comments received at that public hearing were mostly from the agencies applying for funds, enabling them to give an oral presentation of their application and reiterate the need to financially support their proposed projects. All comments received are attached at the end of this Action Plan.

City staff will continue to help bring agencies together whose separate individual programs compliment each other and provide a better overall service for City residents. By attending more community needs meetings, staff has been able to connect agencies with similar visions and goals in order to facilitate collaboration and reduce duplicative services.

Citizen Participation

During the preliminary planning stages to develop the City's 5-Year Consolidated Plan, the City's current Citizen Participation Plan was evaluated. After much research and analysis of the City's Citizen Participation structure and consultation with similar-sized entitlement communities in Michigan, it was determined improvements could be made to that plan, including the Citizens Advisory Council. Staff is currently revising the Citizen Participation Plan as authorized by the Jackson City Council, which will restructure the advisory council to be comprised of community leaders and citizens from CDBG-eligible areas that could conduct public hearings, receive citizen comments, provide reports to City Council regarding those hearings and comments, provide guidance to Councilmembers in allocations, and evaluate annual grant performance.

Because the City deviated from its current Citizen Participation Plan during its redevelopment, extra measures were taken to solicit public comment. Community service providers catering to low- and moderate-income persons posted flyers created by Community Development staff announcing the day, date, time, and reason for the public hearing. Among the agencies that posted the flyers were: Community Action Agency's housing assistance office, 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 Community Development Department's lobby, and on the front entrance doors to City Hall.

City Administration staff met on January 28, 2010 and, using an Application Rating System, reviewed and scored all applications to determine if the prospective subrecipient had the means and capacity to provide the service, ability to meet Federal requirements associated with the planned activity, and level of technical assistance or oversight which might be necessary. City Administration recommendations were presented to the City Council before it made preliminary allocations on March 9, 2010. Those recommendations and other citizen comments received during the Public Hearing on January 26, 2010 are attached at the end of this Action Plan.

Institutional Structure

The City of Jackson works with other organizations, including public institutions, non-profit organizations, and private industry, in carrying out its objectives in the Action Plan. The City will continue to strengthen relationships with agencies that provide services to Jackson's low- and moderate-income residents. Coordination and collaboration among housing providers, social service agencies, and local government is expected to continue during the coming year.

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.

City staff has attended meetings of the Partnership Park Neighborhood Association to receive and act on issues addressed during those meetings. Staff has also attended meetings of the Jackson Area Association of Realtors and Jackson Area Landlord's Association to discuss programs offered by the City, such as its rehabilitation and lead hazard control programs. Additional meetings of community service providers are regularly attended by City staff, such as Neighbors in Need, Income Community Solutions, Continuum of Care, and the Emergency Needs Coalition to stay informed of the City's community development and housing needs.

Through CDBG and HOME funding, several non-profit agencies have been able to improve and/or expand upon the services provided to low- and moderate-income residents. Such assistance has focused on providing health services to those who have no other access to those services; youth programs designed to guide not only the youth, but also their families, in appropriate behaviors; and activities to make decent, affordable housing attainable, such as utility shutoff prevention, foreclosure prevention, down payment assistance, and homeownership counseling.

Monitoring

Community Development staff conducts desk reviews of quarterly performance reports required to be filed by each subrecipient of CDBG funds. From those desk reviews, staff is able to determine if a project is on track or when it is expected to begin. One-on-one technical assistance meetings are scheduled with individual agencies to help explain different aspects of the program and to aid the agency in accomplishing its goals. Each request for reimbursement from the CDBG or HOME grant needs to supply supporting documentation, which is carefully reviewed by staff before payments are made. From these desk reviews, staff is able to determine the amount of oversight each activity may require to achieve best results.

Two staff members conduct annual on-site monitorings of each subrecipient receiving CDBG or HOME funds to verify back up documentation to their quarterly reports was part of their recordkeeping activities. Other facets of the program are reviewed as well, including financial records. While a majority of the City's subrecipients have received very favorable outcomes to the monitoring visit, some issues became apparent that required the agency to either take minor corrective action or completely revise a certain procedure to keep it in compliance with program regulations.

Lead-based Paint

The City of Jackson Community Development staff conducts visual inspections for defective paint surfaces. During routine inspections of properties involved in rehabilitation, homeowners are given educational materials about the dangers of lead-based paint. Women, Infants and Children (WIC) participants are advised of the availability of lead-based blood tests offered through the Jackson County Health Department. City of Jackson inspectors are trained on the requirements of the HUD Lead Safe Housing Rule (24 CFR 35, as amended 6/21/04) and ensure lead-based paint problems are properly resolved in all City funded housing rehabilitation projects.

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 rate, 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 virtually all applicants for rehabilitation assistance must be tested for lead-based paint. Over the years, the City has utilized a number of certified companies to provide lead risk assessments and clearance reports for its projects. The City also maintains a list of approved area general contractors certified by the State of Michigan to utilize lead-safe work practices, interim controls, and lead-based paint hazard abatement to housing rehabilitation projects. Jackson is fortunate to have an experienced rehabilitation staff; all have received training in implementation of HUD Lead-Based Paint Regulations under the Residential Lead-Based Paint Hazard Reduction Act of 1992, which is Title X of the Housing and Community Development Act of 1992, and are able to conduct housing inspections, integrate and incorporate the findings of a lead risk assessment and paint inspection, and prepare construction specifications for City rehabilitation projects to address both issues.

In 2006, the City of Jackson was awarded a two million dollar HUD Office of Healthy Homes Lead Hazard Control Grant 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 paint hazards in the home, testing of young children under age 6 for elevated blood lead levels, and funding to remediate the lead paint hazards from the home. The program provided up to \$20,000 of assistance to eligible homeowners and up to \$15,000 per unit of assistance to eligible rental properties with families of low- and moderate-income living in the unit. The City partnered with Community Action Agency, the Jackson County Health Department, and the Center for Family Health to promote and implement the program within the City of Jackson and throughout Jackson County. Lead program staff has received specialized training in the areas of lead risk assessment, lead paint testing, and lead clearance testing. With this funding, the City was able to provide 173 lead safe units. Approximately 18% of the total number of children under age 6 in Jackson County have been tested for blood lead levels, with 3% having levels greater than or equal to 10 micrograms per deciliter, indicating an elevated blood lead level as defined by the Center for Disease Controls.

The current grant expired on March 31, 2010 and, while the City applied for HUD FY2009 continuation of funding, we were not successful. HUD complimented the City of Jackson for presenting an excellent application, and strongly encouraged the City to apply for 2010 funds. A debriefing session revealed scoring was just shy of having been approved:

Rating Factor	Total Possible Points	City's Score
Capacity of Applicant and Relevant Organizational Experience	20	16.95
Need/Extent of the Problem	15	13.00
Soundness of Approach	40	31.40
Leveraged Funds	10	10.00
Results and Program Evaluation	15	13.05
EZ/EZRC	2 (bonus)	n/a
Total:	102	84.40

In an attempt to secure supplemental gap funding between the end of the Lead Hazard Control Grant and the FY2010 NOFA, City staff contacted Senator Debbie Stabenow and Congressman Mark Schauer. Congressman Schauer contacted the Office of Healthy Homes and Lead Hazard Control for any recaptured or unexpended funds, but no additional funding was available. City staff is

maintaining a waiting list, currently at 48 potential participants, should the City be successful in attaining FY2010 funding. The loss of this grant funding has not only put City of Jackson children at risk of elevated blood lead levels (nearly 86% of the City's housing stock was built before 1970), it has also created an economic impact to the community. For each job awarded, a lead paint risk assessor, contractor and crew (2 – 3 people), lead clearance professional, and local material suppliers were used. Loss of the grant also led to the termination of two City employees who staffed the administrative and project development duties.

Housing

Specific Housing Objectives

The City provided funds to create decent, affordable housing opportunities for its residents through financial assistance to eligible households to facilitate ownership by low- and moderate-income persons. The City also provided assistance to local non-profits to fund affordable housing development. For fiscal year 2010-2011, the City has allocated the following funds to achieve these objectives:

	CDBG	HOME
Homeownership Counseling		
Counseling and direction for potential new homeowners; required when receiving down payment assistance.	\$ 8,000	
Rehabilitation – Community Development	\$186,000	\$179,945
Emergency hazard loans (CDBG only) of up to \$10,000; a 20-year, zero percent interest rate deferred loan to low- and moderate-income homeowners.		
Rehabilitation loans of up to \$20,000; a 20-year, zero percent interest deferred loan to low- and moderate-income homeowners. Loans to correct lead issues have no maximum level cap and are forgivable after five years.		
Down Payment Assistance		\$40,000
Financial assistance in the form of closing costs, prepaids, down payment, or other assistance required for a family to purchase a home.		
CHDO Set-Aside Activities		\$90,000
Acquisition/Rehabilitation/Resale.		

By dividing Residential Rehabilitation allocations to the Community Development Department from both CDBG and HOME funds, City Council was able to dedicate more CDBG funds toward local projects that cannot be paid for with HOME funds.

Needs for Public Housing

The Jackson Housing Commission (JHC) is the City's Public Housing Authority (PHA). The JHC manages 543 units of public housing in three Asset Management Projects and a Section 8 program of 475 participants. 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. Proceeds from

future sales will be used for good supporting housing purposes to include, but not be limited to, development of low-income housing.

- 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.

The waiting list for Section 8 housing is quite extensive, totaling 1,084 families for 475 units. Of those on the waiting list, 97% are extremely low-income (less than or equal to 30% area media income) households. Unfortunately, the waiting list for Section 8 housing has been closed for two years and only experiences a 21% turnover rate, which will allow only 9% of those families on the waiting list to attain Section 8 housing.

Public Housing has a waiting list of 295 families for 543 units and generally experiences a 24% turnover rate, which will allow approximately 44% of those families on the waiting list to attain public housing. Extremely low-income families make up 98% of Public Housing's waiting list.

The JHC received \$889,894 in Capital Funds Recovery Grant from the American Recovery and Reinvestment Act of 2009. The 40 single-family scattered site units remaining in the Home Ownership Plan will receive updates, including new roofs, water heaters, furnaces, windows and doors.

