



Stabilizing City Neighborhoods 2012-2013 Action Plan



Community Development Block Grant



Demolition

HOME Investment Partnerships Program



Rehabilitation



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 ICPMP.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: City of Jackson		UOG Code:	MI263174 JACKSON
Address: 161 W. Michigan Avenue		DUNS:	085031656
		Organizational Unit: Administration	
City: Jackson	State: Michigan	Department: Community Development	
ZIP: 49201	Country: U.S.A.	Division: Community Development Dept.	
Employer Identification Number (EIN):		County: Jackson	
38-6004701		Program Year Start Date: 07/01/12	
Applicant Type:		Specify Other Type if necessary:	
Local Government: City		Specify Other Type	
Program Funding		U.S. Department of Housing and Urban Development	
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 \$1,147,952	Additional HUD Grant(s) Leveraged	Describe	
Additional Federal Funds Leveraged		Additional State Funds Leveraged	
Locally Leveraged Funds		Grantee Funds Leveraged	
Anticipated Program Income \$ 75,000		Other (Describe)	
Total Funds Leveraged for CDBG-based Project(s) \$1,222,952			
Home Investment Partnerships Program		14.239 HOME	
HOME Project Titles Housing		Description of Areas Affected by HOME Project(s) Citywide	
HOME Grant Amount \$262,391	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) \$262,391			
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 MI-007	Project Districts MI-007		
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
		<input checked="" type="checkbox"/> No	Program is not covered by EO 12372
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A	Program has not been selected by the state for review

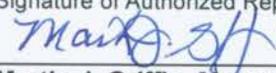
Person to be contacted regarding this application			
First Name Michelle	Middle Initial L.	Last Name Pultz-Orthaus	
Title Records Mgmt Coordinator	Phone (517) 768-6436	Fax (517) 780-4781	
E-mail mpultz@cityofjackson.org	Website www.cityofjackson.org	Director Patrick H. Burtch (517) 768-6438	
Signature of Authorized Representative  Martin J. Griffin, Mayor		Date Signed May 10, 2012	

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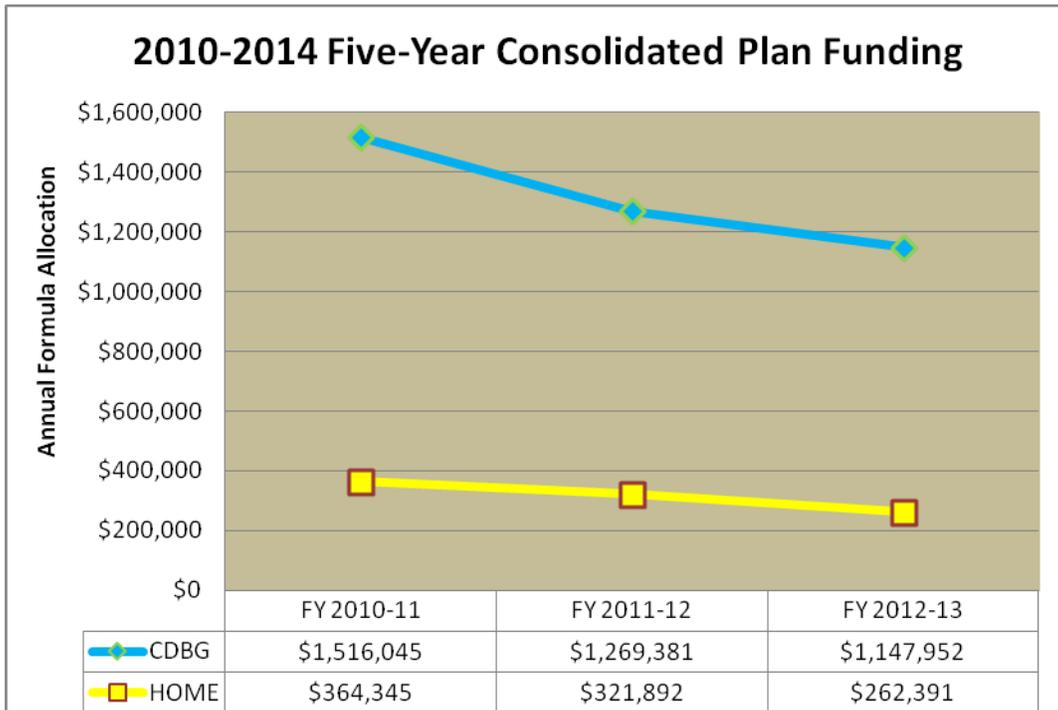
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Appendix A	Citizen Comments
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Executive Summary

The City of Jackson presents this One-Year Action Plan as the third year of its 2010-2014 Five-Year Consolidated Plan and covers the period of July 1, 2012 through June 30, 2013, also referred to as Program Year (PY) 2012 or Fiscal Year (FY) 2012. PY 2012 represents the City's 38th consecutive year to receive a Community Development Block Grant (CDBG) formula allocation as an entitlement community and 21st year to receive a HOME Investment Partnerships Program (HOME) formula allocation as a participating jurisdiction.

Since the beginning of the 2010-2014 Five Year Consolidated Plan, the City has received consecutively lower grant amounts to invest in the community:



As demonstrated above, CDBG funds declined more than 24% and HOME funds dropped 28% in two funding cycles, significantly diminishing the City's ability to improve neighborhood housing and living conditions.

Since 2009, City Council has worked to overcome several obstacles relating to the leadership and the local economy:

Resignation of the City Manager – from October 2009 until June 2011, the City was without a permanent leader, but progressed under the tutelage of two Interim City Managers. On June 1, 2011, the current City Manager, Laurence Shaffer, assumed leadership of the City.

Election of a new mayor – Karen Dunigan took office in December 2009 with little prior political experience and required significant training to become more knowledgeable about various ordinances, rules, and regulations. Ms. Dunigan

was defeated in November 2011 and Mayor Martin J. Griffin was installed in December 2011. Mayor Griffin has significant political experience, having previously served as Jackson's Mayor from 1995 to 2006, and also as a Michigan State Representative for four years.

General Fund concerns – like many Michigan communities, the focus of City leaders was to stabilize the City's General Fund. Several factors, such as reduced state revenue sharing, and income and property taxes, resulted in near bankruptcy conditions. During the tenure of the second interim City Manager, drastic measures were taken to balance the General Fund, including employee layoffs.

Comprehensive Plan – in 2010, the City adopted an updated Comprehensive Plan prepared by Region II Planning Commission; however, the Plan merely updated the 2003 Comprehensive Plan for the City of Jackson. Current administration has discussed the need for a complete overhaul of the City's Comprehensive Plan to provide more visioning for economic stabilization and focus on the factors which will provide the City with positive outcomes.

Community Development Director – in November 2010, the Community Development Director was terminated. City Council immediately began a search to fill the position as well as the City Manager position.

In May 2011, Patrick H. Burtch was hired as the Deputy City Manager/Community Development Director. Mr. Burtch's previous employment was the Village Manager of Dundee, Michigan for more than a period of 22 years. Dundee accomplished significant economic growth, including the opening of over 15 manufacturing plants exceeding a total investment of \$100 million, the opening of Cabela's 275,000 square foot retail showroom in 2000, and the \$1.5 billion Global Engine Manufacturing Alliance (GEMA) plant, jointly managed by Chrysler Group, Hyundai Motor Company and Mitsubishi Motors Corporation, in 2005. Together, Cabela's and GEMA employ hundreds of people in southeastern Michigan and northern Ohio. The development and opening of Cabela's and GEMA provided the impetus for additional growth in Dundee, including hotels, restaurants, and major infrastructure improvements, and enriched formerly impoverished neighborhoods, unseen in most other Michigan communities during the same time period.

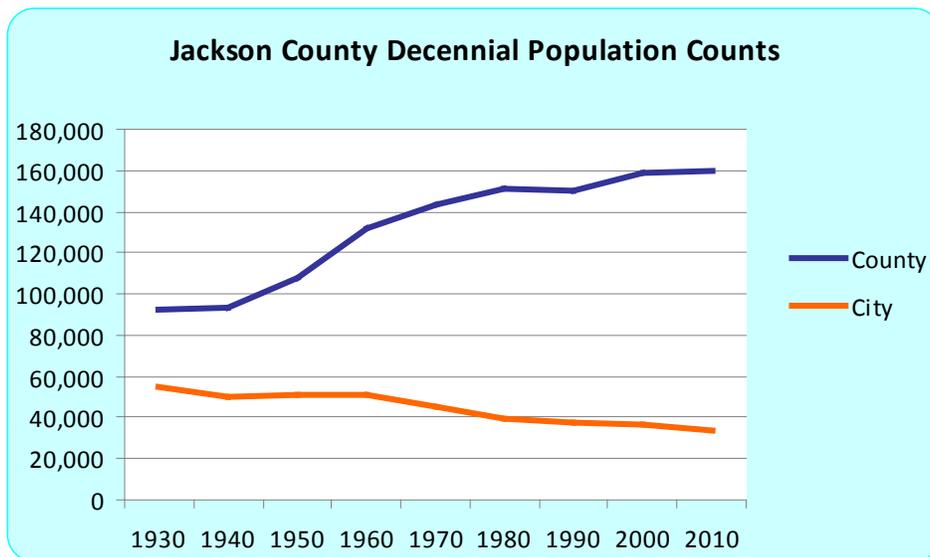
City Council also hired a permanent City Manager, Laurence Shaffer, who began his tenure in June 2011. Since 1996, Mr. Shaffer has served as a Town Administrator or Manager in Amherst, MA, Vernon, CT, and Durham, NH, bringing with him significant grant experience with HUD EDI, EPA Brownfield Assessment and Cleanup, Rural Development Agency, Small Cities Program, HUD 312, and UDAG. Some of Mr. Shaffer's past accomplishments include a \$15 million sewer project, \$90 million public improvement bonds, and administering TIF financing for a 500 acre corporate park.

