

JACKSON

Founded 1829

HOME Investment Partnerships Program –
American Rescue Plan (HOME-ARP)

2023 Allocation Plan



Prepared by:
Department of Community Development
161 W. Michigan Ave, 3rd Floor
Jackson MI 49201
517-768-6461



Table of Contents

HOME-ARP Allocation Plan

Introduction	1
Consultation	1
Public Participation	4
Needs Assessment and Gaps Analysis	6
HOME-ARP Activities	15
HOME-ARP Production Housing Goals	17
Preferences.....	18
Limitations in a HOME-ARP Rental Housing or NCS Project	18

Appendices

- SF-424
- SF-424 B
- SF-424D
- Certifications

HOME-ARP Allocation Plan

Participating Jurisdiction:	City of Jackson	Date:	March 27, 2023
Grant Number:	M21-MP260214	Total Grant Amount:	\$1,137,398

Introduction

On September 21, 2021, the City of Jackson was notified that it was eligible to receive \$1,137,398 in HOME Investment Partnerships Program – American Rescue Plan (HOME-ARP) funds from the U.S. Department of Housing and Urban Development upon approval of this Allocation Plan. The purpose of this supplemental funding is to provide homelessness assistance and supportive services through several eligible activities, which include:

- Production or preservation of affordable housing
- Tenant based rental assistance (TBRA)
- Supportive services (including homeless prevention services and housing counseling)
- Purchase or development of non-congregate shelters
- Administration and planning
- Non-profit operating and capacity building assistance

To receive funding, the City must develop and submit to HUD this Allocation Plan, which includes an outline of the consultation and public participation processes undertaken, an assessment of the needs of qualifying populations and gaps in local housing and services systems, and planned uses for HOME-ARP funds for prioritized populations and eligible activities. The Allocation Plan describes the distribution of HOME-ARP funds and identifies any preferences for eligible activities which primarily assist the following HOME-ARP qualifying populations:

- Homeless persons, as defined by the McKinney-Vento Act at 24 CFR 91.5
- Persons at risk of becoming homeless, as defined by the McKinney-Vento Act (24 CFR 91.5)
- Those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking as defined by the Violence Against Women Act (VAWA) at 24 CFR 52003 and Trafficking Victims Protection Act (TVPA) of 2000, as amended, at 22 USC 7102
- Other populations where assistance would prevent the family's homelessness or serve those with the greatest risk of housing instability
- Veterans and families that include a veteran family member that meet one of the preceding criteria

Consultation

In accordance with Section VA of the HOME-ARP Notice, CPD-21-10, before developing its HOME-ARP Allocation Plan, at a minimum, a participating jurisdiction (PJ) must consult with:

- Continuum(s) of Care (CofC) serving the jurisdiction's geographic area
- Homeless service providers
- Domestic violence service providers

- Veterans groups
- Public housing agencies (PHAs)
- Public agencies that address the needs of the qualifying populations
- Public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities

This HOME-ARP Allocation Plan was prepared in consultation with agencies whose clientele includes HOME-ARP qualifying populations. Numerous methods of communication were used, including email, virtual meetings, and face-to-face meetings. A survey was also distributed to all members of the Jackson Continuum of Care, and feedback received from that survey was also used in the creation of this Allocation Plan. An outline of all communication with relevant community and social service agencies can be found below (table 1). A complete list of agencies contacted in the creation of this report can also be found below (table 2).

Consultation Timeline (Table 1)

Date	Method	Entity	Notes
09/20/21	Email	Continuum of Care (CoC) Leaders	First introduction that City received HOME-ARP funds and potential uses
10/05/21	Email	CoC Leaders	Reminder about HOME-ARP and potential uses
03/10/22	Email	CoC Leaders	More in-depth information about HOME-ARP
03/29/22	Virtual Mtg	CoC Steering Committee	Requested spot on 4/5/22 agenda; discussed HOME-ARP and potential uses; provided handouts for meeting
04/05/22	Virtual Mtg	CoC	Presented to CoC - began discussion of best uses for HOME-ARP in our community; encouraged survey completion
04/06/22	Email	Aware Shelter	Directly solicited Aware's participation in CoC workgroup
04/08/22	Email	CoC Workgroup	Kickoff; listed gaps/needs heard at 4/5 CoC mtg
04/18/22	Email	CoC Workgroup	Encouraged thoughts on needs as no responses to 4/8 email. A few follow up emails were received
04/20/22	Email	Dept of Diversity, Equity & Inclusion; Human Relations Commission; Racial Equity Commission	Offered opportunity for DEI/HRC/REC to participate in consultation process; provided background information and offered to discuss further/present
04/20/22	Email	Jackson Housing Commission (JHC)	Directly requested their involvement in consultation process as public housing authority
04/20/22	Email	disAbility connections	Directly requested their involvement in consultation process as provider for disabled
04/20/22	Email	Legal Services of South Central Michigan	Directly requested their involvement in consultation process as legal services provider
04/20/22	Email	Community Action Agency (CAA) CEO	Directly requested details for education/employment training ideas
04/26/22	Face-to-Face	Dept of Diversity, Equity & Inclusion; Human Relations Com.; Racial Equity Com.	Met with John Willis, Chief Equity Officer for the City's Dept of Diversity, Equity, and Inclusion; also staffs the HRC and REC and is involved with various other organizations
02/02/23	Email	Aware Shelter	Received updated annual report on domestic and sexual violence in Jackson
02/02/23	Virtual Mtg	King Community Homes	Received information on possible projects for affordable rental housing
02/08/23	Email	CAA CEO	Received information on possible projects and additional agency needs; received updated homeless needs and gaps analysis data