Barriers to Affordable Housing

The 2010 Analysis of Impediments to Fair Housing Choice lists the following barriers identified by the Jackson County Continuum of Care's Housing Committee:

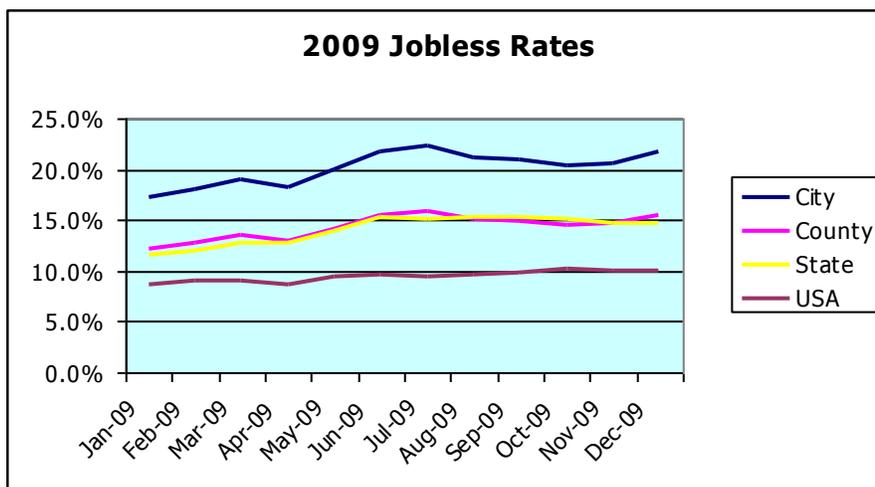
- Lack of resources/developers to create more affordable or low-income housing.
- Urban food deserts, which is the lack of grocery stores in low- and moderate-income areas. Residents oftentimes rely on local convenience stores, which generally charge significantly more for an identical item found cheaper 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, which people in the housing community often refer to as 'slumlords' or 'shady dealers'. 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) – over the past several years, NIMBY has become evident in the City, most recently resulting in homeowners lobbying their Councilmembers to change the definition of "family" in the zoning ordinance in an attempt to limit certain types of individuals from sharing living expenses (this ordinance change was eventually abandoned by City Council).

- Lack of housing for the 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.

The Jackson Interfaith Shelter, the largest homeless shelter in the City, identified the following issues:

- 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;
- Unable to afford public transportation or no routes established near work place;
- Unable to afford proper insurance, registration and licensing for their own vehicle;
- Unable to afford vehicle maintenance and repairs.

Further, the Human Relations Commission also indicated a lack of fair housing education and enforcement for several consecutive years has created an environment of potential discrimination issues and lack of understanding in the community. City Inspectors noted large families of five or more persons have difficulty finding housing with enough bedrooms as real estate investors purchased many of the City’s larger single-family homes and then converted them into two to four unit apartment buildings. The disabled population faces accessibility issues to affordable scattered site housing, severely limiting their residency choices. While availability of affordable housing units remains a high priority to the City when allocating its CDBG and HOME funds, the state and local economy has continued a downward trend with no significant recovery in the foreseeable future. As stated previously, during 2009 the jobless rate in the City ranged from 17.2% to 22.2% and has been at 19.9% and above since May 2009.



Due to the economic crisis, City inspectors are seeing an increase of multiple households sharing the same housing unit, creating overcrowded and dangerous living conditions.

HOME

The City of Jackson controls the resale of homebuyer property during the period of affordability using the recapture option. Should a homebuyer receiving a direct HOME subsidy sell the property during the affordability period, repayment of the entire direct HOME subsidy will be triggered. 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.

Jackson City Council made the following 2010-2011 HOME allocations:

Rehabilitation Assistance (RAP)	\$179,945
Administration (Community Development)	30,400
Down Payment Assistance	40,000
Administration (Jackson Affordable Housing Corp.)	6,000
CHDO Set Aside - Acquisition/Rehab/Resale	90,000
CHDO Operating Expenses	<u>18,000</u>
Total:	<u>\$364,345</u>

The Community Development Department will use HOME funds, in addition to CDBG funds, to subsidize its rehabilitation program, which has seen a significant increase in requests from low- and moderate-income homeowners to assist in repairing their residences. Currently, the City offers a \$20,000 maximum, 20 year deferred loan (to correct code violations) through its rehabilitation program; however, rehabilitation staff is reviewing current guidelines to determine if adjustments are needed to reflect the current economic and housing climate. A separate five-year forgivable loan is made available to address all lead issues during rehabilitation; there is no maximum limit to the amount of a lead loan. Administration fees will be used as program income for the CDBG program and become part of the CDBG budget.

Jackson Affordable Housing Corporation (JAHC) is the City's chosen Community Housing Development Organization (CHDO). As such, JAHC will receive no less than 15% of the 2010-2011 HOME entitlement grant to perform CHDO set-aside activities as a developer, namely acquisition/rehabilitation/resale. Rehabilitation conducted will meet the local rehabilitation standards outlined in Chapter 14 of the City of Jackson Code of Ordinances, and all other ordinance and zoning requirements as may apply. In order to accomplish this program, the City has allocated CHDO Operating Expenses at an amount less than 5% of the annual HOME entitlement grant, which is also less than 50% of JAHC's total operating expenses.

As a subgrantee, JAHC will also receive funding to provide Homebuyer Assistance in the form of closing costs, prepaids, down payment, or other financial assistance required for a family to purchase a home. JAHC also received administration fees to support staff and operating costs to conduct this activity.

Homeless

Specific Homeless Prevention Elements

The Jackson County Continuum of Care (CoC) received a \$164,100 Emergency Shelter Grant (ESG) from the Michigan State Housing Development Authority (MSHDA), which expired on March 30, 2010. The CoC applied for six months gap funding from MSHDA to continue programs until the 2010 ESG (now called Emergency Solutions Grant) NOFA is released, with funding expected to begin in October 2010. The programs supported by the current ESG and the gap between April 1, 2010 and September 30, 2010 are:

- Training and Treatment Innovations, Inc. (TTI) for Homeless Assistance Recovery Program (HARP).
- Aware Shelter, an emergency shelter for victims of domestic violence, to cover shelter costs.
- Community Action Agency for landlord/tenant mediation.
- A Continuum of Care coordinator.
- Community Action Agency for foreclosure prevention.
- The Salvation Army for its emergency needs department.

A Community Development staff member, who holds the co-chair position, regularly attends the monthly CoC meetings and participates in the Housing Committee and Discharge Planning Committee. The CoC is comprised of 20 to 30 other community service providers, representing both public and private interests. The meetings are utilized to provide consistency and support for those invested in addressing homelessness programming and resources. The City continues to work with the community and non-profit agencies to coordinate resources to prevent and eliminate homelessness by staff becoming more involved in service provider meetings such as Neighbors in Need, Income Community Solutions, and Emergency Needs Coalition.

Staff was also actively involved in the planning and implementation of the second Project Homeless Connect conducted by the CoC, which took place on November 20, 2009. With a small grant from the Michigan Coalition Against Homelessness, Project Connect 2009 was able to expand upon its first event in 2008, reaching more of the intended population and providing additional services. An exit interview conducted at Project Connect allowed for a Point in Time (PIT) count, which was entered into the County's HMIS. Results from the PIT count are as follows:

Number of guests served	254
Number of male guests	80
Number of female guests	140
Number of children (0 – 18 years)	34
Number of guests who stated they were homeless	87
Number of guests who stated they were	
doubled up	46
couch surfing	10
shelter	19
car/outside/hotel	12
Number of guests who stated they were unemployed	189

The event drew 130 volunteers and 50 service providers and offered the following services at no cost to the participants:

Service	# Guests Served
Completed SOAR Application	13
Shelter Reservations	7
Completed DHS Application	99
Commodity Food	250
Preventive Medical Care	40
Bicycle Repair	42
Bus Passes	35
Clothing Voucher	65
Court/Legal Screening/Legal Service	47
Credit Counseling	10
Employment Assistance	38
Eyeglass Repair	63
Haircuts	35
Housing Counseling	39
ID Assistance	23
Massage	17
Meals for the day	264
Mental Health Screening	25
Hygiene Kits	220
Substance Abuse Services	12

Students from Spring Arbor University attended the event to obtain footage for a documentary they planned. The Jackson Transportation Authority provided free bus rides to and from the event for anyone who identified where they were going. All in all, it was a wonderful event not only for the homeless, but also for the community members who volunteered to assist. Due to the success of the November 2009 Project Connect event, the CoC is currently planning another Project Homeless Connect event for July 23, 2010, and may possibly hold a second event before the end of 2010 or in early 2011.

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

Grace Haven	30 beds (homeless)
Interfaith Shelter	80 beds (homeless)
AWARE Shelter	19 beds at shelter; 48 transitional
CAA	12 TBRA vouchers, 159 transitional beds, 12 permanent supportive housing
Training & Treatment Innovations	27 permanent supportive housing
MPRI	25 transitional beds (prisoner re-entry)

The Michigan Prisoner Re-Entry Initiative (MPRI) is currently providing up to \$400 per month in rental subsidy for an average rental period of three months. It is the goal of MPRI to provide prisoners returning to society access to permanent, safe, and affordable housing, or services designed to help the individual achieve permanent housing (i.e., emergency shelter, transitional housing). Every returning prisoner will have access to stable employment or services designed to help secure stable employment (i.e., transitional employment, job seeking services).

A MSHDA representative attended the January 2010 CoC meeting to provide updated information on MSHDA vouchers. It was revealed Jackson County lost 20 HARP vouchers and 42 Housing Choice

Vouchers from its January 2009 levels and will likely not get them back. CoC members were shocked and quite concerned as the need for housing assistance has not diminished and is, in fact, increasing. The MSHDA representative stated the decision was made based on the County's waiting list for these types of vouchers. The CoC responded by informing the MSHDA representative the waiting lists have been closed for some time and, had they known in advance that such a critical decision would be made based on the waiting list, they would have opened the list back up so it would be more reflective of the need in the community.

In August 2009, the City received \$568,942 in Homelessness Prevention and Rapid Re-Housing Program (HPRP) funds under the American Recovery and Reinvestment Act of 2009. The City Manager approached a group of thirty local community service providers who had recently formed to make sure the community's basic needs were being met under a campaign called "The Jackson County Crisis Response for our Neighbors in Need" (Neighbors in Need). United Way of Jackson County is the fiduciary for Neighbors in Need and willingly offered to accept the role of facilitator for the HPRP grant. Through a Request for Proposal (RFP) process, United Way then contracted portions of the HPRP activities to any agency participating in Neighbors in Need or the CoC. A panel made up of both Neighbors in Need and CoC members vetted the RFPs. A significant amount of time was spent in developing and implementing the program, and providing technical assistance to the agencies receiving allocations to carry out eligible HPRP activities. After a month in nearly full operation, agencies were able to expend 10% of the total grant; by the end of April 2010, 31% of the total grant had been expended with the City of Jackson leading the state in obligating funds. Consequently, the program is having a positive impact on both program participants and area landlords.