In the short time they have been with the City of Jackson, Mr. Shaffer and Mr. Burtch have been able to facilitate a rise in employee morale, bring various departments together to work more cohesively, and have spearheaded a new initiative to improve the overall economy in Jackson. The preliminary phases of the overall Economic Stabilization Program will concentrate on neighborhood stabilization, which includes, but is not limited to, the overall reduction of vacant, non-owner occupied structures and units, redirect the City's garbage and blight

enforcement efforts, utilize a much more targeted effort for rehabilitation of single family homes, and initiate a specific asset management plan that reflects the reality of Jackson’s overall housing conditions. CDBG and HOME funds will provide the initial and sustained momentum for revitalization.

General Demographic 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, M-60 and M-106. 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. An historical review of Jackson County’s population concentrations and trends confirm the migration of people from the urban core of the City into the surrounding suburban and rural townships, especially since the 1960 Census. In 1930, 60% of Jackson County’s population lived within the 11 square mile confines of the City of Jackson; 80 years later, only 21% of the total county population lives in the City. During the past 50 years, Jackson County’s population grew by 17.6% while the City lost 33.9% of its residents.



As illustrated in the table below, Jackson’s population has also grown more diverse over 20 years. While the racial makeup of the City remains mostly White and Black or African American residents, the number of White residents has decreased while the number of Black or African American inhabitants has increased, as has the number of persons claiming heritage from two or more races or with a Hispanic or Latino background.

Race	1990 Census	2000 Census	2010 Census
White	80.2%	73.9%	71.4%
Black or African American	17.7%	19.7%	20.4%
Two or More Races	n/a	3.7%	5.5%
Ethnicity			
Hispanic/Latino	2.5%	4.0%	5.3%

Lack of employment remains a big concern for Jackson residents. While the annual jobless rate in the City has shown consecutive improvement since 2009, it continues to be significantly higher than Jackson County, the state of Michigan, and the United States.

	Annual Jobless Rates			
	2008	2009	2010	2011
United States	5.8%	9.3%	9.6%	8.9%
State of Michigan	8.3%	13.3%	12.5%	10.4%
Jackson County	8.4%	13.1%	12.6%	9.9%
City of Jackson	12.1%	18.6%	17.9%	14.3%

Economic recovery cannot necessarily be assumed because unemployment percentages have fallen across the board for two consecutive years. The Bureau of Labor Statistics (BLS) defines unemployment as people who “do not have a job, have actively looked for work in the prior four weeks, and are currently available for work.” Most people leave the labor force when they retire, go to school, have a disability that keeps them from working, or have family responsibilities. Others may feel they can’t get work so stop looking and are then classified as discouraged workers and the BLS removes them from both the unemployment statistics and labor force. Further, September 6, 2011, Governor Snyder signed into law a stricter, four-year limit on cash welfare benefits. From October 1, 2011 to February 29, 2012, 90 individuals in Jackson County have lost their cash assistance due to the 48 month lifetime limit.

Correlative to the joblessness plaguing Jackson’s workforce is the increasing number of persons living below the poverty level. The 2008-2010 American Community Survey Table S1701: Poverty Status in the Past 12 Months estimates 31.9% of the City’s population lives below the poverty level, 2.9 percentage points more than the estimate contained in the 2006-2010 American Community Survey. The Overall Low/Mod Income Summary Data (LMISD) issued by HUD for 2011 reveals the entire City of Jackson consists of 55.6% low- and moderate-income individuals and families. Considering this data has not changed since the Overall LMISD published for 2009, it is conceivable the percentage of low- and moderate-income individuals and families has increased.

In the time span between the 2000 Census and the 2010 Census, the City had 1.4% more total housing units reported, but occupied housing units fell by 6.5% while the number of vacant or abandoned units more than doubled.

	2000 Census		2010 Census	
	Number	Percent	Number	Percent
Total Housing Units	15,241	100.0%	15,457	100.0%
Occupied Housing Units	14,210	93.2%	13,294	86.0%
Owner Occupied	8,181	57.6%	7,004	52.7%
Renter Occupied	6,029	42.4%	6,290	47.3%
Vacant Housing Units	1,031	6.8%	2,163	14.0%

The total number of housing units has shown less than a 2% fluctuation over the past 40 years while population has fallen nearly 40% during the same time. The oversupply of housing within the City caused housing values to drop and allowed for real estate investors to purchase single

family homes and convert them to rental units, many times dividing a home into two or more housing units.

Grant Administration

Grant Programs

The City of Jackson's annual formula allocations received from the U.S. Department of Housing and Urban Development (HUD) for Program Year 2012 are as follows:

Community Development Block Grant		\$1,222,952
2012 Entitlement	\$1,147,952	
Program Income (estimated)	75,000	
HOME Investment Partnerships Program		\$262,391
2012 Entitlement	\$262,391	

Program Purpose and Objectives

The Community Development Block Grant (CDBG) program is authorized under Title I of the Housing and Community Development Act of 1974, as amended, which has a primary objective of developing viable urban communities. These viable communities are achieved by providing the following, principally for persons of low- and moderate-income:

- ❖ Decent housing;
- ❖ A suitable living environment; and,
- ❖ Expanded economic opportunities.

The HOME program was created by the National Affordable Housing Act of 1990, as amended. The intent of the HOME program is to provide decent affordable housing to lower-income households, expand the capacity of non-profit housing providers, strengthen the ability of state and local governments to provide housing, and leverage private-sector participation.

Match Requirements

All participating jurisdictions must contribute 25% of every dollar in HOME funds as a means to mobilize community resources in support of affordable housing. The HOME statute provides for a reduction of the matching contribution requirement under three conditions: fiscal distress, severe fiscal distress, and for Presidentially-declared major disasters covered under the Stafford Act. The City of Jackson continues to receive a 100% exemption from HOME match requirements due to fiscal/severe fiscal distress; the CDBG program has no match requirements.

Income Limits

Both the CDBG and HOME grants require certain thresholds be met to provide assistance to the City's lower income community. Local income limits are published annually by HUD based on estimates of median family income with adjustments based on family size. The following table provides the current income guidelines for Jackson, effective December 1, 2011:

2012 Area Median Income (AMI) Limits

% of Median	Limit per Number of Persons in Household							
	1	2	3	4	5	6	7	8
30%	\$12,950	\$14,800	\$16,650	\$18,500	\$20,000	\$21,500	\$22,950	\$24,450
50%	\$21,600	\$24,650	\$27,750	\$30,800	\$33,300	\$35,750	\$38,200	\$40,700
60%	\$25,920	\$29,580	\$33,300	\$36,960	\$39,960	\$42,900	\$45,840	\$48,840
80%	\$34,550	\$39,450	\$44,400	\$49,300	\$53,250	\$57,200	\$61,150	\$65,100
100%	\$43,200	\$49,300	\$55,500	\$61,600	\$66,600	\$71,500	\$76,400	\$81,400

References to income levels are as follows:

Extremely low-income	Individuals/families earning 30% AMI or less
Low-income	Individuals/families earning 31% to 50% AMI
Moderate-income	Individuals/families earning 51% to 80%

At least 70% of CDBG activities must provide a benefit to low- and moderate-income beneficiaries (80% of AMI). Since 2006, the City has funded programs and projects that reported outcomes benefitting no less than 90% low- and moderate-income clientele. A low/mod area is a defined, primarily residential area where at least 51% of the residents are low- and moderate-income persons. HOME requires 100% of funds made available to homeownership activities be invested in dwelling units occupied by households that qualify as low-income families, and not less than 90% of families receiving rental assistance have annual incomes that do not exceed 60% AMI.

Section 8 / McKinney-Vento Homeless Assistance

The City of Jackson does not receive a direct allocation of either Section 8 or McKinney-Vento Homeless Assistance funds. The Jackson Housing Commission administers Section 8 and other funds available to public housing authorities, such as capital improvement funds. For calendar year 2011, JHC received \$2,413,236 in Section 8 funding to pay landlords and utility allowances.

The McKinney-Vento Homeless Assistance Act ensures educational rights and protections for children and youth experiencing homelessness. The Jackson County Intermediate School District received \$74,577 in McKinney-Vento funds for the 2011-2012 school year, which is distributed among 14 school districts in the county. A large portion of the funds are used for transportation; however, schools also purchase items such as school supplies, food, and eyeglasses.

Managing the Process

The City of Jackson, through its Community Development Department, acts as lead agency for CDBG and HOME funding and administers the programs covered by the Consolidated Plan and this Action Plan. The Community Development Department is also charged with carrying out several of the funded activities. Various other City departments will conduct the balance of programs and projects under written agreements.

Plan development steps included:

- ✓ Research and analysis of 2000 and 2010 Census data, 2006-2010 and 2008-2010 American Community Survey estimated data, and various other reports as noted throughout the Plan;
- ✓ Consultation with community organizations, non-profit service providers, Public Housing Authority, Jackson County Continuum of Care, and other such entities;
- ✓ Analysis of various other planning documents pertinent to the City to target common objectives;
- ✓ Public hearing to receive citizen input on housing and community development needs;
- ✓ Public comment period;
- ✓ City Council approval of the Action Plan.

Consultation with community organizations included, but was not limited to:

Housing

Community Action Agency
 Jackson Affordable Housing Corporation
 Jackson Housing Commission
 Michigan Prisoner Re-Entry Initiative
 disAbility Connections
 AWARE, Inc.
 Jackson Interfaith Shelter
 Homeless Veterans Program
 Jackson County Land Bank Authority

Social Service Agencies

The Salvation Army
 LifeWays Community Mental Health
 Training & Treatment Innovations
 South Central Michigan Works!
 Jackson County Intermediate School District
 Segue, Inc.
 Department of Human Services
 United Way of Jackson County
 Do'Chas II
 Central Michigan 2-1-1

Input from the organizations listed above was obtained in various ways, from one-on-one discussions or e-mail exchanges with specific providers to roundtable discussions at various community meetings attended by these agencies. The programs and services these agencies provide are integral to offering a full spectrum of assistance to the community in addition to the resources available from the City.

The City, Jackson County Treasurer, and Jackson County Land Bank Authority have initiated steps to manage properties the County receives through tax foreclosure. Together, these entities plan to collaborate on properties within the City limits to determine the best course of action, which may include demolition, rehabilitation, or sale to the public.

The Jackson City Council conducted a public hearing on January 24, 2012 to seek public input on community development and housing needs before writing this Action Plan. Comments received at that public hearing were 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.