Organizations Consulted (table 2)

Agency/Org Consulted	Type of Agency/Org	Method of Consultation
Kate Martin Works	Continuum of Care	Email, Zoom meetings, survey, CoC Workgroup
Jackson Housing Commission	Continuum of Care Public Housing Agency	Email, Zoom meetings, survey, CoC Workgroup, direct solicitation
Dept. of Human Health & Services	Continuum of Care Public Agency the Addresses Needs of QP	Email, Zoom meetings, survey, CoC Workgroup
ARE Drop-in Center	Continuum of Care	Email, Zoom meetings, survey, CoC Workgroup
Do'Chas II	Continuum of Care	Email, Zoom meetings, survey, CoC Workgroup
Community Action Agency	Continuum of Care Homeless Service Provider Veterans' Groups	Email, Zoom meetings, survey, CoC Workgroup, direct solicitation
Training & Treatment Innovations	Continuum of Care Homeless Service Provider	Email, Zoom meetings, survey, CoC Workgroup
Aware Shelter	Continuum of Care Domestic Violence Shelter	Email, Zoom meetings, survey, CoC Workgroup
Jackson Interfaith Shelter	Continuum of Care Homeless Shelter	Email, Zoom meetings, survey, CoC Workgroup
Region II Area Agency on Aging	Continuum of Care	Email, Zoom meetings, survey, CoC Workgroup
Henry Ford Health	Continuum of Care	Email, CoC Workgroup, direct solicitation
City of Jackson Dept. of Diversity, Equity & Inclusion	Public Agency that Addresses Fair Housing and Civil Rights	In-person meeting with Director, email, survey
City of Jackson Human Relations Commission	Public Agency that Addresses Fair Housing and Civil Rights	In-person meeting with Director, email, survey
City of Jackson Racial Equity Commission	Public Agency that Addresses Fair Housing and Civil Rights	In-person meeting with Director, email, survey
disAbility Connections	Continuum of Care Private Agency that Addresses Needs of Persons with Disabilities	Email, Zoom meetings, survey, direct solicitation
Legal Services of South Central Michigan	Continuum of Care	Email, Zoom meetings, survey, direct solicitation

Summary of feedback received and results of upfront consultation with these entities

Consultation with the various groups listed above provided a healthy list of needs, many of which were not an eligible use of HOME-ARP funding or feasible as a project. Some of the suggestions included:

- Laundry facilities
- Shower facilities
- Solutions for those with mental health issues who may commit violent acts while sheltered
- Solutions for those who get jobs and lose benefits, such as insurance
- Reserve fund to cover damages caused by housing a tenant with a Housing Choice Voucher or some other housing assistance
- The construction of tiny homes
- Transitional Housing
- Housing navigator / landlord/tenant liaison
- Staff for “light touches”

Feedback from the Continuum of Care member survey highlighted numerous significant needs in our community. All responding agencies serve individuals from multiple “qualifying populations” (as defined for the HOME-ARP program). When asked to rank-order possible solutions based on HOME-ARP eligible activities, all respondents selected “the development of and support for affordable rental housing” as either their first or second choice. Additional suggestions from this survey included:

- The creation of adequate, affordable housing
- 1 and 2-bedroom affordable housing
- Transportation and hotel stays
- Mental health assistance

Feedback from Legal Services of South Central Michigan focused on the following areas:

- Eviction/foreclosure assistance
- Debt collection
- Criminal record expungement
- Divorce/custody services
- Accessing and restoring public benefits

Public Participation

In accordance with Section V.B. of the HOME-ARP Notice, CPD-21-10, participating jurisdictions (PJs) must provide for and encourage citizen participation in the development of the HOME-ARP Allocation Plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current Citizen Participation Plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP Allocation Plan and prior to submission.