Community Development

Community Development

Jackson City Council members were faced with an extremely difficult decision regarding 2010-2011 CDBG funds. On one hand, local city streets have fallen into such disrepair from declining revenue and budget concerns, the poor conditions have created significant deterioration in neighborhoods. On the other hand, the economy has taken such a downturn not only locally, but also nationally and globally, more and more residents need access to the programs offered to meet their basic needs. During preliminary allocations on March 9, 2010, the Council based its funding decisions on an estimate of formula allocation and, on April 27, 2010, made final allocations based on the actual funds to be received.

Outcome/Objective Legend			
	Availability/ Accessibility	Affordability	Sustainability
Decent Housing	DH-1	DH-2	DH-3
Suitable Living Environment	SL-1	SL-2	SL-3
Economic Opportunity	EO-1	EO-2	EO-3

Public Service

Project: Client Advocate Positions Agency: AWARE, Inc.	Target Area Survivors of Domestic Violence and Sexual Assault	Total Funding \$15,000
		Planned Units
Output: Improve access to services for domestic violence and sexual assault survivors		834
Indicator: Number of persons assisted with improved access to a service		834
HUD Outcome/Objective: (SL-1) Accessibility for the purpose of creating a Suitable Living Environment (05G Battered and Abused Spouses 570.201(e), LMC, 01 People)		

Project: Emergency Adult Dental Care Agency: Center for Family Health	Target Area LMI Adult City Residents	Total Funding \$20,000
		Planned Units
Output: Improve access of low- and moderate-income adult City residents to emergency dental care		1,100
Indicator: Number of persons assisted with improved access to a service		1,100
HUD Outcome/Objective: (SL-2) Affordability for the purpose of creating a Suitable Living Environment (05M Health Services 570.201(e), LMC, 01 People)		

Project: Families and Schools Together (FAST) Agency: Family Service & Children's Aid	Target Area Cascades and/or Frost Elementary Schools	Total Funding \$7,000
		Planned Units
Output: Prevention and parent-involvement program for elementary age children and their families, enhancing family function, preventing school failure and substance abuse		450
Indicator: Number of persons assisted with improved access to a service		450
HUD Outcome/Objective: (SL-1) Availability for the purpose of creating a Suitable Living Environment (05D Youth Services 570.201(e), LMC, 01 People)		

Project: Homeownership Counseling Agency: Jackson Affordable Housing Corporation	Target Area LMI Homeowners	Total Funding \$8,000
Planned Units		
Output: Provide homeownership counseling and direction for persons interested in home ownership		465
Indicator: Number of persons assisted with improved access to a service		465
HUD Outcome/Objective: (SL-1) Availability/Accessibility for the purpose of creating a Suitable Living Environment (05R Homeownership Assistance (not direct) 570.210(e), LMH, 04 Households)		

Project: King Center Summer Youth Program Agency: Parks & Recreation Department	Target Area CT 11	Total Funding \$40,000
Planned Units		
Output: Provide youth a broader view of new experiences, cultural experiences and educational components		400
Indicator: Number of persons assisted with improved access to a service		400
HUD Outcome/Objective: (SL-1) Availability for the purposes of Suitable Living Environment (05D Youth Services 570.201(e), LMC, 01 People)		

Project: Partnership Park After School Program Agency: Partnership Park Downtown Neighborhood Association	Target Area CT 6, BG 1	Total Funding \$5,000
Planned Units		
Output: Provide after-school activities for youth in the Partnership Park Neighborhood		35
Indicator: Number of persons assisted with improved access to a service		35
HUD Outcome/Objective: (SL-1) Availability for the purposes of Suitable Living Environment (05D Youth Services 570.201(e), LMC, 01 People)		

Project: Utility Shutoff Prevention Agency: The Salvation Army	Target Area LMI City Residents	Total Funding \$60,000
Planned Units		
Output: Allow families to keep their power or heat services active; assistance limited to one (1) time per year		123
Indicator: Number of persons assisted with improved access to a service		123
HUD Outcome/Objective: (SL-2) Affordability for the purposes of Suitable Living Environment (05Q Subsistence Payments 570.201(e), LMC, 01 People)		

Project: Central Michigan 2-1-1 Agency: United Way of Jackson County	Target Area LMI City Residents	Total Funding \$10,000
Planned Units		
Output: Provide information and referral services		3,500
Indicator: Number of persons assisted with improved access to a service		3,500
HUD Outcome/Objective: (SL-1) Accessibility for the purposes of Suitable Living Environment (05 Public Services (General) 570.201(e), LMC, 01 People)		

Total Allocation to Public Services: \$165,000 (10.2%)

Administration and Planning

Project: Administration and Planning Agency: Community Development Department	Target Area n/a	Total Funding \$249,700
Planned Units		
Output: Administration and planning of the CDBG program		n/a
Indicator: none required		
HUD Outcome/Objective: 21A General Program Administration 570.206		

Total Allocation to Administration and Planning: \$249,700 (15.5%)

Other Projects

Project: Code Enforcement Agency: Community Development Department	Target Area Eligible CDBG areas City-wide	Total Funding \$503,345
Output: Improved neighborhoods and properties		Planned Units 1,200 blight citations/
Indicator: Number of blight ordinance violations cited, rental inspections conducted, or LMI households assisted		952 initial rental inspections
HUD Outcome/Objective: (SL-3) Sustainability for the purpose of Suitable Living Condition (15 Code Enforcement 570.202(c), LMA, other)		

Project: Residential Rehabilitation Agency: Community Development Department	Target Area Eligible CDBG areas City-wide	Total Funding \$186,000
Output: Improved housing conditions		Planned Units 18
Indicator: Number of LMI households assisted		18
HUD Outcome/Objective: (DH-3) Sustainability for the purpose of Decent Housing (14A Rehab; Single-Unit Residential 570.202, LMH, 10 Housing Units)		

Project: Jobs Creation Initiative Agency: Community Development Department	Target Area City-wide	Total Funding \$50,000
Output: Offer loans to businesses to stimulate economic development		Planned Units 10
Indicator: Number of low/mod jobs created or retained		10
HUD Outcome/Objective: (EO-1) Accessibility for the purpose of Suitable Living Environment (18A ED Direct Financial Assistance to For-Profits 570.203(b), LMJ, 08 Businesses)		

Project: Code Enforcement Agency: City Attorney's Office	Target Area CDBG-eligible areas	Total Funding \$63,000
Output: Legal support to Community Development Department to improve neighborhoods and properties		Planned Units 100
Indicator: Number of citations receiving benefit of prosecutorial service or contract reviews		100
HUD Outcome/Objective: (SL-3) Sustainability for the purpose of Suitable Living Condition (15 Code Enforcement 570.202(c), LMA, other)		

Project: Handicap Curb Ramps Agency: Department of Public Works	Target Area City-wide	Total Funding \$20,000
Output: Improve accessibility for disabled and elderly residents		Planned Units 8
Indicator: Number persons assisted with improved access to an infrastructure benefit		8
HUD Outcome/Objective: (SL-1) Accessibility for the purpose of Suitable Living Environment (03L Sidewalks 570.201(c), LMA, 11 Public Facilities)		

Project: Street Paving/Reconstruction Agency: City of Jackson Engineering Department	Target Area CT 10, BG 1; CT 11; BG 1	Total Funding \$355,000
Output: Improve street surface		Planned Units 3 blocks
Indicator: Number of persons assisted with improved access to an infrastructure benefit		3 blocks
HUD Outcome/Objective: (SL-3) Sustainability for the purpose of Suitable Living Environment (03K Street Improvements 570.201(c), LMA, 11 Public Facilities)		

Project: Ash Tree Removal/Replacement Agency: Parks, Recreation & Grounds	Target Area CDBG-Eligible Areas	Total Funding \$14,000
Output: Remove and replace dead ash trees in the public right-of-way		Planned Units 70
Indicator: Number dead trees removed and replaced with different species		70
HUD Outcome/Objective: (SL-3) Sustainability for the purpose of Suitable Living Environment (03N Tree Planting 570.201(c), SBS, 11 Public Facilities)		

Project: Bathroom Renovation Agency: John George Home, Inc.	Target Area 1501 E Ganson, Jackson, MI	Total Funding \$10,000
Output: Improved resident safety by renovating shared bathroom to meet ADA codes		Planned Units 1
Indicator: Number of units made accessible for persons with disabilities		1
HUD Outcome/Objective: (SL-1) Accessibility for the purpose of Suitable Living Environment (14B Rehab; Multi-Unit Residential 570.202, LMH, 10 Housing Units)		

Total Allocation to Other Projects: \$1,201,345

While allocations to various non-profit agencies applying under the Public Service cap had to be scrutinized very carefully, City Council feels it provided funding to those agencies that will achieve the biggest impact on the community:

AWARE, Inc. – AWARE is the only emergency shelter in Jackson County specializing in providing services to survivors of domestic violence and sexual assault. While AWARE has been fortunate enough to recently receive several grants to provide specific services to its clients, including transitional housing, increased staff capacity was not among the activities eligible to receive funding.

Center for Family Health – Emergency Adult Dental Care – the Center for Family Health provides the only dental clinic in Jackson County that consistently accepts Medicaid and offers all services on a sliding discount. The targeted clients are low-income adults who have no other access to dental care and patients often present with severe dental problems.

Family Service & Children’s Aid – Families and Schools Together (FAST) – an innovative prevention and parent-involvement program in which families gather and participate in specific, fun, research-based activities aimed at strengthening families and empowering parents to guide their children toward success in school and in life. Goals include enhancing family functioning by strengthening the parent-child relationship, prevent school failure by improving a child’s performance and behavior in school and increase the family’s affiliation with the school, prevent substance abuse in children and families by increasing knowledge and awareness, and reduce stress parents and children experience in daily situations.

Jackson Affordable Housing Corporation – Homeownership Counseling – helps to facilitate group counseling at the Homeownership Workshop Program provided through the Michigan State University Extension Program, and one-on-one counseling by Jackson Affordable Housing staff.

Parks & Recreation Department – King Center Summer Youth Program – a youth program proven to be extremely successful and beneficial to approximately 400 low- and moderate-income City youths. Participating youths are exposed to cultural and educational field trips, summer

reading, life skills learning, and free health and hygiene services. In addition, breakfasts and lunches are provided to the participants, and over 30 college and high school students receive work experience, mentoring and job training while assisting with the program.