Citizen Participation

The City encourages all citizens to participate in not only the CDBG/HOME planning process, but in all processes of the local government. At the beginning of each City Council meeting, citizens are allowed time to address the Mayor, City Manager, Councilmembers and department heads on matters that concern them. Council meetings are held on the second floor of City Hall, which can accommodate persons with disabilities. Meetings are shown live on a local public access television station, JTV, which also replays the meetings at various other times throughout the

week.

A flyer announcing a public hearing on January 24, 2012 was created to specifically solicit citizen input for the planning and allocation phases of the Annual Action Plan development, and was posted at the following locations:

- ✓ City Hall – two on the entrance doors, one in the Community Development Department lobby, and one in Council Chambers during the January 10, 2012 City Council meeting
- ✓ Jackson Housing Commission – two copies posted at each public housing complex – Shahan-Blackstone North Apartments, Chalet Terrace, and Reed Manor.
- ✓ Jackson County Department of Human Services
- ✓ Community Action Agency
- ✓ The Salvation Army

Notice of the public hearing to receive citizen comments on housing and community development needs was also published on January 14, 2012, in the *Jackson Citizen Patriot* (local daily paper) and on January 18, 2012 in *The Jackson Blazer*, a local bi-weekly publication spotlighting community and neighborhood events. A summary of citizen comments is attached as **Appendix A**.

Per HUD regulation, a draft Action Plan was released for a 30-day public comment period beginning March 20, 2012. A notice of availability was published in the *Jackson Citizen Patriot* on March 18, 2012 and in *The Jackson Blazer* on March 15, 2012. A printed copy of the Action Plan was made available for review at City Hall in both the Clerk's Office (first floor) and Community Development Department (3rd floor), the Jackson District Library Carnegie Branch, and the three public housing complexes, Reed Manor, Shahan-Blackstone North, and Chalet Terrace. An electronic version of the Action Plan was also made available on the Community Development Department's website.

Institutional Structure

Development of the Action Plan involved a collaborative effort of the public and private sector, non-profit agencies, community members and other similar entities and organizations.

Public Institutions

The City of Jackson's Charter establishes the City to be a council-manager municipality, with all powers of the City being vested in the Council. The City Council is made up of seven persons, six of whom serve a particular ward of the City, and the Mayor. The Mayor is an elected official voted in by a majority of City registered voters and serves for two years. Individual councilmembers are elected by a majority of electors in the particular Ward they represent and serve for four years. The Mayor is the chief executive officer of the City without administrative duties, but serves as the official head of the City for ceremonial services, presiding officer of City Council, appoints all members to boards, commissions, authorities and other agencies (subject to City Council confirmation), possesses emergency powers and authority expressly granted by state law, and signs all ordinances, contracts, resolutions, proclamations, and other City documents required by ordinance. The City Manager is appointed by City Council and is the chief administrative officer, having charge of municipal affairs under the direction of City Council.

The Community Development Department serves many functions for the City, including, but not limited to, administration of HUD grants, blight and housing code enforcement activities, homeowner and emergency hazard rehabilitation, building and trades permitting processes, planning and zoning, and economic development. Grant administration duties include the financial responsibilities associated with grant activity, such as preparing proper documents for rehabilitation loans; devising contracts and agreements with non-profit organizations and interdepartmental agreements with other City departments; monitoring to ensure compliance with federal regulations; and technical assistance to subrecipients when necessary.

The City has successfully transitioned its zoning and planning efforts from an outside agency, Region 2 Planning Commission (R2PC), to an American Institute of Certified Planners (AICP) certified staff member of the Community Development Department. Having immediate access to a zoning and planning administrator is not only more cost effective, but also cuts down on processing time allowing for ventures to begin sooner. In addition to providing guidance on various day-to-day zoning issues and reviewing site plans, the Zoning and Planning Coordinator staffs the City Planning Commission, the Zoning and Sign Boards of Appeal, and the Historic District Commission.

The City is also developing a cooperative partnership with the Jackson County Treasurer and Jackson County Land Bank Authority to work together concerning the best course of action to take with City properties the County receives through tax foreclosure, most of which are dilapidated, vacant structures for which cost to rehabilitate far exceeds finished residual value.

The Jackson Housing Commission (JHC) is the City's Public Housing Authority (PHA), providing housing and other resources to the community's most disadvantaged residents. The JHC manages three separate public housing complexes providing 503 rental units plus 40 scattered site rental homes.

Non-Profit Entities

It is unfortunate that PY 2012 CDBG and HOME funds will be at all time lows and not allow for discretionary public service allocations to non-profit organizations. In the past, the Jackson City Council relied on non-profit entities to provide its low- to moderate-income residents an affordable, sustainable living environment by allocating public service dollars to assist programs directed at this population. However, the City will continue to support the various missions of the community service providers whenever possible. Community Action Agency (CAA) is the recognized leader in the community in its ability to provide a full array of programs and services to low- and moderate-income residents. The City intends to explore and develop its relationship with CAA to support services related to homeownership and other basic needs in the community, especially activities benefitting residents in the most distressed neighborhoods. CAA has proven its ability to target spending, leverage additional resources, and produce desired results and was selected to conduct Community Housing Development Organization (CHDO) activities with the City's HOME funds.

Community Participation

Various City staff members actively participate on many community-based boards and commissions to remain cognizant of the area's needs. Community Development staff, in particular, is involved with:

- ✓ *Jackson County Continuum of Care* - co-chairperson of the Continuum and a contributor to both the Housing and Discharge Planning pillar groups. The Continuum of Care is made up of approximately 30 agencies and support groups focused on issues surrounding homelessness.
- ✓ *Income Community Solutions* – a group convened to assist United Way of Jackson County make good decisions for the community based on current conditions.
- ✓ *Emergency Needs Coalition* – meets monthly to provide updates on current community conditions so emergency needs are met. Difficult matters are discussed openly to achieve practical solutions.
- ✓ *Jackson Area Comprehensive Transportation Study* – forum for transportation decision-making and coordinated approach to transportation improvements, including mass transit to low- and moderate-income individuals and families.

While some agencies participate in each of the groups listed above, individual groups include other service providers and community leaders to gain convergence in their particular focus area. Coordination and collaboration between housing providers, social service agencies, and local government is expected to continue in the coming year.

Monitoring

The Community Development Department monitors the City's performance in meeting goals and objectives set forth in the Five-Year Consolidated Plan. Results are reported in the Consolidated Annual Performance and Evaluation Report (CAPER), which is submitted by September 30 of each year.

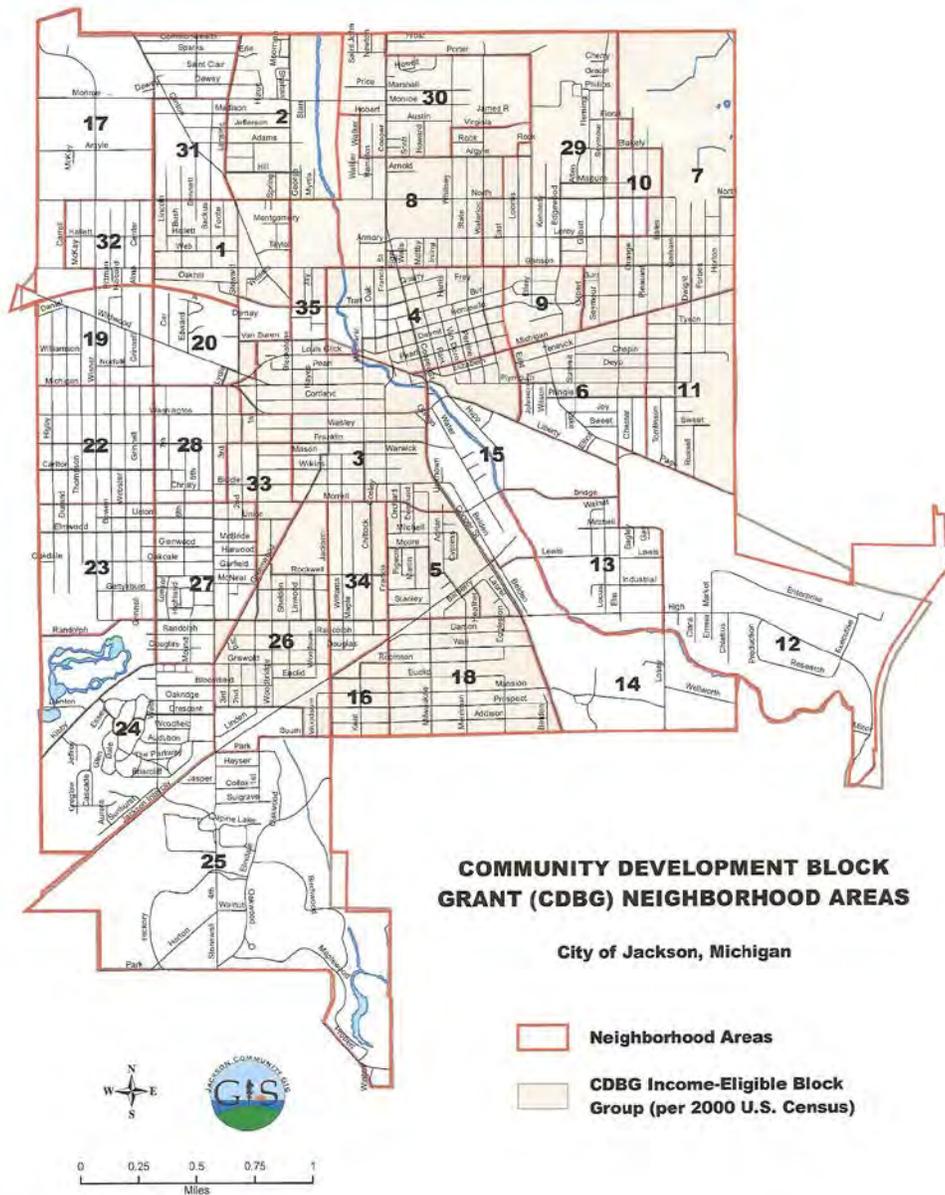
Internal fiscal controls are in place and generate accounting system reports that are regularly reviewed by Community Development staff. These reports identify the dollar amount allocated, the amount obligated and the amount expended. Timeliness of expenditures is monitored regularly to ensure compliance with HUD regulations. Reimbursement requests received from subrecipients are reviewed for eligibility and adequate source documentation. Staff reviews the Grantee Summary Activity Report (PR08) monthly as another measure to meet timeliness issues.