Public participation process

On February 18, 2023, a public notice outlining the details of plan availability, public hearing, and public comment period was published in the Jackson Citizen Patriot, and through the City’s website and social media pages. The draft HOME-ARP Allocation Plan was made available for review and public comment from February 28 through March 15, 2023, and a public hearing was held before the City of Jackson City Council on March 7, 2023. A hard copy of the draft Allocation Plan was placed at two locations within City Hall, at the three Jackson Housing Commission complexes (Reed Manor, Chalet Terrace, and Shahan-Blackstone North), the Jackson District Library’s Carnegie Branch, and the Community Action Agency. The draft Allocation Plan was also available on the City of Jackson’s website: <http://www.cityofjackson.org/332/Grant-Reports>. Citizens had the opportunity to submit written comments via mail or email to:

City of Jackson
Cory Mays, Grant Coordinator
161 W. Michigan Avenue, 3rd Floor
Jackson, MI 49201
cmays@cityofjackson.org

Efforts to broaden public participation

Copies of the draft participation plan were available for public review at the following locations in the City of Jackson:

- City Hall (161 W. Michigan Avenue, Jackson, MI), on the first and third floors
- Jackson District Library, Carnegie Branch (224 W. Michigan Avenue, Jackson, MI)
- Community Action Agency (1214 Greenwood Avenue, Jackson, MI)
- Shahan-Blackstone North Apartments (109 Shahan Drive, Jackson, MI)
- Reed Manor (301 Steward Avenue, Jackson, MI)
- Chalet Terrace (316 Barberry Drive, Jackson, MI)

An invitation for public comments was also displayed on the City of Jackson’s website and social media pages.

Summary of comments received through the public participation process

At the March 7, 2023 Public Hearing, comments were received from 4 individuals and included:

- Recommendation to increase the allocation for supportive services
- Recommendation for the City not to accept these or future federal funds
- Recommendation to spend HOME-ARP funds on a dump truck and claw bucket truck for storm cleanup
- Request to see feedback from “Residents in Action” and “Lifeways” included in the HOME-ARP Allocation Plan
- Concerns regarding high rental rates compared to household income levels
- Unrelated comments concerning non-profit work in the City of Jackson

Additional comments were received during the 15-day public comment period, via email and/or telephone. These comments were provided by 6 individuals, and included:

- Recommendation for the City not to accept these or future federal funds
- Recommendation to purchase the former Allen School, a now-vacant multi-story building just East of downtown Jackson and adjacent to the hospital
- Recommendation to use now-vacant prison space for homeless housing
- Recommendation to use “FlashVote” to collect community feedback
- Recommendations for various homeless shelter devices, including rooftop tents, camping gear, and other temporary outdoor shelters
- Concerns regarding the use of HOME-ARP funds for the rehabilitation of existing rental properties, citing specific concerns with landlord assistance
- Unrelated comments concerning non-profit work in the City of Jackson

Summary of comments or recommendations not accepted, and why

No comments or views were declined by the Jackson City Council. Due to various federal rules and regulations, and based on past positive performance of certain current programs, the City is not able to enact some suggestions. Other feedback received was unrelated to the HOME-ARP plan, but was noted in our files with additional follow-up communication with commenters when possible.

Needs Assessment and Gaps Analysis

Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	24	8	62		0								
Transitional Housing													
Permanent Supportive Housing	14	4	21		0								
Other Permanent Housing													
Sheltered Homeless						24		2					
Unsheltered Homeless							4						
Current Gap													

Source: 2022 Housing Inventory Count Report

Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	5,902		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	606		
Rental Units Affordable to HH at 50% AMI (Other Populations)	372		
0% - 30% AMI Renter HH w/1 or more severe housing problems (At-Risk of Homelessness)		774	
30% - 50% AMI Renter HH w/1 or more severe housing problems (Other Populations)		399	
Current Gaps			1,173

Source: 2021 American Community Survey 5-Year Estimates, Table DP04; 2021 American Community Survey Table B25070

Size and demographic composition of qualifying populations within the PJ's boundaries

Housing Problems (Households with one of the listed needs)

	Number of Households - Renter				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	1,635	450	60	4	2,149
Having none of four housing problems	655	710	1,185	450	3,000
Household has negative income, but none of the other housing problems (plumbing)	230	0	0	0	230
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	105	0	15	0	120
Housing cost burden greater than 50% of income (and none of the above problems)	1,470	365	15	4	1,854
Housing cost burden greater than 30% of income (and none of the above problems)	325	365	565	115	1,370
Zero/negative Income (and none of the above problems)	230	0	0	0	230

Severe Housing Problems

Data Source: 2011-2015 CHAS

The two immediately preceding tables were extracted from the City of Jackson’s 2020 – 2024 Five-Year Consolidated Plan for CDBG and HOME. Staff reviewed American Community Survey (ACS) 5-Year Estimates for 2017, 2018, 2019, 2020, and 2021 Tables DP04 (Housing) and B25070 (Gross Rent as a Percentage of Household Income in the Past 12 Months) for comparative purposes. Median gross rent ranged from \$662 in the 2017 ACS to \$782 in the 2021 ACS, an increase of over 15%. Anecdotal information received through consultation indicates gross rents have increased even more than that – possibly as high as a 30% increase.