Partnership Park Downtown Neighborhood Association – Partnership Park After School Program – collaboration with Catholic Charities to provide after-school activities for youth in the Partnership Park Neighborhood two evenings a week. Children receive assistance with homework and participate in other educational activities, workshops designed to teach life skills, learning to give back to the community, and time for recreation.

The Salvation Army – Utility Shutoff Prevention – assistance is provided to families one-time per year to prevent the shutoff of electrical and gas utilities. Assistance is provided in collaboration with Department of Human Services and other organizations when funds are available.

United Way of Jackson County – Central Michigan 2-1-1 – free information and referral service established to respond to callers who need non-emergency health and/or human service assistance.

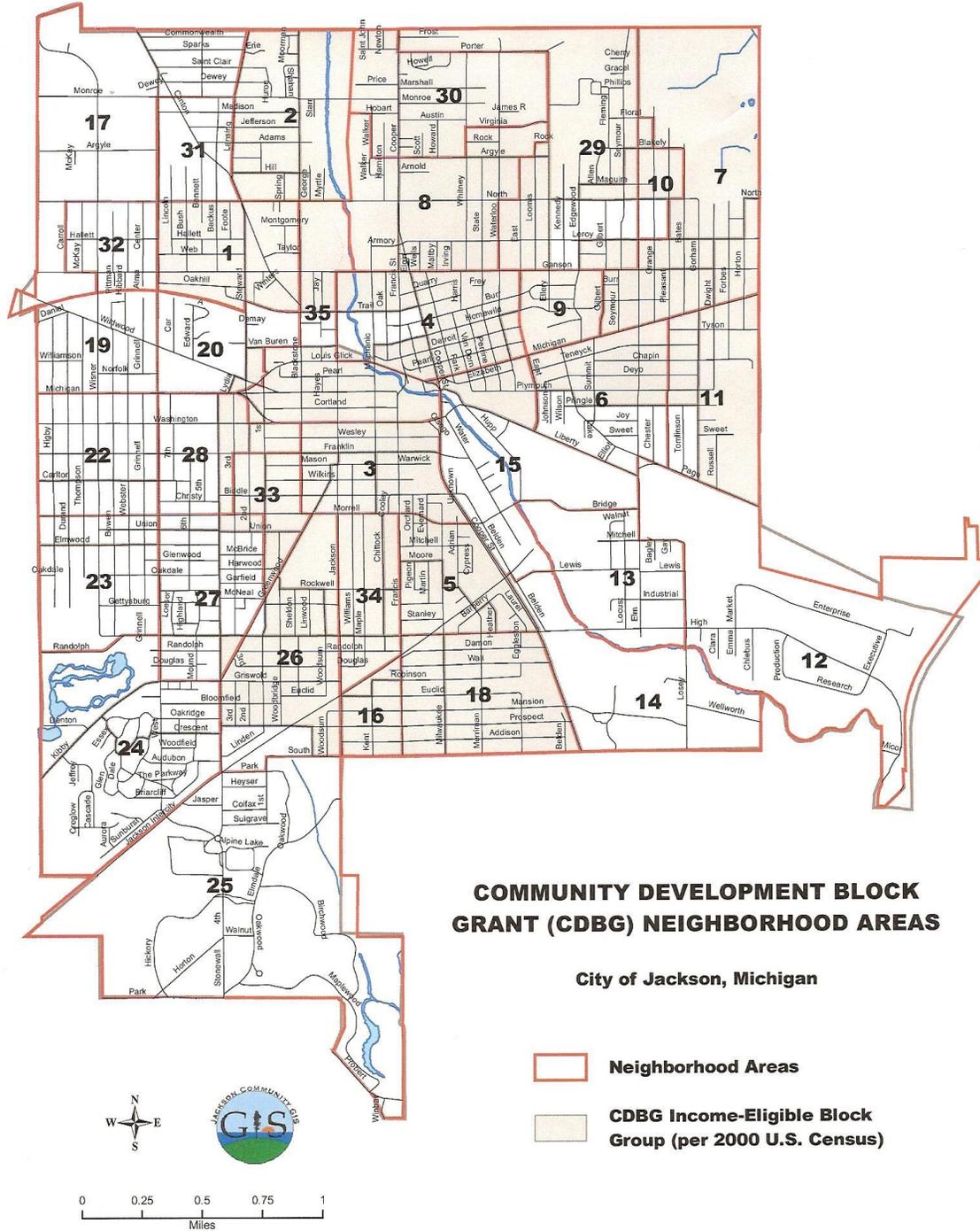
The Community Development Department is charged with not only administering the CDBG and HOME grants, but also Code Enforcement, Jobs Creation Initiative and Residential Rehabilitation. The Code Enforcement budget pays for staff and operating costs to perform various duties such as blight ordinance enforcement, rental housing inspections and tasks related to rehabilitation loans. The City Attorney's Office provides legal support in the form of prosecutorial services in the Administrative Hearings Bureau for blight and housing citations, and reviews and authorizes loan documents and other similar contracts before they are entered into.

Because of the current economic and housing climate, the Department has experienced a significant increase in requests from low- and moderate-income homeowners to assist in rehabilitating their residences. Currently, the City offers a \$20,000 maximum, 20 year deferred loan (to correct code violations) through its rehabilitation program; however, rehabilitation staff is reviewing current guidelines to determine if adjustments are needed to reflect the current economic and housing issues. A separate five-year forgivable loan is made available to address all lead issues during rehabilitation; there is no maximum limit to the amount of a lead loan. Emergency Hazard funds are available in the form of a maximum \$10,000, 20-year deferred loan to correct issues of urgent needs, such as defective furnaces, roofs, etc.

The City's Engineering Department received funds for street paving/reconstruction. Examples of the streets being considered for paving/reconstruction during the 2010-2011 fiscal year are:



Every intersection of these paving projects will receive a handicap accessible curb ramp. The Department of Public Works (DPW) received a companion allocation for the installation of handicap ramps in other areas of the City as required by 28 CFR 35.150(d)(2). DPW staff has consulted with disAbility Connections, a local non-profit agency supporting disabled Jackson County residents in their efforts to live independently, for priority placement of the curb ramps.



The John George Home provides housing for 33 extremely low-income and two very low-income elderly gentlemen, some of whom have resided there for 30 years. During the past two funding cycles, the John George Home received CDBG funding to install a new elevator to provide second

floor access for emergency services personnel and those residents too fragile to negotiate stairs and a new, enclosed stairwell. The stairwell replaced the old, exterior metal grate fire escape that could not be navigated by the elderly residents. In keeping with upgrading the facility to improve accessibility for its disabled residents, the John George Home will be renovating a shared bathroom to make it ADA compliant.

Antipoverty Strategy

HUD annually releases area median income limits based on information specific to the community. HUD's FY 2010 Median Family Income estimates (soon to be released) make more extensive use of American Community Survey data than previously, although local Bureau of Labor Statistics (BLS) wage data continue to be used to influence estimates for areas of less than 65,000 in population. All estimates are projected forward from 2006 to April 1, 2008, using an annual trend factor of 3.5 percent. Except for minor modifications, HUD continues to use the same area definitions used in FY2006. ([http://www.huduser.org/datasets/il/il2008/2008MedCalc.odn?parms\\$](http://www.huduser.org/datasets/il/il2008/2008MedCalc.odn?parms$))

City of Jackson 2009 Area Median Income Limits

% of Median	Limit per Number of Persons in Household							
	1	2	3	4	5	6	7	8
30%	12,550	14,300	16,100	17,900	19,350	20,750	22,200	23,650
50%	20,900	23,900	26,850	29,850	32,250	34,650	37,000	39,400
60%	25,080	28,680	32,220	35,820	38,700	41,580	44,400	47,280
80%	33,450	38,200	43,000	47,750	51,550	55,400	59,200	63,050
100%	41,800	47,800	53,700	59,700	64,500	69,300	74,000	78,800
115%	48,070	54,970	61,755	68,655	74,175	79,695	85,100	90,620
120%	50,160	57,360	64,440	71,640	77,400	83,160	88,800	94,560

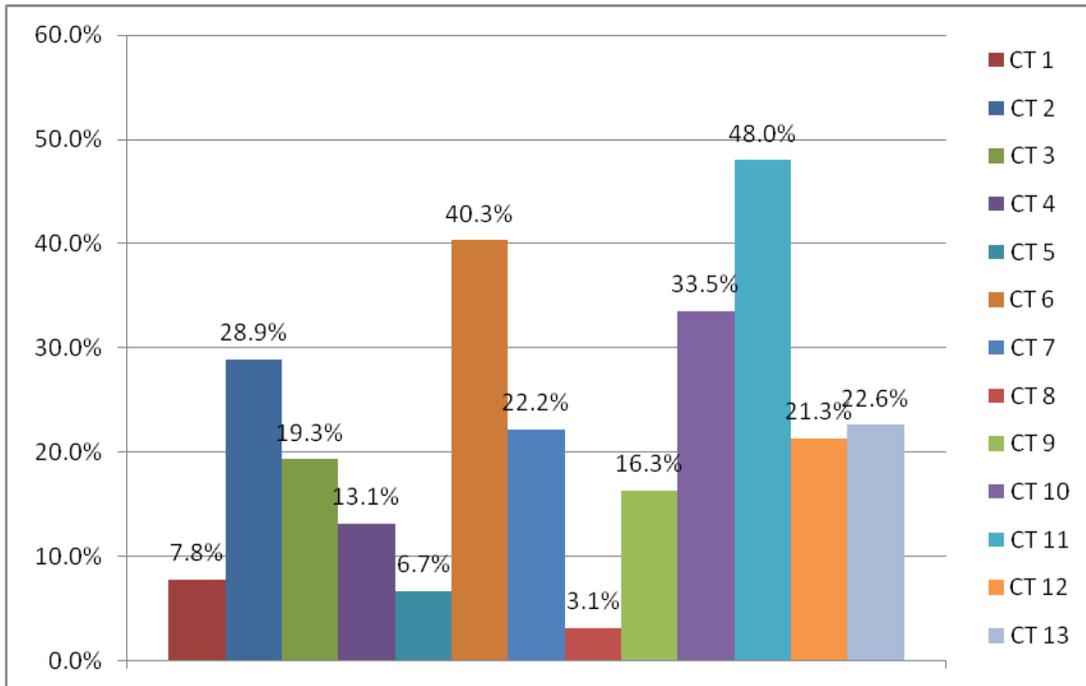
(effective March 2009 – 2010 income limits not released as of April 28, 2010)

The Federal Financial Institutions Examination Council (FFIEC) published Summary Census Information based on estimates in 2008. The 2008 HUD Estimated Median Family Income for the County of Jackson is \$57,100; only Census tract 8 in the City surpassed that amount by recording an estimated Median Family Income of \$76,331.