During review of applications through an annual competition for grant funds, a risk analysis is conducted of the potential recipient of grant funds. Based on that risk analysis, prospective organizations are assessed for strengths and weaknesses in order to develop support mechanisms to enhance program delivery. This assessment takes into consideration the nature and eligibility of the activity, whether it is a duplicative service conducted by another agency in a more efficient manner, whether the proposed plan for carrying out the activity is realistic, the organization's capacity to conduct the activity in a timely fashion, and also for the possibility of any conflicts of interest.

During a program year, Community Development staff conducts quarterly desk reviews of performance reports required to be filed by subrecipients of CDBG funds. From those desk reviews, staff is able to determine if a project is on track or when it is expected to begin. Individual agencies may receive one-on-one technical assistance meetings to help explain

different aspects of the program and to aid the agency in accomplishing its goals. Each request for reimbursement is required to supply supporting documentation, which is carefully reviewed by more than one staff person before payments are made.

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

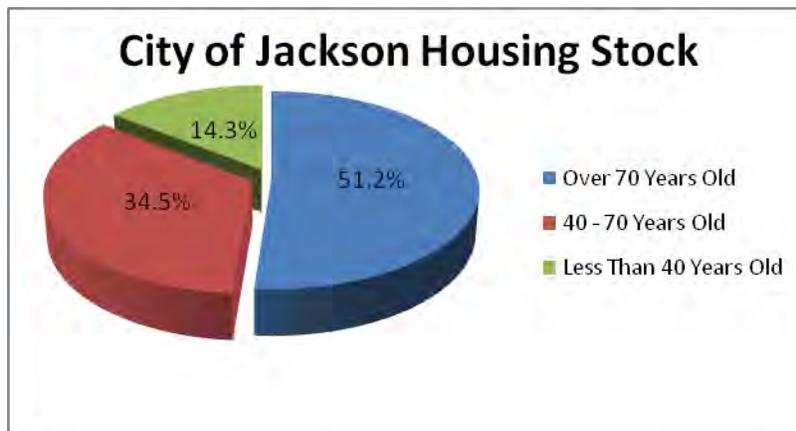


Substantial Amendment to the 2010-2014 Five Year Consolidated Plan

History

Shortly after arriving in Jackson, both the new City Manager, Larry Shaffer, and Deputy City Manager/Community Development Director, Pat Burtch, realized City leaders were trying to manage a downward spiral. The City's population had declined from 55,187 persons (1930 Census) to 33,534 (2010 Census), a loss of nearly 40% of its population, most of which occurred during the past 40 years. For many years Jackson was an industrial and manufacturing community focusing on the automotive industry. When the nation's economy changed in the 1970s and early 1980s, the industrial base eroded as manufacturing plants closed, resulting in thousands of jobs lost and leading to the population decline as workers were forced to move from Jackson to seek stable employment elsewhere.

During the 40 year timeframe between 1970 and 2010, the City's total housing units have only decreased 1.8% from 15,740 units in 1970 to 15,457 units in 2010. Over 85% of the City's housing stock was built before 1970, with over one-half built before 1940.



The overabundance in supply of older housing led to falling sales prices, which encourage real estate investors to purchase and convert large numbers of formerly single-family homes and convert them to two or more rental units. While creating more affordable housing in the short term, the long term impact of the increased supply of rental units caused landlords in the area to decrease their rents in order to attract tenants. As rents decreased, less responsible tenants established residency and oftentimes destroyed what were once suitable living conditions. Blighting conditions began to appear in residential areas and has, over the years, become invasive, strangling once thriving, family-oriented neighborhoods.

The 2008 recession caused a further negative impact on the City's housing stock. In the years preceding the recession, people were buying houses they could not afford as subprime lending allowed homeowners to borrow funds with little money down. When housing prices began to steeply decline in 2006, mortgage holders were faced with owing more money than they could recoup by selling their house, leading many homeowners to walk away and default on their mortgages, resulting in foreclose. The sharp increase in foreclosures, together with a spate of mortgage fraud experienced in the City, reduced population levels, and decreased family size led to a glut of abandoned, vacant homes.

Other conditions leading to a sharp decline in Jackson included:

- Unemployment rates reached a high of over 22% in July 2009 (State of Michigan Labor Market Information – www.michigan.gov/lmi);
- The City is 55.6% low- to moderate-income individuals and families (FY 2011 Overall Low and Moderate Income Summary Data);
- Poverty afflicts 32% of the total population (2008-2010 American Community Survey S1701);
- Housing values are down over 32% since 2007 and projected to reduce an additional eight to ten percent in 2012 (Jackson City Assessor records);
- Over 47% of housing units are non-owner occupied (2010 Census data) and is estimated by the local real estate profession to exceed 52%;
- Significantly increased property tax foreclosures (nearly 600% increase from 2007 to 2011), leading to considerable property tax revenue loss.

In an effort to arrest further decline in housing values and neighborhood vibrancy, Mr. Burtch developed an Overall Economic Stabilization Program. The economic stabilization initiative will be achieved through a multi-phased program, beginning with Jackson Neighborhood Economic Stabilization (JNES). The strategic plans revolve around:

- Employing micro-economic theories of reducing the supply of vacant, abandoned, dilapidated housing through selective demolition, thereby increasing demand, similar to initiatives adopted by many other communities in the state and nationwide;
- Increasing code enforcement, such as rental inspections and blighting violations, implementing a non-owner occupied residential property registry at the end of March 2012 and a foreclosed, vacant and abandoned residential property registry at the end of April 2012.
- Increasing zoning enforcement to curb illegal uses in all zoning districts, especially in the one- and two-family residential districts;
- Exploring viable waste disposal plans, including city-wide garbage and recycling options to replace the current system of individual property owners self-contracting for garbage refuse service and voluntary recycling;
- Supporting homeownership and single family reversions through strategic housing rehabilitation and limited new construction where practical;
- Managing and right-sizing public infrastructure assets.

Supported by the fact that vacant housing units more than doubled between the 2000 and 2010 Census, the initial phase of JNES will concentrate on removing the excess of empty and derelict housing. In salvageable neighborhoods, select rehabilitation of existing housing and possibly limited new construction opportunities will be examined and weighed against the overall benefit such activities will provide to the area in which they are being considered.

Further, the 2010 Census data indicated that Jackson's renter occupied housing (47.3%) increased and owner occupied housing (52.7%) decreased approximately five percentage points in 10 years. However, observations made by City inspectors, real estate agents, and others directly involved with housing estimate renter occupied housing is well over 52%. Efforts will be made to reduce density in renter-occupied housing units through enhanced zoning enforcement and single family reversions through rehabilitation. Increased code enforcement

will also take place to increase the probability neighborhoods will build upon the removal of blighted structures to improve living environments. Cleaner, vibrant neighborhoods may encourage developers to relocate to Jackson, invest in the community, and eventually improve the local economy.

In order to initiate the JNES program, it is necessary to prepare this Substantial Amendment to the 2010-2014 Five-Year Consolidated Plan.

Prioritization of Activities to be Funded

When the Five-Year Consolidated Plan was written, City leaders intended for street paving/reconstruction efforts to receive high priority annual funding, hoping new curbs and streets in a neighborhood would invite new construction or substantial rehabilitation of housing which, in retrospect, may prove less effective than larger overall economic efforts which is already in the market supply and demand of housing. Unfortunately, the number of residential blocks that could be targeted for reconstruction far outweighs the availability of funds and would take many years to complete. The effectiveness of a limited amount of street reconstruction would be similar to untargeted housing rehabilitation – the cost to build and renovate far exceed the potential appraised value of the proposed development and structure. With the onset of the Jackson Overall Economic Stabilization (JOES) program, there may be instances where sections of streets are no longer needed, can be closed, and returned to green space. Managing public infrastructure assets during the next decade, including other public facility/infrastructure improvements, will become critical to revitalizing Jackson. In other words, Jackson needs to implement a “shrinking city strategy” to stabilize local economic conditions.

Other programs receiving a high priority included rehabilitation, code enforcement, and economic development activities. This Substantial Amendment revises priority funding by reducing street improvements, sidewalks, and other infrastructure from a “high” priority rating to a “medium” priority rating. Likewise, the activity “Clearance and Demolition” will be increased from a “medium” priority rating to a “high” priority rating. Funding economic development activities will remain integral to the overall economic stabilization of the City; however, because there are currently no economic development projects funded or under consideration, the priority rating will be revised to “medium” and potential projects will be reviewed on a case-by-case basis.

Below is revised Table 2B Priority Community Development Needs which will remain in effect through June 30, 2015:

Table 2B - Priority Community Development Needs

Priority Need	Priority Need Level	Priority Need	Priority Need Level
Acquisition of Real Property	Medium	Infrastructure <i>(continued)</i>	
Disposition	Medium	Flood Drainage Improvements	Medium
Clearance and Demolition	Medium High	Other Infrastructure	High Medium
Clearance of Contaminated Sites	Medium High	Public Services (General)	Medium
Code Enforcement	High	Senior Services	Medium
Public Facility (General)	Medium	Handicapped Services	Medium
Senior Centers	Medium	Legal Services	Medium
Handicapped Centers	Medium	Youth Services	Medium
Homeless Facilities	Medium	Child Care Services	Medium
Youth Centers	Medium	Transportation Services	Medium

Priority Need	Priority Need Level	Priority Need	Priority Need Level
Neighborhood Facilities	Medium	Substance Abuse Services	Medium
Child Care Centers	Medium	Employment/Training Services	Medium
Health Facilities	Medium	Health Services	Medium
Mental Health Facilities	Medium-High	Lead Hazard Screening	Medium
Parks and/or Recreation Facilities	Medium	Crime Awareness	Medium
Parking Facilities	Medium	Fair Housing Activities	Medium
Tree Planting	Medium	Tenant Landlord Counseling	Medium
Fire Stations/Equipment	Medium	Other Services	Medium
Abused/Neglected Children Facilities	Medium	Economic Development (General)	Medium
Asbestos Removal	Medium	C/I Land Acquisition/Disposition	Medium
Non-Residential Historic Preservation	Medium	C/I Infrastructure Development	Medium
Other Public Facility Needs	Medium	C/I Building Acq/Const/Rehab	Medium
Infrastructure (General)	Medium	Other C/I	Medium
Water/Sewer Improvements	Medium	ED Assistance to For-Profit	Medium
Street Improvements	High-Medium	ED Technical Assistance	Medium
Sidewalks	High-Medium	Micro-enterprise Assistance	High-Medium
Solid Waste Disposal Improvements	Medium	Other (Job Creation)	High-Medium

Geographic Targeting

The City identified a target neighborhood in which to fortify and improve neighborhoods between Cooper Street and Allegiance Health. The City intends to continue to focus efforts in this neighborhood when practicable; however, the JNES demolition program is intended to generate a noticeable effect in neighborhoods throughout the City. All residential areas of the City are affected by the blighting consequences of an overabundance of vacant, abandoned, foreclosed, dilapidated housing. Demolitions are anticipated to occur throughout the City to prevent further deterioration of neighborhoods, but rehabilitation of choice homes deemed salvageable, and very limited new construction of housing where reasonable, will transpire when doing so will add to a neighborhood's appeal. The target neighborhood has potential areas which will greatly benefit from focused rehabilitation and/or new construction, and will be carefully considered along with beneficial green space left after decayed housing is removed. Early visioning of the demolition effects over time will create neighborhoods existing in a more park-like setting.