Homeless as defined in 24 CFR 91.5

Homeless is defined in 24 CFR 9.15 as an individual who lacks a fixed, regular, and adequate nighttime residence, and an individual whose has a primary nighttime residence that is:

- A supervised publicly or privately-operated shelter designed to provide temporary living accommodations;

- An institution that provides a temporary residence for individuals intended to be institutionalized; or,
- A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

The 2020 Decennial Census reported the City experienced a 6.6% decline in residents over a ten year period, reporting a total of 31,309 persons residing within the jurisdiction. The 2020 American Community Survey 5-Year Estimate, which combined survey data collected between 2016 and 2020, reports a City population of 32,251.

The 2021 Point in Time (PIT) Count reported 76 persons in households without children in an emergency shelter and one in transitional housing. Forty-one (41) persons in an emergency shelter consisted of at least one adult and one child, while one person in the emergency shelter was an unaccompanied youth.

The Jackson County CoC reported a total of 597 homeless households consisting of 779 people were served between October 1, 2021 and September 30, 2022. The average length of homelessness was 60 days with 39% exiting to permanent destinations. Seven (7%) percent of those who exited experienced another homeless episode within six (6) months.

At Risk of Homelessness as defined in 24 CFR 91.5

Similar to the definition of Homeless described above, an additional factor is if the individual or family has an annual income below 30% of median family income in the area. The current levels for 30% of area median income, adjusted for household size, is:

2022 Area Median Income Limits								
Median Family Income \$84,300								
Number of Persons in Household								
% of Median	1	2	3	4	5	6	7	8
30%	\$15,250	\$17,400	\$23,030	\$27,750	\$32,470	\$37,190	\$41,910	\$46,630

Nearly 33% of the City’s households earn less than \$25,000 annually, with 24.1% of all residents living below the Federal poverty level. Families consisting of a female head of household with children under 5 years of age experience the highest incidence of poverty at 48.7%

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

As noted above, this population includes any individual or family who is fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. It also includes cases where any individual or family reasonably believes there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions, including against a child, which has either taken place within the primary nighttime residence or has made them afraid to return or remain within the same dwelling unit.

During fiscal year 2021, 3,275 nights of shelter were provided to 129 adults and 74 children, averaging 32 nights per family. The 24-hour crisis line fielded a total of 826 calls. Non-residential services included:

- 116 survivors of domestic and sexual violence received crisis support through individual counseling services and 95 survivors through support groups.
- 204 adults and children received assistance with filing Personal Protection Orders, information about the legal process, victim notification, safety planning, and referrals.
- The sexual assault response team provided support and advocacy to 89 survivors, 30 of whom received advocacy and support during a medical forensic exam.
- The Jackson County Family Visitation Center provided 212 monitored visits to 95 families (duplicated count).
- AWARE, Inc. reached 176 individuals through community awareness and training on domestic violence, sexual assault, and its services.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

This group is defined as households who have previously been qualified as “homeless,” but are currently housed due to temporary or emergency assistance, but may need additional housing assistance or supportive services to avoid a return to homelessness. During the period between October 1, 2021 and September 30, 2022, 181 homeless households served by the Continuum of Care agencies exited homeless to a permanent destination (39%), most going to live with family. Friends was the most common temporary destination for 193 households (41%) exiting homelessness while 20% of the households assisted (95) exited to an unknown destination.

Between October 1, 2021 and March 30, 2022, comprising the first six months of the reporting period, 229 households had exited homelessness with 17 households (7%) returning to homelessness. Households experiencing first-time homelessness and/or had a disabled member in the household were more likely to experience another homeless episode.

Current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing

The City of Jackson has a current network of social service agencies that provide assistance to the Jackson homeless community:

- **Jackson Interfaith Shelter:** local emergency shelter providing 46 family beds, 32 adult only beds, and 10 overflow beds.
- **AWARE, Inc:** 22 family beds, 8 adult only beds specifically for survivors of domestic or sexual violence.
- **Region 2 Area Agency on Aging:** 7 motel vouchers
- **Permanent Supportive Housing:** 67 family beds, 36 adult only beds for chronically homeless; 4 veteran beds.
- **Rapid Re-Housing:** 45 family beds, 31 adult only beds, 30 veteran beds.
- **Residents in Action:** see below, short-term solution