CT	Percent Minority	Percent Below Poverty	2000 Median Household Income	2000 Median Family Income	2008 Est. Median Family Income
1	12.04%	7.84%	\$35,075	\$40,230	\$45,075
2	28.35%	28.93%	\$20,357	\$26,548	\$29,743
3	16.51%	19.35%	\$25,745	\$35,682	\$39,981
4	12.52%	13.06%	\$34,640	\$38,115	\$42,705
5	11.49%	6.74%	\$40,577	\$47,177	\$52,857
6	30.03%	40.29%	\$ 9,932	\$21,728	\$24,347
7	21.86%	22.16%	\$25,431	\$32,917	\$36,881
8	9.83%	3.09%	\$50,246	\$68,125	\$76,331
9	21.17%	16.30%	\$35,912	\$41,480	\$46,479
10	48.32%	33.53%	\$24,107	\$26,213	\$29,372
11	80.09%	48.04%	\$15,636	\$16,847	\$18,877
12	24.96%	21.30%	\$32,545	\$40,912	\$45,840
13	62.74%	22.64%	\$30,333	\$35,491	\$39,764

Source: 2008 FFIEC Census Report

Based on this information, approximately 21.8% of the City's residents live at or below the poverty level, with two of the highest concentrations in Census tracts 6 and 11, where the average number of residents living at or below the poverty level is over 40%.



Poverty Rates by Census Tract

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 Community Development 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 Community Development Department to expedite the correction of hazardous conditions (e.g. leaking roof, non-working furnace, etc.).

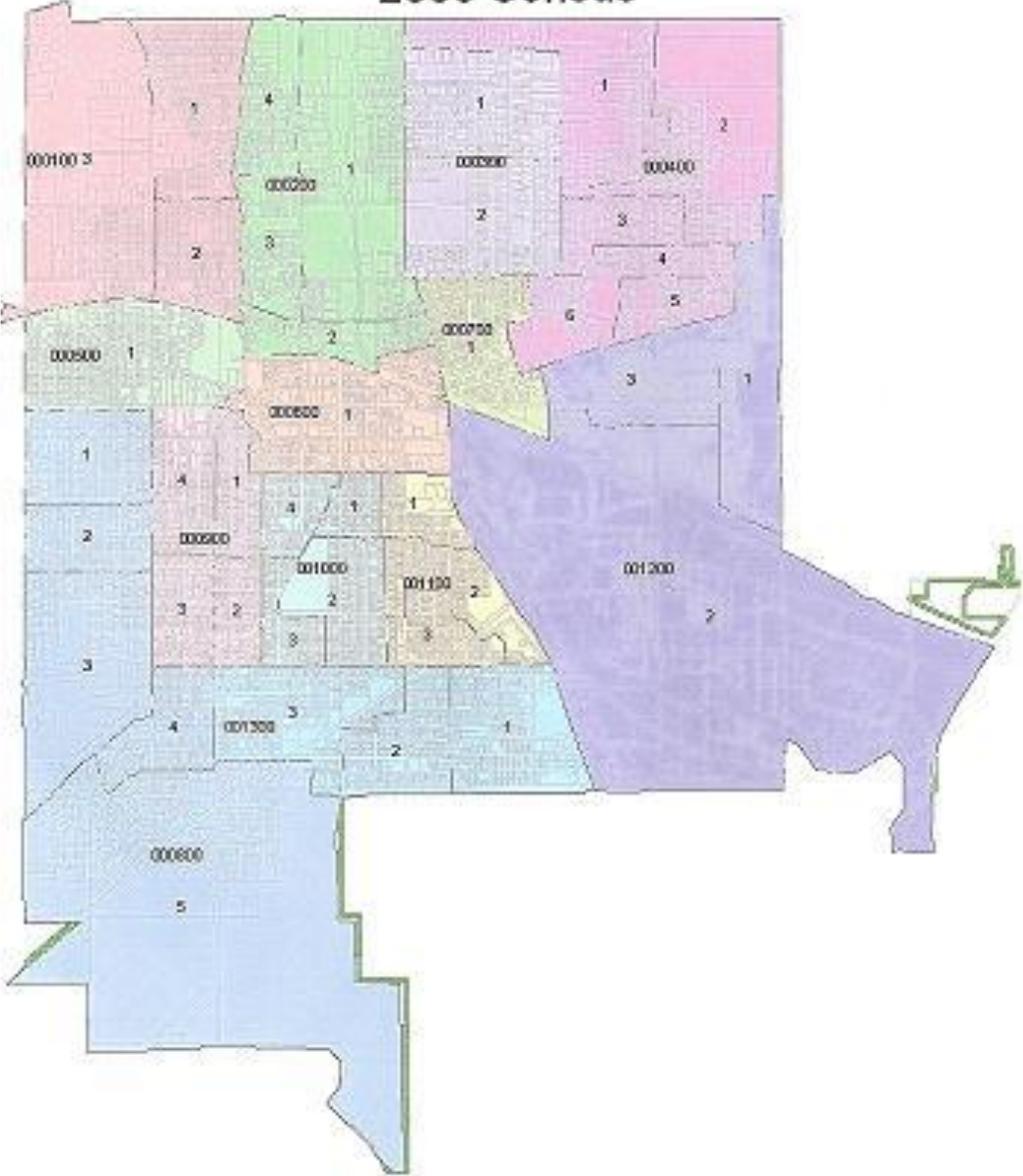
Jobs Creation Initiative – incentive-based financing to for-profit businesses that hire and/or train low- and moderate-income City residents.

Down Payment Assistance – closing costs, prepaids, down payment, or other financial assistance required for a family to purchase a home. All persons receiving down payment assistance must attend homeownership counseling, which provides information not only on the purchase probes, but also in the readiness process, such as budgeting, credit, income versus debt, etc.

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.

The Jackson Housing Commission offers a Family Self-Sufficiency Program to public housing residents by providing an escrow account whereby a portion of their rent is deposited and can be withdrawn after successful completion of the program and used as a down payment on their first home. Enrollees are encouraged to set goals of pursuing education, job training, or employment. To assist program participants in obtaining their goals, transportation, childcare, clothing, and counseling services are provided.

City of Jackson, Michigan Census Tracts - Block Groups 2000 Census



Non-Homeless Special Needs Housing

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, several ramps have been installed for disabled homeowners by disAbility Connections, the Rotary Club, and World Changers. The Council also routinely waives permit fees for World Changers and/or Mission Serve roofing projects.

When undergoing a rehabilitation project, the City of Jackson and its subrecipients take into consideration the needs of the current homeowner. For instance, one elderly woman wanted to stay in her long-time home but the only bathroom was on the second floor. Due to her declining mobility and confirmation of a poor prognosis for recovery from her doctor, when the home was rehabilitated a first floor room was converted into a second bathroom to enable her to stay in the home. Every effort is made during the rehabilitation process to take into account any special needs of the occupant to increase the likelihood of longer-term occupancy and livability.

While a few affordable apartment complexes exist in the City which are equipped to meet needs of the elderly and disabled, they are located within close proximity to each other, limiting location choices especially for the disabled. While some disabled tenants have had success in working with landlords to retrofit a housing unit for accessibility, oftentimes once that tenant moves out, the retrofitting is also removed making the unit inaccessible for another potential tenant with disabilities.

Families requiring more than two to three bedrooms also have difficulty locating rental housing options. There are many residential structures throughout the City that may at one time have been an option; however real estate investors depleted this stock through the years by converting these larger homes into multi-unit dwellings, usually with only two to three bedrooms per unit. Chapter 28, Section 28-125 of the City of Jackson Code of Ordinances provides that should a non-conforming structure not been used for a period of 18 months, it shall be deemed abandoned and the structure then reverts to the uses allowed in that specific zoning district. However, the City has neither the staff nor methods in place to monitor structures for abandonment. This would be one way in which the City could return larger single-family dwellings to their original intended use, increasing housing options for families of five or more.

Summary

As demonstrated in the preceding pages, the City of Jackson is dedicated to serve its citizens to the best of its ability with entitlement grant funds stretched thin. The needs of the City are great in an attempt to stay afloat – not only for its citizens, but also for the City's basic service requirements. Spending of Program Year 2009 CDBG funds is well ahead of years in the recent past:

Program Year	End Date	Ratio
2006	6/30/07	1.19
2007	6/30/08	0.97
2008	6/30/09	1.11
2009	4/30/10*	.93

**Many reimbursement requests are made quarterly; significant additional draws are expected in July 2010.*

It is anticipated that by June 30, 2010, the ratio for Program Year 2009 will be .80 or lower.

No one area has taken precedence over another; City Council members attempted to fund those projects that would provide the biggest impact on the community as a whole. City leaders are committed to maintain expectation levels of the community while coping with reduced work staff through job elimination, attrition, and wage concessions made by all City staff in the form of furlough time. The community understands and is responding to a reduction of services by volunteering to assist in ways they are able to in order to keep Jackson a vital community in which to live.