Potential Funding Sources

Community Development staff have been engaged in an unprecedented data gathering assignment since July 2011, wherein vacant properties are identified and evaluated for estimated rehabilitation versus demolition costs. As of April 18, 2012, 723 vacant residential structures containing 939 housing units have been identified with the following outcomes:

	Total Estimate	Average Cost per Structure
Rehabilitation	\$46,697,249	\$64,588
Demolition	\$8,689,362	\$12,018

This information easily demonstrates the difficulty faced when considering the option of converting substandard housing into decent, safe, and sanitary living quarters. Estimated costs to rehabilitate the 675 structures are over 82% more costly than to remove the blighting conditions. Approximately 95% of the vacant structures identified to date are candidates for demolition and will be carefully scrutinized on a case-by-case basis of which option best suits the neighborhood where it is sited. However, more than a vast majority of the vacant housing evaluated to date have significant structural defects, have been stripped of major internal systems (i.e., copper plumbing, furnaces, copper wiring), and exhibit accelerated deterioration due to environmental infiltration. Additional interior vandalism further renders these housing units excessively cost prohibitive to repair. Taken into consideration collectively, these factors contribute to both the structural and economic obsolescence of each structure.

The costs to demolish so many older residential properties, which likely include asbestos and lead-based paint requiring expensive mitigation measures, are reaching the point of being cost-prohibitive. If the City were to rely solely on its annual CDBG funding, there may be \$200,000 to \$400,000 per year available for demolition. Using the average demolition cost of \$12,018, the City would only have enough funds to remove 16 to 34 structures annually. If all 723 dwellings were eligible for demolition, it would take 21 to 43 years to complete the project, assuming the City is able to maintain the status quo and no further deterioration would occur. An even worse scenario to consider is how many years it would take to renovate these structures into suitable living quarters.

It is not practical to make a community-altering impact solely utilizing annual entitlement funds. To achieve a significant change to City neighborhoods, leaders project it will take 200 demolitions per year over a five-year period. Funding for this multi-year demolition concept alone will still require more than \$2 million per year to accomplish goals and objectives. Various forms of financing are being considered, including:

- ✓ Section 108 Loan secured with current and future CDBG funds;
- ✓ Federal Neighborhood Stabilization Program (NSP) funding, if the program is continued;
- ✓ Brownfield revolving loan funds from the Jackson Brownfield Redevelopment Authority;
- ✓ Limited-Tax General Obligation (LTGO) or General Obligation (GO) Bonds issued by the City;
- ✓ Investment from public or private property holders
- ✓ General funds, as available.

In anticipation of securing multiple sources of funding, Community Development staff has begun contacting certain property holders such as banks, REO holding companies, and HUD. The City is also developing a cooperative partnership with the Jackson County Treasurer and Jackson County Land Bank Authority to manage properties the County receives through tax foreclosure.

Housing

Specific Housing Objectives

City leaders have stepped back and examined how CDBG and HOME funds have been utilized and their effectiveness in creating vital, stable neighborhoods. Little cohesive effect is recognized and, with dwindling grant allocations received from HUD, it is more important than ever that the money invested in the community provides a significant impact. Considering the average cost to rehabilitate the vacant residential properties evaluated by City inspectors to date, it is easily concluded the City and its CHDO, CAA, must re-evaluate their selection processes for homebuyer rehabilitation. Some neighborhoods have deteriorated so extensively, investing any amount of federal funds towards rehabilitation would be considered wasteful. Currently, the City offers the following rehabilitation loans:

Emergency Hazard (CDBG only) – low- to moderate-income homeowners may apply for 20 year deferred loans up to \$10,000 at zero percent (0%) interest to expeditiously correct hazardous conditions, such as a leaking roof during the rainy season, a furnace in the winter, a water heater, sewer backups, etc. The City anticipates issuing 40 emergency hazard loans to alleviate dangerous conditions during Program Year 2012.

Homeowner Rehabilitation (HOME) –homeowner rehabilitation will be accomplished with HOME funds as CDBG funds dwindle and will be utilized for neighborhood projects other than rehabilitation. Currently the City offers \$20,000 loans to correct housing code violations to low- and moderate-income homeowners at zero percent (0%) interest and deferred for 20 years. Loans to correct lead-based paint issues have no maximum and are forgivable over a five (5) year period.

Homebuyer Rehabilitation (HOME) – the tactical acquisition and rehabilitation of vacant homes to be sold to low- to medium-income homebuyers will be the activity of choice during the startup of the JNES portion of the JOES program. Community Development and CAA staffs will have control of strategic considerations, such as level of rehabilitation required, neighborhood stability, and marketability of the unit once rehabilitation is complete. With this method, low- to moderate-income families will not be confined to distressed neighborhoods, but will have options to live in cleaner, safer areas of the City in which to grow a family. Between homeowner and homebuyer rehabilitation, the City and CAA foresee completion of nine (9) single-family housing units in Program Year 2012.

Although no homebuyer assistance project has been specifically identified, it is the intention of the City to consider offering assistance on a case-by-case basis, especially as a component of homebuyer rehabilitation to aid a low- to moderate-income family secure financing. Community Development staff is also exploring the feasibility of instituting a downtown rental rehabilitation program to create housing units in vacant or unused areas above the first floor of downtown buildings.

Annual Affordable Housing Completion Goals
(HUD Table 3B)

Grantee Name: City of Jackson Program Year: 2012-2013	Expected Number of Units To Be Completed	Resources used during the period			
		CDBG	HOME	ESG	HOPWA
BENEFICIARY GOALS (Sec. 215 Only)					
Homeless households	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-homeless households	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Special needs households	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Sec. 215 Beneficiaries*	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
RENTAL GOALS (Sec. 215 Only)					
Acquisition of existing units	0	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Production of new units	0	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Rehabilitation of existing units	0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance	0	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Total Sec. 215 Affordable Rental	0	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HOME OWNER GOALS (Sec. 215 Only)					
Acquisition of existing units	0	<input type="checkbox"/>	<input type="checkbox"/>		
Production of new units	0	<input type="checkbox"/>	<input type="checkbox"/>		
Rehabilitation of existing units	45	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Homebuyer Assistance	0	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Total Sec. 215 Affordable Owner	45	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMBINED RENTAL AND OWNER GOALS (Sec. 215 Only)					
Acquisition of existing units	0	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Production of new units	0	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Rehabilitation of existing units	49	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance	0	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Homebuyer Assistance	0	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Combined Total Sec. 215 Goals*	45	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
OVERALL HOUSING GOALS (Sec. 215 + Other Affordable Housing)					
Annual Rental Housing Goal	0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Annual Owner Housing Goal	45	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Overall Housing Goal	45	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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. The mission of the JHC is:

To assist low income families secure safe, decent and affordable housing; create opportunities for resident and participant families to achieve self sufficiency and

economic independence; and assure fiscal and program integrity by all program participants.

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

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

- No plans to demolish any of its properties. In fact, the JHC plans extensive physical improvements at each location within the next three years. Comments and suggestions from the various Resident Advisory Boards (Shahan-Blackstone, Chalet Terrace, Reed Manor and Section 8) are taken into consideration and, if feasible, implemented.
- A HUD-approved Home Ownership Plan to sell 50 scattered site units to qualifying low- and moderate-income homebuyers. As of June 3, 2008, 10 units had been sold; however, when the housing crisis affected the ability to sell homes, JHC discontinued this program and reconverted these single family homes back into rental units.
- Implemented local preferences to improve the living environment by de-concentration, promoting income mixing, and improving security throughout the developments.
- Created and continues to facilitate self-sufficiency programs to improve resident employability, as well as solicit support services for the elderly and families with disabilities.

The waiting list for Section 8 housing contains less than 200 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. The waiting list for Section 8 housing has been closed for more than two years but may be reopened within the year.

Public Housing has a waiting list of 295 families for 543 units and generally experiences an annual turnover of 127 families. The waiting list remains open and active for public housing units. Due to decreased funding, public housing minimum rent was recently increased from \$25 to \$50 per month.

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 received updates, including new roofs, water heaters, furnaces, windows and doors.