During the months of December 2022 through March 2023, the City of Jackson also invested over \$200,000 in American Rescue Plan Act (ARPA) funds to shelter, feed, and meet other needs of homeless in the community. These funds were allocated, and administered, by both City of Jackson employees and volunteers/contract employees from Residents in Action (RIA), a grassroots organization in Jackson. To date, a total of 62 households have received assistance from this program, and the waiting list for those still in need of temporary housing is 269. Assistance includes:

- Short and longer-term hotel stays
- Food, clothing, and personal items
- Assessments for additional services and “next step” options

The City of Jackson also has existing housing providers, stakeholders, and agencies that provide affordable housing units, supportive services, and counseling for low-income renters, including:

- Community Action Agency (CAA): rental assistance and counseling, rapid rehousing assistance, foreclosure prevention, housing choice vouchers, rehabilitation and weatherization assistance
- Greater Jackson Habitat for Humanity (GJHFH): critical home repairs program, rehabilitation of existing rental structures, and creation of newly-constructed housing units
- Jackson Housing Commission (JHC): management of 540 public housing units, 475 housing choice vouchers, and a HUD “Choice Neighborhoods Planning Grant” recipient
- City of Jackson Community Development Department: Homeowner rehabilitation and emergency hazard loan/grant program
- Jackson CoC: Emergency shelter and permanent supportive housing assistance (through various partner organizations)

The Community Action Agency (CAA) is the lead agency for the Continuum of Care, and also serves as their fiduciary. Funding levels for various programs utilizing state/federal funding include:

	HUD CoC	MSHDA ESG	MSHDA ESG-CV	MSHDA EDP
FY 2020	\$910,212	\$249,784	\$940,403	\$109,070
FY 2021	\$889,666	\$267,079	N/A	N/A
FY 2022	App. Pending	\$256,396	N/A	N/A

The Continuum of Care also received two rounds of funding from MSHDA from the Covid Emergency Rental Assistance Funds (CERA), totaling \$10,273,726.20.

Gaps within the current shelter and housing inventory as well as the service delivery system

On November 9, 2021, the Jackson City Council authorized the official creation of the Jackson Affordable Housing Development Board (AHDB). The intent of the Board is:

- To promote the health, safety and general welfare of the people of the City of Jackson, by serving as an advisory body to the Jackson City Council
- To propose remedies on the implementation of housing goals, objectives, and policies that support economically integrated housing opportunities in the development or rehabilitation of housing

- To stimulate the production and preservation of owner-occupied and non-owner occupied housing available to low income individuals or families
- To optimize benefits available to low and moderate-income residents by incentivizing affordable residential housing projects within the City of Jackson.

The mission of the AHDB is to promote safe, healthy, and affordable housing. Tasked with recommending the expenditure of \$3.5 million of funds from the American Rescue Plan Act (ARPA), this board is comprised of community members and provides recommendations to the Jackson City Council. To assist with the allocation of its ARPA funds, the City of Jackson contracted with Guidehouse, a national firm tasked with navigating the many federal regulations associated with ARPA funds. To aid the AHDB in their work, Guidehouse embarked on a multi-month study of housing needs in the City of Jackson. They recently released their Housing Strategy and Policy Framework, a comprehensive and data-driven analysis of Jackson’s current and future housing needs. Identified gaps include:

- 32% of households in Jackson are cost-burdened, meaning they pay more than 30% of their income toward housing costs. This is especially true in the lowest income levels (74% of extremely low-income earners and 37% of very low-income earners).
- Over half of Jackson renters (54%) are struggling to pay their rent.
- Gap in the available housing units, based on specific needs, include:
 - Units for families (expected household size in the next 10 years will be 2.4 persons)
 - Units for older populations (expected 35% increase in the population aged 55-79)
 - Rental units available for low-income earners (see above)

Feedback from the CoC member survey highlighted numerous service delivery gaps. All responding agencies serve individuals from multiple “qualifying populations” (as defined for the HOME-ARP program). These identified gaps include:

- Rent affordability
- Eviction and/or rental qualification assistance
- Mental health and other support services
- Services and housing for those convicted of criminal sexual conduct (CSC) crimes
- Affordable 1 and 2 bedroom units
- Affordable and adequate rental housing

From December 2022 through March 2023, Residents in Action (RIA) provided a bi-weekly report on homelessness, based on their work with the City’s homeless hotel program. All individuals/families served through this work were in the “homeless persons” qualifying population. Identified gaps within the current shelter and housing inventory included:

- Daytime warming center: The Jackson Interfaith Shelter is open from 11:00PM-6:00AM, but this is weather-dependent. No other facility covers the hours of 8:00AM-11:00PM, except the Home of New Vision Resource and Engagement Center (this is for recovery support and crisis only).
- Additional funding needed for more hotel stays and intervention services. There are currently 269 individuals on a waiting list for temporary housing.