Appendix A

Citizen Comments

January 26, 2010 Public Hearing

Project	Comment	Accepted	Not Accepted	Reason
Allegiance Health Systems Cab Transportation Assistance	A citizen spoke on behalf of this activity to reiterate its importance and need by the community			
American Red Cross Emergency Services Program	The Community Preparedness Director and Executive Director addressed City Council and urged funding support			
AWARE, Inc. Client Advocate Positions	The Executive Director explained the need for support to implement programs funded by several grant sources, none of which could be used for staffing			
Center for Family Health Emergency Adult Dental Care	A staff dentist outlined the need for continued support of this activity			
Center for Women Earn While You Learn	The Executive Director discussed the incredible increase this activity has experienced during the past year			
Elnora V. Moorman Community Help Center Community Help Center Funding	Three persons associated with the Community Help Center described their visions and spoke of Elnora Moorman's legacy with the City			
Family Service & Children's Aid FAST Program	The success of the program and the impact it had on families was relayed by the Director, who requested continued funding			
Jackson Affordable Housing Corp. Foreclosure Prevention Homeownership Counseling Down Payment Assistance	The Executive Director of JAHC requested continued funding for all programs as the need for these services remain in existence			
Jackson School of the Arts Access to Arts for All Children	Early education to the arts and the impact it can have on a community's youth was expressed by the Executive Director			
Parks & Recreation King Center Summer Youth Program	The King Center Supervisor explained to City Council the continued growth and success of the program and the impact it has on the City's youth			
LifeSpan . . . A Community Service People in a Caring Community	The Executive Director explained the need to purchase two new wheelchair-accessible vans to replace aged fleet and continue providing transportation services to the disabled population			
Partnership Park Downtown Neighborhood Assoc. After School Program	The Director of the After School Program, a youth who currently participates in the program, and a neighborhood citizen			

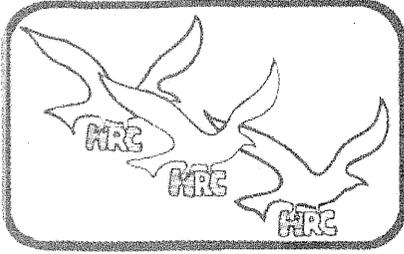
Project	Comment	Accepted	Not Accepted	Reason
The Salvation Army Utility Shutoff Prevention	The commanding officer of The Salvation Army discussed the increased need of low- and moderate-income residents for assistance is keeping utilities on in their homes			
United Way of Jackson Co. Central Michigan 2-1-1	An information and referral specialist from the call center described the increase in calls being received requesting help in meeting basic needs, many of which are from people who have never needed access to community services			
Community Development Administration Residential Rehabilitation Code Enforcement Jobs Creation Initiative	The department Director explained each funding request; which ones pertained to staffing and operational costs to administer the grant and continue services; the increased need for rehabilitation assistance, especially requests for help to eliminate emergency hazard conditions; and the benefit of continuing economic development activities			
Dept. of Public Works Handicap Curb Ramps	The department Director encouraged City Council to continue funding this program to meet requirements of 28 CFR 35.150(d)(2) and provide additional mobility access to the disabled population			
Dept. of Engineering Street Paving/Reconstruction	The City Engineer reiterated the level of deterioration of many local streets, the City not having funding of its own to fix them, and the continued need for CDBG funding to make infrastructure improvements			
Forestry Ash Tree Removal/Replacement	The City's grounds supervisor requested City Council consider continued funding of removal of dead or dying ash trees in the public right-of-way, and replacement with different tree species			
John George Home Bathroom Reconstruction	The Executive Director of the John George Home described the hazardous conditions of the first floor shared bathroom in this home for elderly men, which was causing numerous falls per week, and requested funding to convert to an ADA-compliant bathroom.			
Renovations Your Way New Housing Construction	The owner of Renovations Your Way urged City Council to consider his application for HOME funds to construct two new 4-unit townhouses in the City			
Community Action Agency	The Neighborhood Development Director			

Project	Comment	Accepted	Not Accepted	Reason
Greenwood Housing Development	outlined the planned development and other sources of funding it will seek in addition to City HOME funds			
Habitat for Humanity New Housing Construction	The Executive Director requested funding from HOME to continue new housing construction for low-income families			

The Chairperson of the Human Relations Commission (HRC) addressed City Council and, based on a review of applications and discussion at the January 20, 2010 HRC meeting, presented the HRC's funding recommendations. A copy of the Memorandum from the HRC to the Mayor and City Council outlining those recommendations is attached.

Action Plan

No citizen comments were received regarding the Annual Action Plan.



CITY OF JACKSON

HUMAN RELATIONS COMMISSION

161 W. MICHIGAN AVENUE

JACKSON, MICHIGAN 49201

PHONE: (517)788-4167

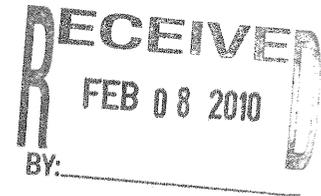
FAX: (517) 768-5820

MEMO TO: Honorable Mayor and City Council Members

FROM: Kathleen Conley, Chairperson *K.C/Fw*

DATE: February 6, 2010

SUBJECT: CBGD Recommendations



As per my comments at the City Council meeting on January 26th, the following are organizations we desire to be as fully funded as possible for the CDBG grant cycle 2010 are as follows:

American Red Cross: Their service to city residents in crisis is vital to the immediate well being of families impacted by disasters in their home. Allowing persons who have lost their home a few days of shelter and clothing for the immediate future ensures that families can remain together and take the time they need to plan for their survival.

Fair Housing Center of Southeastern Michigan: The Fair Housing Center of Southeastern Michigan took it upon themselves to ensure that Jackson County did not go without resources for persons who suspected they had been treated unfairly in a housing transaction. Fair housing testing provides an irreplaceable resource to families and individuals who have been asked to leave their home, not allowed to secure housing for which they are qualified, denied a mortgage or sold a mortgage that is not in their best interest, etc., because of their protected status. The organization requesting funding is a tried and true steward of federal, state and local funds, who has a track record of success in their investigation and litigation of cases. It is our duty as a community who receives CDBG funding to affirmatively further fair housing.

King Center Summer Youth Program: This program allows youth from our city to expand their horizons while also ensuring that they are in a safe place during the summer time when many young people who are idle fall into bad habits. It has shown itself to be a popular resource for Jackson parents who strive to ensure their kids have access to arts and cultural educational experiences.

Partnership Park Downtown Neighborhood Association: This program allows youth access to experiences that ensure their academic success. It is a vital resource to parents who want to provide their children an after school opportunity to learn and grow in a safe place.

The Salvation Army: The utility program that Salvation Army provides through their agency literally impacts hundreds or lives in our community. Ensuring that people have working utilities causes families to be able to remain in their homes, makes it easier for kids to concentrate in school, ensures adults can maintain employment or school scheduling, etc. Left unfunded or under funded, this would cause the quality of life for many Jackson residents to be unbearable.

Department of Public Works (Curb Cuts): Many people in our community depend on easy access to sidewalks in our city. Parents with strollers, people using assistive devices, and the elderly need to navigate the city safely and easily; curb cuts are the answer.

The organizations we desired to be as fully funded as possible for HOME:

Community Action Agency Greenwood Housing Development: This project would provide much needed quality low-income housing in our city. The retail space built into the project would allow for entrepreneurs from our area to expand their horizons. The area which is slated for the project would benefit from the development in that it would beautify the neighborhood.

Commissioner Parrish Stahl, who is employed with disAbility Connections, also noted that Lifespan...a Community Service fills a vital need for the disabled community and would prefer to see this grant given as full funding as possible.

Thank you for your consideration of our requests and thank you for making this difficult decision for our community.



Department of Community Development

161 W. Michigan Avenue • Jackson, MI 49201-1303•
Facsimile (517) 780-4781

Administrative Services
(517) 788-4060

Building Inspection
(517) 788-4012

Rehabilitation Services & Information
(517) 788-4070

To: Christopher W. Lewis, Interim City Manager
DATE: February 1, 2010
FROM: Carol L. Konieczki, Community Development Director
SUBJECT: City Administration Recommendations for CDBG/HOME Allocations

Thank you for meeting with Community Development staff and the City Clerk on January 28, 2010 to formulate recommendations to the City Council for CDBG and HOME allocations for fiscal year 2010-2011. The continuing economic struggles in the City made this year's recommendation decisions especially arduous. During our meeting, we reviewed each funding request using an Application Rating System; however, when it came right down to it, difficult decisions had to be made in order to attain goals set forth by City Council in April 2008. It is possible the City will receive a slightly larger entitlement grant than what is anticipated; however, our recommendations were based on the estimated amount based on historical allocations.

It is with deep regret to those agencies that also desperately need funding support that we arrived at the following decisions:

CDBG

Public Services – cannot exceed \$219,955

AWARE, Inc.	\$22,189
The AWARE shelter has been fortunate to receive several grants this year to assist domestic violence and sexual assault survivors; however, none of it is available for staffing.	
Center for Family Health	20,000
Continue providing funding for the emergency adult dental care program as it is valuable to the community; however, based on concerns during the past two annual monitoring visits, a reduced amount is recommended to be allocated.	
Family Service & Children's Health	10,000
Administrative staff felt it was important to continue to fund this very valuable, proven program. Not enough grant funds to provide the full amount requested.	
Jackson Affordable Housing Corp. (JAHC) – Homeownership Counseling	9,200
JAHC continues to meet performance and outcome goals with this program, which fills a need in the community.	



King Center Summer Youth Program	\$40,000	
The continuation of this very successful program was deemed vital to the development of the City's low- to moderate-income youth.		
Partnership Park Downtown Neighborhood Association	5,000	
The continued expansion and growth of this after school program demonstrates the success and need of youths in the Partnership Park Neighborhood.		
The Salvation Army	50,000	
Requests for assistance from low- and moderate-income residents has increased significantly due to the current economy.		
United Way of Jackson County	10,000	
The need to continue supporting this vital information and referral service has been demonstrated through increased calls for assistance.		
Subtotal Public Service Recommendation (11.4%):		\$166,389

Administration and Planning – cannot exceed \$293,723

Community Development Department	\$249,700	
Staffing and operation costs to administer the CDBG grant. An allocation less than requested would require cuts in staffing/services.		
Subtotal Administration and Planning Recommendation (17%):		\$249,700

Other Projects

Community Development Department		
Code Enforcement	\$565,275	
Staffing and operation costs to perform blight ordinance enforcement, housing maintenance code enforcement, and specification writing and oversight of the rehabilitation program. An allocation less than requested would require cuts in staffing and services.		
Residential Rehabilitation	200,000	
Includes funding for emergency hazard loans, which cannot be paid for from HOME program funding.		
Jobs Creation Initiative	50,000	
Provide funding for loans to create or retain jobs by a for-profit business investing in new construction, rehabilitation or expansion of its business.		
Engineering	225,000	
Funding for street reconstruction with water main upgrades on Forest (bend to Edgewood) and Homewild (Ellery to Edgewood).		
John George Home	10,000	
Provide a safe, ADA compliant bathroom for the elderly residents, alleviating the current conditions causing numerous falls each week.		
Subtotal Other Projects Recommendation:		<u>\$1,050,275</u>

Total CDBG Recommendations Based on Estimated Funding: \$1,466,364



Community Development has slashed funding requests for Administration/Planning, Rehab and Code Enforcement to absolute bare minimums. Administration/Planning and Code Enforcement fund current staff and operating costs. Building Inspection is funded from the General Fund.