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

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.
- 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:

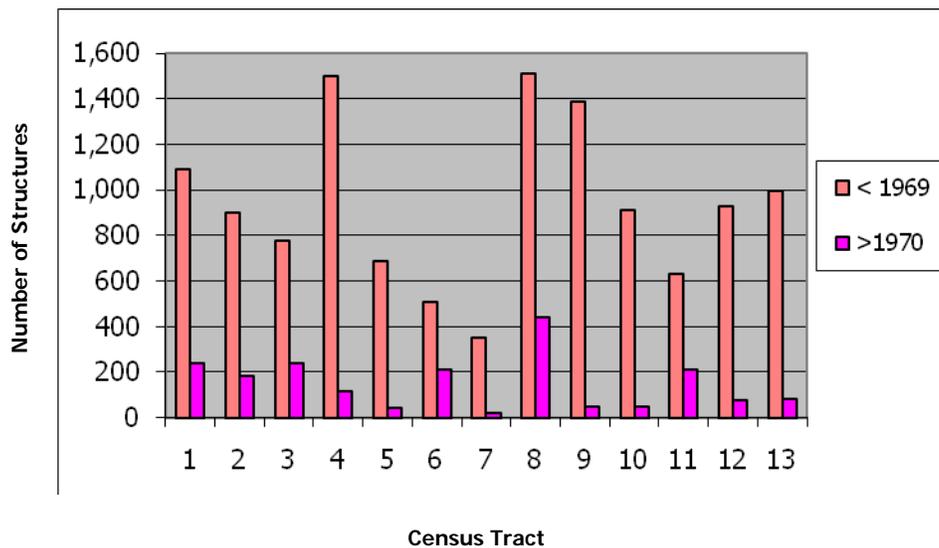
- Lack of jobs available for low- and moderate-income persons in which the potential employee may be able to perform, but is lacking the required experience;
- Unable to afford public transportation or no routes established near work place;
- Unable to afford proper insurance, registration and licensing 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.

The City of Jackson and its CHDO, CAA, will utilize CDBG and HOME funds in the coming year to improve homeowner or homebuyer housing through its emergency hazard and rehabilitation programs. Supporting these programs will ensure necessary repairs are made to alleviate hazardous conditions in a timely fashion and improve energy efficiency when appropriate. The renter population will continue to benefit from the City's rental inspection program and from the newly enacted "Non-Owner Occupied Residential Property Registry" which will require landlords to register rental units and undergo regular inspections to receive compliance certification.

Lead-Based Paint

According to the Michigan Department of Community Health (MDCH), environmental exposure to lead in amounts sufficient to cause illness and neurological damage in children remains a significant concern in Michigan. Jackson County has been identified as one of fourteen counties in Michigan at high risk for childhood lead exposure and poisoning. Lead-based paint hazards are a major concern for the City's young children and pregnant women as over 85% of all housing was constructed prior to 1970, with over 51% being built before 1940. The 2000 Census indicated all Census tracts within the City of Jackson contain aged housing, as demonstrated below:



As Jackson residents continue to struggle with the local economy, property maintenance and repair are not high on the list of priorities. As properties decline, the risk of exposure to lead-based paint hazards increases.

Housing built prior to 1978 (when federal law banned the use of lead-based paint in residential housing) is considered to be at risk of containing some amount of lead-based paint. The amount of lead pigment in the paint increases with the age of the housing. Housing built before 1950 remains a significant concern for lead poisoning as 1950 is often recognized as the "threshold" to lower levels of lead-based paint. Prior to about 1940, paint typically contained high amounts of lead, often 10 to 50 percent. In the early 1950s, paint industry standards voluntarily called for limiting lead content to 1%. With approximately 66% of the housing stock built prior to 1950, Jackson housing units pose a high risk of containing significant lead-based paint hazards. Young children of very low- and low-income households are most likely to reside in older housing, and are disproportionately at risk of lead poisoning. It is anticipated that units of owner occupied housing will continue to decline and the ratio of rental units will increase due

to the stress of the slow and declining economy. Rental properties make up a large percentage of the City's housing units. If units are not maintained, the risk of young children coming into contact with lead-paint hazards continues to climb.

Since HUD's lead-based paint regulations took effect in September 2000, the City has seen rehabilitation costs increase by 60%. Unfortunately, the City's funding sources did not increase at the same time, making it more and more difficult to have a significant impact on the housing in the community. Because of the age of the housing stock, the homes of all applicants for rehabilitation assistance living in homes built prior to 1978 must be tested for lead-based paint. The State of Michigan has enacted legislation to address lead-based paint issues in the state. The City of Jackson and its subgrantees will continue to incorporate and comply with the Michigan Lead Abatement Act to address lead-based paint issues in the community. The City of Jackson and its subgrantees will also comply with the Federal Environmental Protection Agency (EPA)'s Renovation, Remodeling and Paint Law that took effect on April 10, 2010. This law will require contractors performing remodeling and renovation activities in residential properties and child occupied facilities built before 1978 to be certified and to follow specific work practices to prevent lead dust contamination.

From 2006-2010, the City successfully implemented a Lead Hazard Control Program to address lead-based paint hazards in low-income homes built before 1978. The program tested 215 units and provided lead hazard remediation for 174 units. The City will continue to work with referrals from the Jackson County Health Department to identify clients with lead-based paint hazards that may be eligible for a full housing rehabilitation project. These clients will be able to address their lead-based paint hazards and probable code violations in the same project. The downside to this is the amount of funding available per client. Lead hazard remediation may be expensive and may impact the amount of housing projects that can be accomplished through the allocated funding. For families with a child identified as having an elevated blood lead level, the City will refer the family to the Michigan Department of Community Health's Lead and Healthy Homes Program. While the City of Jackson is not identified within the MDCH work plan as a subrecipient community, it does fall under their "statewide" clause of being allowed to provide assistance based on a child with an identified elevated blood lead level. This will provide some opportunity for families with a lead-poisoned child, but it will not aid in the prevention of childhood lead poisoning.

Non-Homeless Special Needs Housing

Certain subpopulations that are not necessarily homeless require special housing or supportive services. Those subpopulations include the elderly, frail elderly, persons with disabilities, persons with alcohol or other drug addiction, victims of domestic violence, and public housing residents.

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 and handicap ramp projects. The City and its subrecipients make every effort during a rehabilitation project to take into account any special needs of the occupants 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. Some disabled tenants have had success in working with landlords to retrofit a housing unit for accessibility; however, oftentimes once that tenant moves out, the retrofitting is also removed making the unit inaccessible for another potential tenant with disabilities. The City will continue efforts to strategically install handicap accessible sidewalk curb ramps in areas of greatest need.

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. The City is taking steps to enhance its zoning enforcement by identifying and documenting vacant and abandoned homes and 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. 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 while decreasing neighborhood density.

Homeless

Specific Homeless Prevention Elements

Since 1994, HUD has been encouraging communities to address the problems of housing and homelessness in a coordinated, comprehensive and strategic fashion. In response, an ad hoc committee of Jackson community agencies formed to address the needs required to maintain and expand affordable housing in Jackson. From that committee, the Jackson County Continuum of Care (CoC) was formed and continues to provide a service to the homeless community in an attempt to strategically end homelessness. The CoC receives both federal and state funding to support and sustain those objectives.

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

- \$10,350 to CAA to serve as Grant Fiduciary.
- \$34,400 to CAA to serve as the Housing Assessment and Resource Agency.
- \$54,232 to CAA to provide utility arrearage financial assistance, short term rental arrearages, and rapid re-housing short term rental assistance.
- \$13,200 to Do'Chas II to provide essential services to youth aging out of foster care.
- \$2,018 to The Salvation Army for essential services case management.
- \$44,938 to AWARE, Inc. for operating expenses related to managing an emergency shelter for survivors of domestic violence and sexual assault and essential services case management.
- \$7,500 to the CoC for subcontracting for Exhibit 1 preparation and Point in Time count services.

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

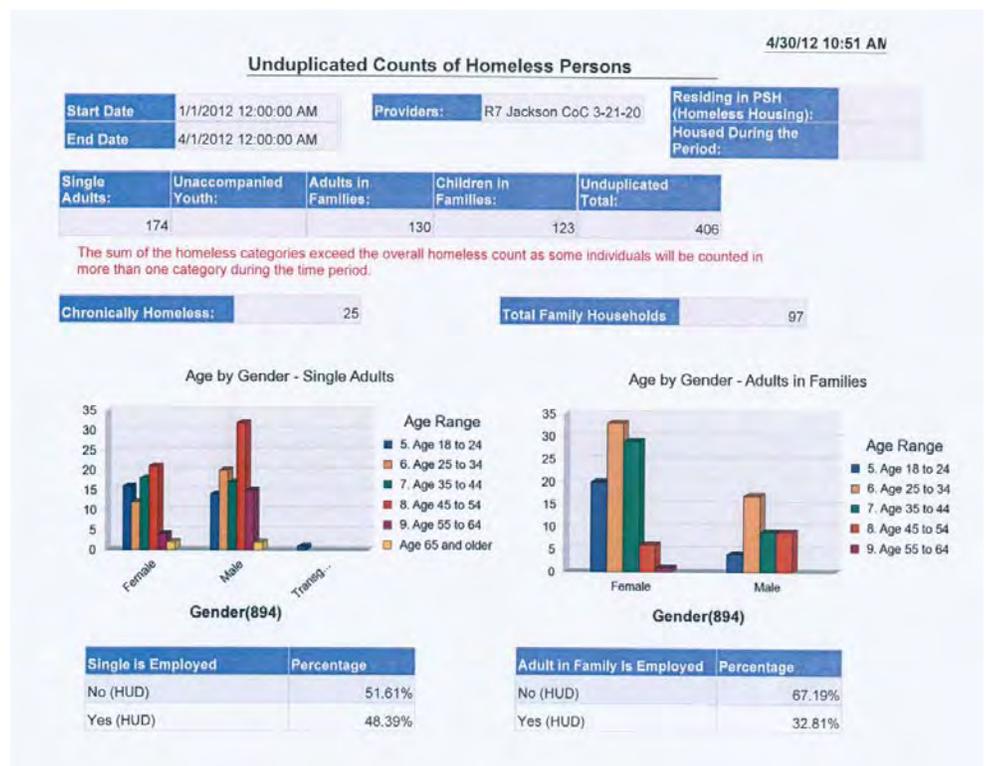
Garfield Square Project	\$190,243
Housing Advocacy Program Expansion	\$269,267
Jackson HMIS	\$ 54,932
Jackson Leasing Assistance Program	\$112,876
Jackson Leasing Assistance Program II	\$118,144
Partnership Park Permanent Housing	\$ 56,131

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

City staff actively participates in the CoC as a co-chairperson and as a contributor to both the Housing and Discharge Planning pillar groups. In 2010, the CoC realized its original strategies and goals for ending homelessness in Jackson were not effective and, in light of the ongoing foreclosure crisis, high unemployment rate, and financial decline, began to rework its strategic plan, action plan and 10 year plan.