Unmet housing and service needs of qualifying populations

Homeless as defined in 24 CFR 91.5

Conversations with local housing providers revealed affordable housing issues in Jackson may not necessarily be limited to a specific type of housing but rather addressing the issues that interfere with obtaining housing. Examples of barriers include, but are not limited to, the following:

- Educating landlords about the laws governing rental housing, including Fair Housing laws and prohibited discriminatory practices
- Unable to find landlord willing to accept housing choice vouchers
- Rents increasing exponentially, reducing availability of affordable housing to very low-income individuals and families
- Not enough housing for larger families
- Not enough housing for smaller families
- Transitional housing needed
- Educating tenants about their rights as it pertains to rental housing, including Fair Housing laws and awareness of discriminatory practices
- Exorbitant security deposits, non-refundable application fees, and unaffordable deposits for water accounts
- Limited public transportation options
- Poor credit history, especially for youth just out of college or persons facing unexpected life issues

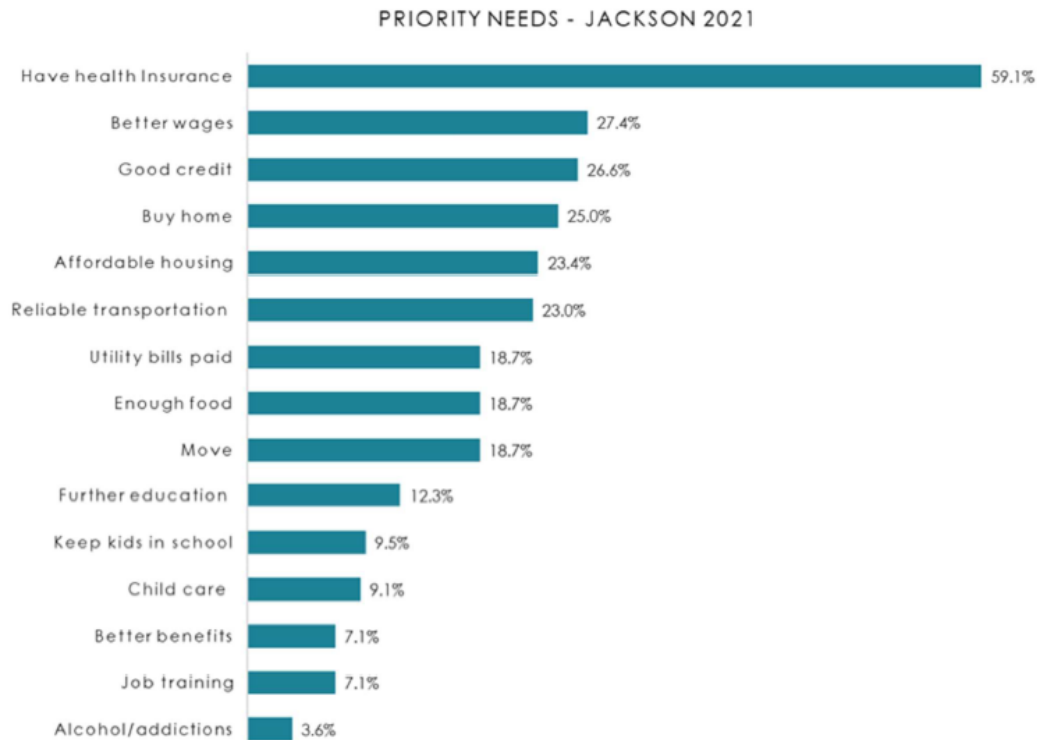
The City of Jackson cannot solve Jackson’s housing challenges alone, and HOME-ARP dollars can help fill the identified gaps. Key recommendation from the Guidehouse “Housing Strategy and Policy Framework” report include:

- The construction of 1,500 new units and the preservation of 3,000 existing unit over the next ten years (total of 4,500 units).
- Tenant support, to combat challenges with eviction and other tenant issues, in particular during Covid-19. Continuing to support tenants is key, including matching them with necessary housing and providing assistance to reduce the cost-burden in lower-income households. This will provide targeted assistance to those most at risk of homelessness.

The Community Action Agency (CAA), serving Jackson, Hillsdale and Lenawee Counties, published a Community Needs Assessment on February 2, 2023. Excerpts from that report include:

- “Jackson County had the lowest rate for clients choosing health insurance as the most important need right now (40.9%). The next most frequently selected primary needs were getting a job with better wages (27.4%) and having good credit (26.6%). Buying a home is ranked higher in Jackson County than any other county as one in four selected this primary need. Moving to a better neighborhood was selected nearly twice as frequently (18.7%) as the next closest county as well. Childcare and keeping kids in school were selected more frequently in Jackson County than in the other two counties.