HOME

Community Housing Development Organization (CHDO) – must be at least 15% (\$49,407)

Jackson Affordable Housing Corp. \$70,000
Acquisition of single family home, rehabilitation and resale to low- to moderate-income family.

CHDO Operating Expenses (optional) – cannot exceed 5% (\$16,469)

Jackson Affordable Housing Corp. 14,000
Staffing and operational costs to perform CHDO activities.

Subtotal CHDO Recommendation: \$84,000

Administration and Planning – cannot exceed 10% (\$32,938)

Community Development Department \$26,900
Staffing and operational costs to administer the HOME grant.

Jackson Affordable Housing Corp. 6,000
Staffing and operational costs to administer Down Payment Assistance Program.

Subtotal Administration Recommendation: \$32,900

Other Projects

Community Development Department
Rehabilitation Assistance Program \$172,478
Provide funding for rehabilitation loans to qualified homeowners to bring current residence up to local code.

Jackson Affordable Housing Corp. 40,000
Down Payment Assistance Program
Payment of costs associated with home buying, such as down payment assistance, closing costs, etc.

Subtotal Other Projects Recommendation: \$212,478

Total CDBG Recommendations Based on Estimated Funding: \$329,378

While Residential Rehabilitation was reduced on the CDBG side, it was increased utilizing HOME Program funds, allowing for allocation of more CDBG funds towards projects that cannot be paid for with the HOME grant.

Keeping in mind City Administration recommendations are based on amounts estimated to be received, and the possibility of the City receiving slightly larger grants than expected, we



encourage City Council to consider the following recommendations should the City receive additional funding:

CDBG Public Service – cannot exceed 15% of total CDBG grant

AWARE, Inc. – City Administration arrived at an allocation of nearly one-half of the requested amount. AWARE has received several grants to provide very specific program delivery to domestic violence and sexual assault survivors, but no additional money for staffing to deliver the programs. AWARE's original request of \$45,584 amounts to only 36.7% of total estimated project cost. Consider a larger allocation if funding allows.

Family Service and Children's Aid – The FAST program is very well run and a proven success, and Family Service & Children's Aid has demonstrated excellent performance during monitoring visits. However, as with the other allocations, and especially staying within the 15% public service cap, consideration was given to provide an allocation smaller than requested to reserve funds for other projects. This activity should also be considered for a larger allocation if funds allow.

The Salvation Army – Due to the current economy, more residents are requesting assistance to keep their utilities on. With this program, participants may receive assistance only once during a 12-month timeframe. Should additional funds become available and the City stays within the 15% public service cap, additional funding is recommended.

United Way of Jackson County – Also caused by the City's economic crisis, Central Michigan 2-1-1 is receiving a significant increase in calls, many times from persons who have never had to rely on assistance from non-profits and other agencies addressing basic needs. If available, an increase to the allocation recommended by City Administration staff would be appropriate.

CDBG Other Projects

DPW Curb Ramps – Unspent funds from 2008-2009 and 2009-2010 remain; curb ramps will be installed as part of several local street reconstruction activities planned in 2010. City Administration recommends no funding for the 2010-2011 program year unless additional grant funds are received.

Forestry – Ash Tree Removal/Replacement – City Administration staff felt other projects would fulfill more essential services at this time than would additional tree removal/replacement. However, should additional grant funds become available, Council should consider an allocation to continue this neighborhood beautification project.

No Funding Recommended

For various reasons, City Administration staff recommended no funding for several projects. While all would serve a needed service or activity to City residents, with limited funding and a continued focus on fixing local streets, based on City Council's April 15, 2008 goal setting session, not all can receive an allocation.



Allegiance Health Emergency Room – While transportation would meet a basic need, City Administration staff felt Allegiance Health would have other funding sources available to continue this service.

American Red Cross – City Administration staff felt providing funding to assist City residents with disaster relief (usually after a fire) is extremely vital; however, in order to allocate enough funding to Engineering for local streets, we decided against funding this activity. The American Red Cross has proved itself in program delivery and required recordkeeping during monitoring visits.

Center for Women Pregnancy Counseling Services – City Administration staff felt this was a good program for pregnant women and infants, but does not recommend funding at this time.

Elnora V. Moorman Community Help Center – City Administration staff appreciates the services this new agency wants to provide to City residents, however, they are duplicative in nature to services already being provided by experienced non-profits.

Fair Housing Center of Southeastern Michigan – The Analysis of Impediments to Fair Housing Choice recommends providing annual funding for fair housing activities to the Fair Housing Center of Southeastern Michigan. City Administrative staff identified unspent CDBG funds from prior years that can be reallocated for this purpose.

Jackson Affordable Housing Corp. – Foreclosure Prevention – No funding was recommended for the 2010-2011 program year as approximately \$20,000 remains unspent from program years 2008-2009 and 2009-2010.

Jackson School of the Arts – While it is undeniable this project would provide wonderful experiences to the City's youth, there were not enough funds available to consider an allocation that would provide a benefit to the activity.

LifeSpan . . . A Community Service – While this agency provided documentation of its aging vehicle fleet, City Administration staff felt the risk due to depreciation or loss through an accident or mechanical failure was too great to risk funding at this time.

Community Action Agency – CAA requested \$297,000 (90% of the anticipated annual allocation) to assist in funding a project to create 18 rental units on Greenwood Avenue. There were several considerations taken when reviewing this application:

- The City has historically encouraged projects designed to promote homeownership over creation of additional rental units;
- When completed, the project would likely remain owned by CAA - being a non-profit, they are exempt from paying property taxes;
- HOME regulations require a long-term affordability period of 20 years with significant administrative oversight and recordkeeping on the part of both parties;
- HOME regulations require a minimum of 15% of the total grant be set-aside for CHDO activities;



- HOME funds cannot be used as non-federal match in obtaining additional funding, as planned by CAA.

Renovations Your Way – The applicant has no other source of funding for this project and lacks the knowledge and experience required to remain in compliance (see CAA requirements above). The application also showed a need for additional, in-depth planning. HOME regulations require the City to conduct oversight of rental projects by analyzing the projects for financial stability, management capacity, and other long-term viability issues to identify financial/management issues before they affect the project's ability to remain a viable component of the City's housing stock. The application, as received, did not meet this requirement.

Greater Jackson Habitat for Humanity – While Greater Jackson Habitat for Humanity has been a recipient of both CDBG and HOME funds in the past, it is under new direction and staffing. A recent monitoring visit revealed several issues that need correction, including accurate reporting for HUD. Community Development staff is working with Habitat staff to get these issues corrected, but until Habitat demonstrates it is capable of program delivery, no additional funding is recommended at this time. Habitat has a small amount of unspent HOME funds from 2008-2009 remaining to use.

As always, the amount of requests far exceeded the amount of funds which will be available through CDBG and HOME grants. City Administrative staff considered each application carefully based on past performance and meeting the immediate needs of City of Jackson's residents or City Council's goals.

cc: Heather Soat, Financial Analyst
Michelle L. Pultz, Community Development Project Coordinator
Lynn Fessel, City Clerk



Appendix B

City Council Resolution

Dated May 11, 2010

RESOLUTION

BY THE CITY COUNCIL:

WHEREAS, the City of Jackson, Michigan has prepared a One-Year Action Plan in order to procure federal funds under the Housing and Community Development Act of 1974, as amended in 1983 and 1988, and the Cranston-Gonzalez National Affordable Housing Act of 1990; and,

WHEREAS, the City of Jackson, Michigan is required by law to provide certain assurances and certifications to the United States Department of Housing and Urban Development (HUD) as part of said procurement; and,

WHEREAS, the City of Jackson, Michigan has in place and is following a Citizen Participation Plan as required by HUD.

NOW, THEREFORE, BE IT RESOLVED, that the One-Year Action Plan is adopted and approved, the Mayor, as the official representative of the City, is authorized and directed to execute the submission of said Plan for and on behalf of the City of Jackson, Michigan, and the Mayor and the Community Development Department are authorized to provide such additional information as may be required and to submit said Plan to HUD;

BE IT FURTHER RESOLVED, that the City of Jackson, Michigan hereby assures and certifies that it will comply with the regulations, policies, guidelines, and requirements with respect to the acceptance and use of federal funds for these federally-assisted programs, and the City of Jackson, Michigan gives assurances and certifies that, with respect to the Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME):

- A. It possesses legal authority to make a grant submission and to execute a community development and housing program.
- B. Its governing body has duly adopted or passed as an official act a resolution, motion, or similar action authorizing the person identified as the official representative of the grantee to submit the One-Year Action Plan and amendments thereto, and all understandings and assurances contained therein, and directing and authorizing the person identified as the official representative of the grantee to act in connection with the submission of the One-Year Action Plan, and to provide such additional information as may be required.
- C. It is following a detailed Citizen Participation Plan which:
 1. Provides for and encourages citizen participation with particular emphasis on participation by persons of low- and moderate-income who are residents of slum and blighted areas and of areas in which funds are proposed to be used, and provides for participation of residents in low- and moderate-income neighborhoods as defined by the local jurisdiction;
 2. Provides citizens with reasonable and timely access to local meetings, information, and records relating to the grantee's proposed use of funds, as required by the regulations of the Secretary, and relating to the actual use of funds under the Act;
 3. Provides for technical assistance to representative groups of persons of low- and moderate-income that request such assistance in developing proposals with the level and type of assistance to be determined by the grantee;

4. Provides for public hearings to obtain citizen views and to respond to proposals and questions at all stages of the community development program, including at least the development of needs, the review of proposed activities, and review of program performance, which hearings shall be held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodation for the handicapped;
5. Provides for a timely written answer to written complaints and grievances, within 15 working days where practicable; and,
6. Identifies how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate.