Accomplishment goals of the CoC in 2012 include reviving the Strategic Plan, expand education opportunities for local governments, boards and committees, and improve how individuals and families at need access service.

On January 25, 2012, the CoC conducted an annual sheltered Point in Time (PIT) count with the following results:



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

2011 Continuum of Care Housing Inventory Chart

Emergency Shelters

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

Transitional Housing

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

Permanent Supportive Housing

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

Antipoverty Strategy

The 2009 American Community Survey reported 22.9% of all families and 27.2% of all people in the City of Jackson were at or below the federal poverty level. The 2008-2010 American Community Survey (Table S17-01: Poverty Status in the Past Year) provides the following estimated data regarding poverty of families and people whose income in the past 12 months is below the poverty level:

Subject	% Below Poverty
Population for whom poverty status is determined	31.9%
AGE	
Under 18 years	45.1%
Related children under 18 years	44.8%
18 to 64 years	29.7%
65 years and over.....	11.2%
SEX	
Male	28.9%
Female	34.6%

Subject	% Below Poverty
RACE	
White	24.1%
Black or African American	49.2%
Two or more races	59.7%
EDUCATIONAL ATTAINMENT	
Population 25 years and over	24.4%
Less than high school graduate	47.8%
High school graduate (includes equivalency)	23.3%
Some college, associate's degree	20.1%
Bachelor's degree or higher	9.0%
EMPLOYMENT STATUS	
Civilian labor force 16 years and over	18.5%
Employed	10.5%
Male	8.8%
Female	11.9%
Unemployed	52.9%
Male	36.5%
Female	69.5%
WORK EXPERIENCE	
Population 16 years and over	27.5%
Worked full-time, year round in the past 12 months	4.7%
Worked part-time or part-year in the past 12 months	24.3%
Did not work	45.4%
Unrelated individuals for whom poverty status is determined	
Male	39.9%
Female	40.7%
Worked full-time, year round in the past 12 months	39.3%
Worked part-time or part-year in the past 12 months	1.4%
Did not work	42.9%
Did not work	60.5%

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:

Emergency Hazard (CDBG only) – low- to moderate-income homeowners may apply for 20 year deferred loans up to \$10,000 at zero percent (0%) interest to expeditiously correct hazardous conditions, such as a leaking roof during the rainy season, a furnace in the winter, a water heater, sewer backups, etc.

World Changers (CDBG only) – low- to moderate-income homeowners enjoy the annual visits by World Changers and Mission Serve, similar youth ministries utilizing junior and senior high school students and chaperoning adults from

a variety of states converging on Jackson for a week during the summer. While here, the youth provide labor for projects such as roofs, exterior painting and handicap ramps while CDBG funds are used to purchase materials.

Homeowner Rehabilitation (HOME) – most homeowner rehabilitation will be accomplished with HOME funds as CDBG funds dwindle and are available for neighborhood projects other than rehabilitation. Currently the City offers \$20,000 loans to correct housing code violations to low- and moderate-income homeowners at zero percent (0%) interest and deferred for 20 years. Loans to correct lead-based paint issues have no maximum and are forgivable over a five (5) year period.

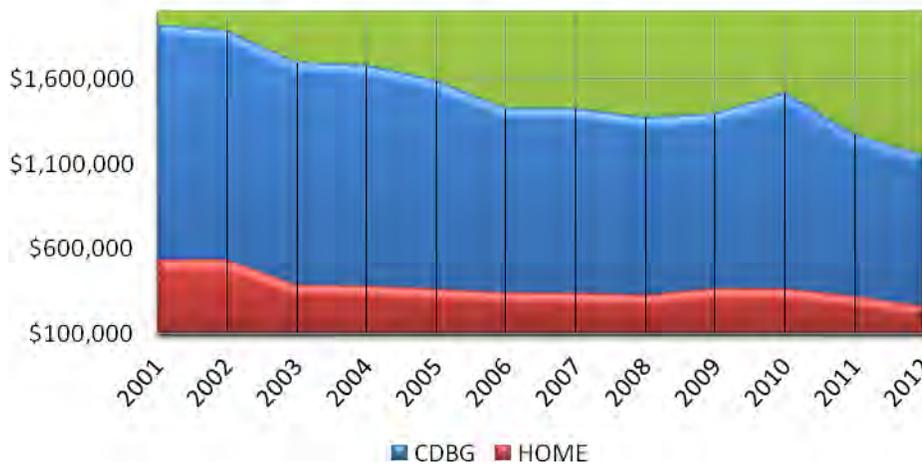
Homebuyer Rehabilitation (HOME) – the tactical acquisition and rehabilitation of vacant homes to be sold to low- to medium-income homeowners will be the activity of choice for the Community Development Department and the City's CHDO, CAA. With this method, low- to moderate-income families will not be confined to distressed neighborhoods, but will have options to live in cleaner, safer areas of the City in which to grow a family.

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

Program Specific Requirements

Program Year 2012 is especially challenging for the City of Jackson with the drastic reduction in both CDBG and HOME formula allocations received from HUD. The City will receive 40% less in CDBG funds and 51% less in HOME funds than it did a dozen years ago. As demonstrated in the graph below, grant funding has decreased consistently since 2001 with the exception of an increase in funds in 2010 during the nation's economic recovery efforts. However, in just two years, the City will receive 24.3% less in block grant and 28% less in HOME funds to invest into the community. Grant funding is at the lowest levels the City has seen, which required City leaders to make difficult but necessary cuts to community services.

Annual CDBG/HOME Formula Allocations



Community Development Block Grant

HUD has allocated \$1,147,952 in CDBG funds to the City; coupled with \$75,000 in anticipated program income, the PY 2012 budget is established at \$1,222,952. Even though the City's CDBG program will look different from a social services standpoint, Jackson still anticipates no less than 70%, and more likely 95% to 100%, of the grant funding will be used for activities that provide a benefit to low- and moderate-income persons.

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: 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)		

Total Allocation to Public Services: \$40,000 (3.3%)

CDBG regulations place a 15% cap on the amount of funding that can be obligated to public service activities. In order to financially support the commencement of the JNES program, City Council determined it would only be able to sustain one project under the public services cap. The King Center Summer Youth Program is a City-sponsored youth program proven to be extremely successful and beneficial to approximately 400 low- and moderate-income City youths. Participants 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.

Administration and Planning

Project: Administration and Planning Agency: Community Development Department	Target Area n/a	Total Funding \$215,000
		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: \$215,000 (17.6%)

Under CDBG regulations, costs charged to administrative and planning are subject to a statutory 20% cap. Program administration costs include staff and related costs required for overall program management, coordination, monitoring, reporting and evaluation. Planning costs would include, but are not limited to, studies, analysis, data gathering, preparation of plans, and identification of actions that will implement plans.

Other Projects

Project: Code Enforcement Agency: Community Development Department	Target Area Eligible CDBG areas City-wide	Total Funding \$535,000
		Planned Units
Output: Improved neighborhoods and properties		1,455
Indicator: Number of blight ordinance violations cited, rental inspections conducted, or LMI households assisted		1,455
HUD Outcome/Objective: (SL-3) Sustainability for the purpose of Suitable Living Condition (15 Code Enforcement 570.202(c), LMA, other)		

Project: Neighborhood Economic Stabilization – Demolitions Agency: Community Development Department	Target Area City-wide	Total Funding \$225,952
Output: Demolish vacant, abandoned, severely blighted, and dilapidated housing		Planned Units 15
Indicator: Number of decrepit residential structures removed		15
HUD Outcome/Objective: (SL-3) Sustainability for the purpose of Suitable Living Environment (4 Clearance and Demolition) 570.201(d), LMA, Other)		

Project: Residential Rehabilitation Agency: Community Development Department	Target Area City-wide	Total Funding \$145,000
Output: Improved housing conditions		Planned Units 35
Indicator: Number of LMI households assisted		35
HUD Outcome/Objective: (DH-3) Sustainability for the purpose of Decent Housing (14A Rehab; Single-Unit Residential 570.202, LMH, 10 Housing Units)		

Project: Code Enforcement Agency: City Attorney's Office	Target Area CDBG-eligible areas	Total Funding \$52,000
Output: Legal support to Community Development Department to improve neighborhoods and properties		Planned Units 350
Indicator: Number of citations receiving benefit of prosecutorial service or contract reviews		350
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 \$10,000
Output: Improve accessibility for disabled and elderly residents		Planned Units 4
Indicator: Number of sidewalks with improved accessibility		4
HUD Outcome/Objective: (SL-1) Accessibility for the purpose of Suitable Living Environment (03L Sidewalks 570.201(c), LMA, 11 Public Facilities)		

Total Allocation to Other Projects: \$967,952

With new leadership in place, the Jackson City Council has changed its strategy on rebuilding the City's neighborhoods from street paving/reconstruction to enhanced code enforcement, substantial demolition of dilapidated housing, and select rehabilitation of existing housing deemed salvageable and able to improve the neighborhood in which it is sited. The Department of Public Works will also receive funding to continue its program to install handicap curb ramps in key locations throughout the City to improve accessibility for disabled and/or elderly residents.

In addition to the CDBG formula allocation to be received from HUD, the City anticipates generating program income in PY 2012-13 as follows:

Activity	Program Income
Penalties from non-payment of code enforcement fees	\$ 1,000
Rehabilitation deferred loan repayments	4,000
HOME Administration	25,500
EDI loan repayments	15,750
Code enforcement fees	25,000
Miscellaneous program income	3,750
Total estimate program income	<u>\$75,000</u>

Program income is defined as the gross income directly generated from the use of CDBG or HOME funds.