- The ‘Buy a home’ selection is ranked higher in Jackson than in either other county, which may reflect the perceived shortfall in affordable rental housing. As the ‘Having utilities paid’ priority remains high in Lenawee and Hillsdale, this was not much of a priority for Jackson County where it ranked seventh in 2021.”
- See chart below



Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Aware, Inc. strives to eliminate domestic and sexual violence while promoting social change and empowering survivors by offering shelter and services. Their annual goals include: providing quality housing and services; empowering survivors to achieve their goals; securing resources to carry-out their mission, and; educating the community and promoting social change. They collaborate with other local agencies to provide emergency shelter services, various financial assistance programs, and non-residential crisis services. Their 2021 Annual Report highlighted the many facets of their impactful work, and conversations with staff further identified various unmet housing and service needs, including:

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

Other Populations where providing supportive services or assistance under section 212(a) of the National Affordable Housing Act (42 U.S.C. 12742(a)) would prevent the family’s homelessness or would serve those with the greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above but meet one of the following criteria:

- Other families requiring services or housing assistance to prevent homelessness

- Those at greatest risk of housing instability
- Veterans and families the include a veteran family member

Residents in Action (RIA) is a grassroots network of Jackson residents with a mission to advance racial equity for better health and well-being in the Jackson community. RIA convened initially in March 2020 to address the impact of Covid-19 on the Black community, and has had success with addressing other emerging and immediate needs in Jackson. Most recently, the City of Jackson partnered with RIA in December, 2022 to implement a homeless hotel program using American Rescue Plan Act (ARPA) funds. RIA is actively serving those most at risk of housing instability by providing temporary emergency hotel housing, food and clothing assistance, and other social services to families and individuals living in:

- Vehicles
- Tents/outside areas
- Couches or homes of a relative/friend
- Uninhabitable homes

Priority needs to qualifying populations

The housing and supportive services needs of the HOME-ARP qualifying populations are similar to the needs of the low-income population as a whole. All populations would benefit from an increased number of affordable housing units and increased affordability in the rental housing market. Rising rent and limited availability of affordable housing units increases instability among cost-burdened and low-income renters (including those at risk of homelessness). Among those experiencing homelessness, the lack of affordable rental units often creates a bottleneck in the availability of stable housing options, creating longer episodes of homelessness and leading to fewer overall households becoming housed in stable situations. In addition to housing and rental needs, emergency housing/shelter options remain a high priority. Data provided points to three main areas of need for these HOME-ARP funds, including:

- Rehabilitation of existing rental housing
- Construction of new affordable rental housing
- Supportive services

How the PJ determined the level of need and gaps in the PJ’s shelter and housing inventory and service delivery systems based on the data presented in the plan

City staff reviewed all feedback from social service agencies, non-profits, and community groups. The individuals working with/for these agencies are the “boots on the ground” experts, and their analysis of current conditions is crucial to developing an understanding of the complete picture of homelessness and housing instability in Jackson. Feedback was provided via personal conversations, email correspondence, and survey feedback. Ancillary feedback was also paired with corresponding data, received from a plethora of local agencies. Again, these groups are best-positioned to provide accurate, up-to-date details on living conditions, personal struggles, agency needs, and funding/programming gaps. Data on homeless numbers, social services provided, and overall gaps in

housing numbers related to income levels helped to inform decisions regarding funding recommendations within this Allocation Plan.

The Guidehouse “Housing Strategy and Policy Framework” provided a comprehensive and data-driven analysis of Jackson’s current and future housing needs. The data within that report helped fill-in any gaps in our research, and provided both a strong current aspect and future projection of housing needs in Jackson. Additional insights from City staff were also taken into account, as City of Jackson staff work with local agencies/service providers on a daily basis and have an intimate understanding of the challenges they face.

Analyzing all data presented, and taking into account all additional information as stated above, the City of Jackson is confident the HOME-ARP Allocation Plan will best-utilize the allocated HOME-ARP funds while providing much-needed relief to City residents from numerous qualifying populations.

HOME-ARP Activities

Method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients, and/or contractors:

- Development of Affordable Rental Housing (construction): The City of Jackson will solicit proposals (utilizing a “Request for Proposals (RFP) process) from developers and local agencies interested in building affordable rental housing. The City of Jackson will select the most qualified developer(s) with the highest likelihood of success implementing this program in the appropriate timeline and budget.
- Preservation of Affordable Rental Housing (rehabilitation): The City of Jackson will solicit proposals from local landlords and/or service providers interested in rehabilitating current affordable rental housing. The City of Jackson will select the most qualified provider(s) with the highest likelihood of success implementing this program in the appropriate timeline and budget.
- Supportive Services: The City of Jackson will solicit proposals from local service providers interested in providing supportive services, and will look for agencies with experience in this area and with the management of other federal grant dollars. The City of Jackson will select the most qualified service provider(s) with the highest likelihood of success implementing this program in the appropriate timeline and budget.