Prior to submission of its Housing and Community Development Plan to HUD, the grantee has:

1. Met the citizen participation requirements of 24 CFR 91.105.
 2. Prepared its One-Year Action Plan in accordance with 24 CFR 91 and made the Plan available to the public.
- D. The grants will be conducted and administered in compliance with:
1. Title VI of the Civil Rights Act of 1964 (Public Law 88-352, 42 USC 2000d *et seq.*); and,
 2. The Fair Housing Act (42 USC 3601-20).
- E. It will affirmatively further fair housing.
- F. It has developed its Plan to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight, except that the aggregate use of CDBG funds received under Section 106 of the Act, and, if applicable, under Section 108 of the Act, during the 2010-2011 program year shall principally benefit persons of low- and moderate-income in the manner that ensures not less than 70 percent of such funds are used for activities that benefit such persons during such period.
- G. It has developed a community development plan for the period specified in Paragraph F above that identifies community development and fair housing needs and specifies both short- and long-term community development objectives that have been developed in accordance with the primary objective and requirements of the Act.
- H. It will not attempt to recover any capital costs of public improvements assisted in whole or in part with funds provided under Section 106 of the Housing and Community Development Act of 1974, as amended, or with amounts resulting from a guarantee under Section 108 of the Act by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:
1. Funds received under Section 106 of the Housing and Community Development Act of 1974, as amended, are used to pay the proportion of such fee or assessment that related to the capital costs of such public improvements that are financed from revenue sources other than under Title 1 of the Act; or,

2. For purposes of assessing any amount against properties owned and occupied by persons of moderate-income, the grantee certifies to the Secretary that it lacks sufficient funds received under Section 106 of the Housing and Community Development Act of 1974, as amended, to comply with the requirements of subparagraph H(1) above.
- I. Its notification, inspection, testing, and abatement procedures concerning lead-based paint will comply with 24 CFR 570.608.
 - J. It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, as required under 24 CFR 570.606(a) and federal implementing regulations, it is following a residential anti-displacement and relocation assistance plan as required under Section 104(d) of the Act and in 24 CFR 570.606(c), and it will comply with the relocation requirements of 24 CFR 570.606(d) governing optional relocation assistance under Section 105(a)(11) of the Act.
 - K. It has adopted and is enforcing:
 1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and,
 2. A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.
 - L. To the best of its knowledge and belief:
 1. No federal appropriated funds have been paid, or will be paid, by or on behalf of it to any person for influencing or attempting to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with the awarding of any federal contract, the making of any federal grant, the making of any federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement;
 2. If any funds other than federal appropriated funds have been paid, or will be paid, to any person for influencing or attempting to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee or a member of Congress in connection with this federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and,
 3. It will require that the language of Paragraph L of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.
 - M. It will provide a drug-free workplace by:
 1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition.

2. Establishing an ongoing drug-free awareness program to inform employees about:
 - a) The dangers of drug abuse in the workplace;
 - b) The grantee's policy of maintaining a drug-free workplace;
 - c) Any available drug counseling, rehabilitation, and employee assistance programs; and,
 - d) The penalties that may be imposed upon employees for drug abuse violation occurring in the workplace.
 3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by Paragraph M(1)
 4. Notifying the employee in the statement required by Paragraph M(1) that, as a condition of employment under the grant, the employee will:
 - a) Abide by the terms of the statement; and,
 - b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction.
 5. Notifying the agency in writing within ten calendar days after receiving notice under Paragraph M(4)(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant.
 6. Taking one of the following actions, within 30 calendar days of receiving notice under Paragraph M(5), with respect to any employee who is so convicted:
 - a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or,
 - b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a federal, state, or local health, law enforcement, or other appropriate agency.
 7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of Paragraphs 1 through 6.
- N. If it is subsequently determined that additional sites will be used for the performance of work under the grant, it shall notify HUD immediately upon the decision to use such additional sites by submitting a revised "Place of Performance" form.
- O. It will comply with the other provisions of the Act and with other applicable law.
- P. Before committing to any HOME funds, the City will evaluate HOME Projects that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.
- Q. If the participating jurisdiction intends to provide tenant-based rental assistance, the use of HOME funds for tenant-based rental assistance is an essential element of the participating

jurisdiction's annual approved housing strategy for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

* * * *

STATE OF MICHIGAN }
County of Jackson } ss
City of Jackson }

I, Lynn Fessel, City Clerk in and for the City of Jackson, County and State aforesaid, do hereby certify that the foregoing is a true and complete copy of a resolution adopted by the Jackson City Council on the 11th of May, 2010.

IN WITNESS WHEREOF, I have hereto affixed my signature and the Seal of the City of Jackson, Michigan, on the 12th day of May, 2010.

Lynn Fessel

City Clerk

S:\CDBG-HOME\Action Plans\FY10-11\Resolution.doc

Appendix C

Certifications



CPMP Non-State Grantee Certifications

Many elements of this document may be completed electronically, however a signature must be manually applied and the document must be submitted in paper form to the Field Office.

- This certification does not apply.
- This certification is applicable.

NON-STATE GOVERNMENT CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug Free Workplace -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about –
 - a. The dangers of drug abuse in the workplace;
 - b. The grantee's policy of maintaining a drug-free workplace;
 - c. Any available drug counseling, rehabilitation, and employee assistance programs; and
 - d. The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will –
 - a. Abide by the terms of the statement; and
 - b. Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted –
 - a. Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - b. Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

8. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
9. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
10. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

May , 2010

Signature/Authorized Official

Date

Karen F. Dunigan

Name

Mayor

Title

161 W. Michigan Avenue

Address

Jackson, MI 49201

City/State/Zip

517-788-4028

Telephone Number

- This certification does not apply.
 This certification is applicable.

Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

11. Maximum Feasible Priority - With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
12. Overall Benefit - The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2010, 2____, 2____, (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
13. Special Assessments - It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

14. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
15. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of part 35, subparts A, B, J, K and R, of title 24;

Compliance with Laws -- It will comply with applicable laws.

<hr/>	May , 2010
Signature/Authorized Official	Date
Karen F. Dunigan	
Name	
Mayor	
Title	
161 W. Michigan Avenue	
Address	
Jackson, MI 49201	
City/State/Zip	
517-788-4028	
Telephone Number	

- This certification does not apply.**
 This certification is applicable.

**OPTIONAL CERTIFICATION
CDBG**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities, which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Signature/Authorized Official

Date

Name

Title

Address

City/State/Zip

Telephone Number

- This certification does not apply.
 This certification is applicable.

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

Appropriate Financial Assistance -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Signature/Authorized Official Date

Karen F. Dunigan

Name

Mayor

Title

161 W, Michigan Avenue

Address

Jackson, MI 49201

City/State/Zip

517-788-4028

Telephone Number

May , 2010

- This certification does not apply.
 This certification is applicable.

HOPWA Certifications

The HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Signature/Authorized Official

Date

Name

Title

Address

City/State/Zip

Telephone Number

- This certification does not apply.
 This certification is applicable.

ESG Certifications

I, _____, Chief Executive Officer of **Error! Not a valid link.**, certify that the local government will ensure the provision of the matching supplemental funds required by the regulation at 24 *CFR* 576.51. I have attached to this certification a description of the sources and amounts of such supplemental funds.

I further certify that the local government will comply with:

1. The requirements of 24 *CFR* 576.53 concerning the continued use of buildings for which Emergency Shelter Grants are used for rehabilitation or conversion of buildings for use as emergency shelters for the homeless; or when funds are used solely for operating costs or essential services.
2. The building standards requirement of 24 *CFR* 576.55.
3. The requirements of 24 *CFR* 576.56, concerning assurances on services and other assistance to the homeless.
4. The requirements of 24 *CFR* 576.57, other appropriate provisions of 24 *CFR* Part 576, and other applicable federal laws concerning nondiscrimination and equal opportunity.
5. The requirements of 24 *CFR* 576.59(b) concerning the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.
6. The requirement of 24 *CFR* 576.59 concerning minimizing the displacement of persons as a result of a project assisted with these funds.
7. The requirements of 24 *CFR* Part 24 concerning the Drug Free Workplace Act of 1988.
8. The requirements of 24 *CFR* 576.56(a) and 576.65(b) that grantees develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted with ESG funds and that the address or location of any family violence shelter project will not be made public, except with written authorization of the person or persons responsible for the operation of such shelter.
9. The requirement that recipients involve themselves, to the maximum extent practicable and where appropriate, homeless individuals and families in policymaking, renovating, maintaining, and operating facilities assisted under the ESG program, and in providing services for occupants of these facilities as provided by 24 *CFR* 76.56.
10. The requirements of 24 *CFR* 576.57(e) dealing with the provisions of, and regulations and procedures applicable with respect to the environmental review responsibilities under the National Environmental Policy Act of 1969 and related

authorities as specified in 24 *CFR* Part 58.

11. The requirements of 24 *CFR* 576.21(a)(4) providing that the funding of homeless prevention activities for families that have received eviction notices or notices of termination of utility services will meet the requirements that: (A) the inability of the family to make the required payments must be the result of a sudden reduction in income; (B) the assistance must be necessary to avoid eviction of the family or termination of the services to the family; (C) there must be a reasonable prospect that the family will be able to resume payments within a reasonable period of time; and (D) the assistance must not supplant funding for preexisting homeless prevention activities from any other source.
12. The new requirement of the McKinney-Vento Act (42 *USC* 11362) to develop and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons. I further understand that state and local governments are primarily responsible for the care of these individuals, and that ESG funds are not to be used to assist such persons in place of state and local resources.
13. HUD's standards for participation in a local Homeless Management Information System (HMIS) and the collection and reporting of client-level information.

I further certify that the submission of a completed and approved Consolidated Plan with its certifications, which act as the application for an Emergency Shelter Grant, is authorized under state and/or local law, and that the local government possesses legal authority to carry out grant activities in accordance with the applicable laws and regulations of the U. S. Department of Housing and Urban Development.

Signature/Authorized Official	Date
Name	
Title	
Address	
City/State/Zip	
Telephone Number	

- This certification does not apply.
 This certification is applicable.

APPENDIX TO CERTIFICATIONS

Instructions Concerning Lobbying and Drug-Free Workplace Requirements

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).
6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant: Place of Performance (Street address, city, county, state, zip code) Check if there are workplaces on file that are not identified here. The certification with regard to the drug-free workplace is required by 24 CFR part 21.

Place Name	Street	City	County	State	Zip
City of Jackson	161 W. Michigan	Jackson	Jackson	MI	49201
John George Home	1501 E. Ganson	Jackson	Jackson	MI	49202

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules: "Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15); "Conviction" means a finding of guilt (including a plea of *nolo contendere*) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes; "Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any

controlled substance; "Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including:

- a. All "direct charge" employees;
- b. all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and
- c. temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Note that by signing these certifications, certain documents must be completed, in use, and on file for verification. These documents include:

- 1. Analysis of Impediments to Fair Housing
- 2. Citizen Participation Plan
- 3. Anti-displacement and Relocation Plan

	May , 2010
Signature/Authorized Official	Date
Karen F. Dunigan	
Name	
Mayor	
Title	
161 W. Michigan Avenue	
Address	
Jackson, MI 49201	
City/State/Zip	
517-788-4028	
Telephone Number	