HOME

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

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

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

Jackson City Council made the following 2012-2013 HOME allocations:

Project: Residential Rehabilitation Agency: Community Development Department	Target Area City-wide	Total Funding \$184,391
Output: Improved housing conditions		Planned Units 8
Indicator: Number of LMI households assisted		8
HUD Outcome/Objective: (DH-3) Sustainability for the purpose of Decent Housing (14A Rehab; Single-Unit Residential 570.202, LMH, 10 Housing Units)		

Project: Administration Agency: Community Development Department	Target Area n/a	Total Funding \$25,500
Output: Administration of the HOME program		Planned Units n/a
Indicator: none required		
HUD Outcome/Objective: 21A General Program Administration 570.206		

Project: Acquisition/Rehabilitation/Resale Agency: Community Action Agency (CHDO Reserve)	Target Area City-wide	Total Funding \$40,000
		Planned Units
Output: Improved housing conditions		2
Indicator: Number of LMI households assisted		2
HUD Outcome/Objective: (DH-3) Sustainability for the purpose of Decent Housing (14G Acquisition for Rehabilitation 570.202, LMH, 10 Housing Units)		

Project: CHDO Operating Expenses Agency: Community Action Agency	Target Area n/a	Total Funding \$12,500
		Planned Units
Output: Operating expenses related to CHDO activities		n/a
Indicator: none required		
HUD Outcome/Objective:		

Total HOME Allocations: \$262,391

These allocations were made with the following regulatory program thresholds in mind:

Activity	Threshold	Funding
Administration	No more than 10% of annual allocation	\$26,239
CHDO Set-Aside	No less than 15% of annual allocation	\$39,359
CHDO Operating Expenses	No more than 5% of annual allocation	\$13,119

Jackson's CHDO, CAA, and Community Development staffs will collaborate to strategically acquire and rehabilitate vacant homes to be sold to low- to moderate-income homebuyers. With this method, low- to moderate-income families will not be confined to distressed neighborhoods, but will have options to live in cleaner, safer areas of the City in which to grow a family. Other projects, such as homeowner rehabilitation and/or homebuyer assistance, will be considered on a case-by-case basis and funded when doing so furthers the goals and objectives of the underlying JNES program.

Administration fees will be used as program income for the CDBG program and become part of the CDBG budget. The City does not intend to use HOME funds to refinance existing debt secured by multi-family housing, nor provide Tenant-Based Rental Assistance. Proposed projects will not contain five or more HOME-assisted housing units.

Outreach to Minority and Women-Owned Businesses

Unlike large cities that may have many women- and minority-owned businesses to work with, the City of Jackson has limited resources from which to pull from. The City has an approved bidders list of general contractors from which it solicits rehabilitation bids; currently, the approved bidders list has one woman-owned and two minority-owned businesses. Plans are in place to expand the approved bidders list by advertising its existence in surrounding counties and encouraging general contractors to apply. The Community Development Department hopes this advertising campaign will increase the number of qualified general contractors and attract additional women- and minority-owned businesses to apply to be on the list.

With other construction projects, such as street reconstruction, the City's Purchasing Department advertises in trade journals, the local newspaper, and on the City's website.

Purchasing also maintains a database of approximately 200 entities that have registered to receive project notifications via e-mail; each time a new project is added to the website, an e-mail blast is sent out announcing the request for bids. Purchasing also utilizes the State of Michigan's website to send e-mail or postcard notifications to disadvantaged businesses.

Jackson follows the procurement standards outlined in 24 CFR 85.36. All procurement transactions are conducted in a manner providing full and open competition. The sealed bid process is utilized for all construction projects, including rehabilitation, outlined under 85.36(d)(2). The City does not discriminate against a business or bidder with respect to soliciting, evaluating, and awarding bids on the basis of race, sex, sexual orientation, color, ethnicity, or national origin.

Housing Opportunities for Persons with AIDS (HOPWA)

The City of Jackson does not receive HOPWA funding.

Emergency Solutions Grant (ESG)

The City of Jackson does not receive ESG funding; however, ESG funding is provided by the Michigan State Housing Development Authority to the Jackson County Continuum of Care.

Other Narratives

Reprogramming of Funds

As indicated above in the Substantial Amendment section of this Action Plan, the City intends to devote substantial funding toward demolition of vacant, abandoned, and dilapidated housing. A financial assessment of CDBG funds determined the need to reprogram funds from activities that were:

- Completed, but have fund balances that cannot be spent;
- Not completed, but the project is no longer in operation; or,
- Unable to get the activity started.

A substantial amendment to reprogram funds from previous year Action Plans is required as follows:

Subrecipient	Original Award	Remaining Balance
Program Year 2005		
New Neighbor Program	\$80,000	\$3,728
Program Year 2008		
Residential Rehabilitation	\$58,980	\$23,096
DDA Façade	\$18,000	\$12,974
Program Year 2009		
Residential Rehabilitation	\$88,000	\$88,000
Program Year 2010		
Denied Loans	\$1,000	\$1,000
Residential Rehabilitation	\$60,000	\$60,000

Subrecipient	Original Award	Remaining Balance
Cleanup	\$10,000	\$10,000
JPD Radios	\$7,752	\$146
Program Year 2011		
Residential Rehabilitation	\$50,027	\$50,027
Job Creation	\$20,000	\$20,000
Total CDBG	\$393,759	\$268,971

A total of \$268,971 will be reprogrammed to support the initiation of the Jackson Neighborhood Economic Stabilization Demolition program. Other funding that may be identified as available for reprogramming from time to time during fiscal year 2012-2013 may also be designated for use by this activity.

Appendix A

Citizen Comments

January 24, 2012 Public Hearing

Project	Comment	Accepted	Not Accepted	Reason
AWARE, Inc. Client Advocate Positions	The Executive Director spoke in favor of AWARE receiving funding for its Client Advocate positions. AWARE did not expect to become reliant on the City's CDBG funds, but there are little other resources available.		X	Funding was not provided for this program due to the reduction of CDBG funds received from HUD.
Center for Family Health Emergency Adult Dental Care	Two persons spoke on behalf of the dental program receiving funding as it is the only dental program in town that serves low-income persons regardless of their ability to pay		X	Funding was not provided for this program due to the reduction of CDBG funds received from HUD.
Home of New Vision Historic Preservation - Exterior Painting	Two persons associated with the Home of New Vision explained to City Council the need for assistance to paint the exterior of this historic building leading into the City.		X	Funding was not provided for this program due to the reduction of CDBG funds received from HUD.
Jackson Affordable Housing Corp. Homeownership Counseling Downpayment Assistance CHDO Activities	The Executive Director of JAHC requested funding for several programs. JAHC would like to be selected to serve as the City's CHDO for HOME funds. Without program funding in the next fiscal year, JAHC's existence will be jeopardized.		X	Funding was not provided for this program due to the reduction of CDBG/HOME funds received from HUD.
Jackson School of the Arts Access to Arts for All Children	The Executive Director stated that although the grant request is small, it is a vital source of funding for programs; last year 64% of kids in the program were from the City of Jackson with a majority at or below poverty level		X	Funding was not provided for this program due to the reduction of CDBG funds received from HUD.
John George Home Dining Room Expansion	The Executive Director addressed City Council and respectfully withdrew the application for CDBG funds, stating the John George Home was aware of the severe reduction in grant funds to be received by the City and the level of donations received to date will allow the project to be completed without CDBG funding.	X		City Council accepted the withdrawal of the application for CDBG funding for the John George Home's dining room expansion project.
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	X		Funding is recommended, but at a reduced level than what was requested.

Project	Comment	Accepted	Not Accepted	Reason
The Salvation Army Utility Shutoff Prevention	The commanding officer of The Salvation Army discussed the continued increased need of low- and moderate-income residents for assistance in keeping utilities on in their homes		X	Funding was not provided for this program due to the reduction of CDBG funds received from HUD.
Training and Treatment Innovations Case Management	A person associated with Training and Treatment Innovations explained to City Council the need for CDBG funding to provide SOAR (SSI/SSDI, Outreach, Access and Recovery) case management services to persons in the community who are homeless and have a major mental illness.		X	Funding was not provided for this program due to the reduction of CDBG funds received from HUD.

Action Plan

At the April 24, 2012 regular City Council meeting, no written or oral comments were received regarding the 2012-2013 Action Plan or Substantial Amendment.

Appendix B

City Council Resolution

Dated May 8, 2012

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, and the Cranston-Gonzalez National Affordable Housing Act of 1990, as amended; 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 2012-2013 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

Appendix C

Certifications



Non-State Grantee Certifications

City of Jackson
161 W. Michigan Avenue
Jackson, MI 49201
(517) 768-6436
www.cityofjackson.org

Non-State Government Certifications

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the City of Jackson certifies that:

Affirmatively Further Fair Housing. The City of Jackson 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 the analysis and actions in this regard.

Anti-displacement and Relocation Plan. The City of Jackson will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 USC 4601), and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement 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. The City of Jackson 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 City of Jackson's 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 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
3. 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 City of Jackson 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 and HOME funds are consistent with the strategic plan.

Section 3. The City of Jackson will comply with section 3 of the Housing and Urban Development Act of 1968 (12 USC 1701u), and implementing regulations at 24 CFR 135.

Specific CDBG Certifications

The City of Jackson 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 and expand economic opportunities primarily for persons of low and moderate income.

Following a Plan. It is following a current consolidated plan that has been approved by HUD.

Use of funds. It has complied with the following criteria:

1. *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;
2. *Overall Benefit.* The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) **2012, 2013, 2014** (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 at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.
3. *Special Assessments.* It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guarantee 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 attributable 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 City of Jackson 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. In addition, with respect to properties owned and occupied by moderate-income (but 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 City of Jackson certifies that it lacks CDBG funds to cover the assessment.

Excessive Force. 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 that 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 24 CFR 35, subparts A, B, J, K, and R of this title.

Compliance with laws. It will comply with applicable laws.

Specific HOME Certifications

The HOME participating jurisdiction (City of Jackson) certifies that:

Tenant-Based Rental Assistance. If the City of Jackson 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 24 CFR 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.

Dated: May 10, 2012



Martin J. Griffin, Mayor, City of Jackson
161 West Michigan Avenue
Jackson, MI 49201
(517) 788-4028

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, US 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 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 not 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 3).
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 21.

Place Name	Street	City	County	State	Zip
City of Jackson	161 W Michigan Ave	Jackson	Jackson	MI	49201
City of Jackson	521 Water St	Jackson	Jackson	MI	49203
King Community Center	1107 Adrian	Jackson	Jackson	MI	49203
Community Action Agency	1214 Greenwood Ave	Jackson	Jackson	MI	49203

7. Definitions of terms in the Non-procurement 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 substances in Schedules I through V of the Controlled Substances Act (21 USC 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 is 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

Dated: May 10, 2012



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