Will the PJ administer funds directly?

While the City of Jackson is ultimately responsible for the proper use and administration of HOME-ARP, funds for the development of affordable rental housing and supportive services will be sub-granted to an appropriate developer or agency to carry out this activity.

If any portion of the PJ’s HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD’s acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ’s

entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

Not applicable. The City of Jackson did not utilize a subrecipient or contractor before the HOME-ARP Allocation Plan was accepted.

Use of HOME-ARP Funding

Activity	Funding Amount	Pct of Grant	Statutory Limit
Supportive Services	\$150,000		
Acquisition/Development of Non-Congregate Shelters	\$0.00		
Tenant Based Rental Assistance (TBRA)	\$0.00		
Development of Affordable Rental Housing	\$816,789		
Non-Profit Operating	\$0.00		5%
Non-Profit Capacity Building	\$0.00		5%
Administration and Planning	\$170,609	15%	15%
Total HOME-ARP Allocation	\$1,137,398		

How will the PJ distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis

Affordable rental housing has been identified as a clear need in our needs assessment/gap analysis. The allocation of \$816,789 will go directly to the preservation of existing affordable rental units, and the construction of new affordable units.

Supportive services has been identified as a clear need in our needs assessment/gap analysis, with the ability to help prevent episodes of homelessness and support the homeless in becoming housed. The allocation of \$150,000 will be reserved for emerging needs for qualifying populations, who without that assistance would be at serious risk of homelessness.

Characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis, and the rationale for the plan to fund eligible activities

Approximately 50% of the City's total housing stock was built before 1940, when Jackson was prosperous and growing rapidly; these homes are now no less than 80 years old. During the next three (3) decades (between 1940 and 1969), the City continued to grow at a slightly slower pace when manufacturing jobs were plentiful; 35% of the City's housing stock was built during these years. The creation of new housing in the City continued to decrease at the end of the 20th century and into the early 21st century. As noted previously, while the cost of living, including housing costs, were climbing, Jackson's median household income decreased over 10% in the past decade. At the same time, the number of persons living below the federal poverty level has nearly doubled. The 2019 Low-Mod Income Summary Data (LMISD) indicates that 62% of City residents are low-income. The City exhibits extremes of this percentage depending on where a person lives, from a low of 22.9% low-income

residents in the area bordered by Michigan Avenue–West Avenue–Carlton Boulevard–Brown Street, to a high of 92.8% low-income residents in the area principally bordered by Franklin Streets–Cooper Street–Moore Street (also includes the Martin Luther King Center and Chalet Terrace area)–Chittock/Mechanic Streets.

Due to the age of the majority of homes in the City of Jackson, and the lack of resident/landlord investment in property improvements, Jackson’s housing stock has suffered from years of deferred maintenance. This is especially true amongst houses purchased as investment property. The City has invested several million dollars in recent years to demolish foreclosed, vacant, abandoned, condemned, and dilapidated housing. As such, the City currently owns roughly 600 buildable, residential lots. Conversations are ongoing with various small and large-scale developers to create in-fill housing on City-owned lots for rental and/or owner-occupied homes, in an effort to increase the supply of affordable housing in Jackson.

A key recommendation from the Guidehouse “Housing Strategy and Policy Framework” report included the construction of 1,500 new units and the preservation of 3,000 existing unit over the next ten years (total of 4,500 units). The allocations proposed in this plan provide relief to both of these areas of need. Feedback from the Continuum of Care member survey highlighted numerous service delivery gaps, including rent affordability, the lack of affordable and adequate rental housing, and the lack of affordable 1 and 2-bedroom units. The allocations proposed in this plan provide relief to all three of these areas of need.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

Development of Affordable Rental Housing

- Estimated number of rental units preserved: 10
- Estimated number of rental units produced: 4

Supportive Services

- Anticipated assistance per household: \$2,000
- Estimated number of households receiving benefits: 75

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ’s priority needs:

The City Jackson’s goal is to develop up to 4 affordable rental homes, at an average cost of \$175,000 per unit. Rising rent and limited availability of units causes increased instability among cost-burdened and low-income renters (including those at risk of homelessness). Among those experiencing homelessness, the lack of affordable rental units often creates a bottleneck in the availability of stable housing options, creating longer episodes of homelessness and leading to fewer overall households becoming housed in stable situations. Adding affordable rental housing to Jackson’s current housing stock will address this priority in two ways (short and long-term):

- Create addition units to reduce burden and provide affordable options for renters (short-term)

- Spur additional developer investment in Jackson for future affordable housing construction (long-term)

Preferences

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

No preference will be given

Limitations in a HOME-ARP Rental Housing or NCS Project

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in Section IV.A of the Notice:

The City of Jackson does not intend to use HOME-ARP funds to refinance existing debt.