

JACKSON

Founded 1829



Before



After

2021 – 2022 Consolidated Annual Performance and Evaluation Report (CAPER)

Community Development Department



CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The Consolidated Annual Performance and Evaluation Report (CAPER) describes the results of activities completed by the City of Jackson to accomplish the outcomes identified in the 2021-2022 Annual Action Plan for the period of July 1, 2021 through June 20, 2022. This is the second CAPER submitted in association with the 2020-2024 Five-Year Consolidated plan. Some goals in the Annual Action Plan take more than one year to achieve and are ongoing; however, all funded activities continue to further the Consolidated Plan's priorities of providing decent, safe, sanitary, and affordable housing; reducing blight through code enforcement or demolition; and improving the suitable living environment in distressed neighborhoods by sustaining public infrastructure and facilities.

As an entitlement community, the City of Jackson received two CDBG-CV formula allocations from the CARES Act totaling \$945,445. At the onset, the Jackson City Council initiated a Homeless Prevention Program through its subgrantee, Community Action Agency (CAA) to utilize over three categories: Eviction Protection, Water Shutoff Prevention, and Foreclosure Prevention. The Homeless Prevention project was initially successful when first implemented in mid-2020; however, as additional federal and state resources funneled into Jackson, the CDBG-CV funds became less critical as a supporting means to meet the immediate needs of the community. City staff attempted to partner with other entities in the community, such as the Jackson Public School system to develop and implement a family counseling program to address the negative mental and behavioral effects virtual learning and isolation from friends had on low-income students. Unfortunately, attempts to redirect the use of CDBG-CV funds was either met with disinterest or, after planning a viable use, other funds were made available that would duplicate the service so plans for CDBG-CV were abandoned.

Under CARES Act rules and regulations for the use of CDBG-CV funds, 80% (or \$756,356) must be spent by the end of May 2023. It became obvious two years out that the threshold would not be met if funding was left the way it was. As mentioned above, City staff attempted to find creative ways to respond to the pandemic, especially as it affected low income students and families. Unfortunately, those ideas never came to fruition. As HUD published additional guidance, it became apparent a good project to support that would not create a duplication of benefits was to undertake public facility improvements.

Funding was reallocated to provide upgrades to the Loomis Park Boos Center HVAC system. The Boos Center was originally constructed in 1973 and the current system was inadequate as mechanical systems have significantly improved over the same 50 year period. Combined with decayed and undersized duct work, the system does not provide the proper heating and air flow a recreation center needs. Upgrading the entire system, to include permanent air conditioning, will greatly improve energy efficiency and climate control, as well as air quality, which will aid in the prevention of the spread of COVID-19. Upgrades to the HVAC system were near completion at the end of the 2021-2022 project year.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
CHDO - New Construction	Affordable Housing	HOME: \$	Homeowner Housing Added	Household Housing Unit	5	0	0.00%			
Code Enforcement (legal)	Non-Housing Community Development	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	500	431	86.20%	300	227	75.67%
Homebuyer Rehabilitation	Affordable Housing		Homeowner Housing Added	Household Housing Unit	5	0	0.00%			

Homeowner Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	75	29	38.67%	0	17	
Public Facilities/Infrastructure	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3180	6495	204.25%	3180	6495	204.25%
Residential Demolition	Clearance and Demolition	CDBG: \$	Buildings Demolished	Buildings	100	32	32.00%	10	12	120.00%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

As noted in the 5-Year Consolidated Plan, public facilities and infrastructure improvements are solely the responsibility of the City of Jackson to maintain. Diminishing revenue streams and increasing costs to provide services the community expects from its government deferred the maintenance of streets and parks. Public infrastructure projects completed during the 2021-2022 program year included reconstruction of the pavement and curbs, replaced water mains and lead service lines where needed at Cooley Place: Morrell Street to Biddle Street and Biddle Street: Mechanic Street to South Martin Luther King Jr. Drive. Preliminary design work was completed for Perrine and Burr Streets, however, due to supply chain delays, the project was postponed and is not expected to begin until the third quarter of the 2022-2023 program year. Rehabilitation of the Boos Center based on priority needs identified through an architectural/engineering assessment, and replacement of the playground outside the Boos Center to improve the safety and accessibility for neighborhood children was delayed due to additional SHPO required done due to unanticipated and significant ground disturbing activities. A phase I architectural survey was completed and approval to proceed was received from SHPO on 6-9-2022. The project will continue to move forward into the 2022-2023 project year.

In August 2020, City Council approved the addition of a partial rehabilitation option to replace a home’s major components that are nearing the

end of their useful life but were not yet eligible as an emergency hazard. By adding this option, the City is able to help additional homeowners replace the more expensive repairs a home needs, allowing homeowners to use their limited maintenance budgets for more cosmetic improvements. The City also reduced the amount of time a lien was placed on a property from 10 or 20 years to five (5) to 10 years, depending on the level of rehabilitation offered. Seventeen (17) low-income homeowner properties received emergency hazard or major component improvements during the program year.

Demolition of foreclosed, vacant, or abandoned residential properties continues to be a measure used by the City to remove blighting effects in residential neighborhoods primarily comprised of low income households. With a change in City leadership, more homes acquired through tax reversion are being sold to responsible homebuyers or real estate investors, reducing the number of properties slated for demolition and providing more affordable housing options in the community. However, some tax reverted properties have suffered years of neglect and deferred maintenance and still require removal through demolition. Twelve (12) demolitions were completed during the 2021-2022 program year. Being an activity under the Slum/Blight Spot Basis National Objective, staff closely tracks the 30% cap which limits the number of demolition projects that can be undertaken during a program year.

The following Homeless Prevention accomplishments have been achieved through the use of CDBG-CV funds:

- 45 households (126 individuals) kept their water service through payment of delinquent water bills
- 1 household (1 individual) remained housed by avoiding foreclosure

Goals and Objectives Narrative Cont

The HOME-funded Partnership Park rehabilitation project subgranted to CAA was changed from a homebuyer to a homeowner activity in April 2022. The activity's intended beneficiaries, project sites, and outcomes did not change; however, the timing of when rehabilitation would take place did. The original homebuyer rehabilitation plan created barriers to financing for the homebuyer because it would establish second and third mortgages. Lenders balked with this type of financing structure and, with mortgage interest rates rising, the earlier a loan could close with a homebuyer the more affordable the house remained. On September 21, 2021, the City of Jackson was notified that it was eligible to receive \$1,137,398 in HOME Investment Partnerships Program's American Rescue Plan (HOME-ARP) from the U.S. Department of Housing and Urban Development to provide supplemental funding for homelessness assistance and supportive services through several eligible activities. In

order to receive funding, the City must submit an action plan outlining how funds will be distributed for use. The process of developing an action plan for HOME-ARP funds was delayed due to City staff medical leave, staffing changes, and the hiring of a new staff person. Preliminary consultation work with local agencies was conducted with little response from local organizations of their needs. The City decided to postpone the development of the action plan due to the numerous housing studies currently being conducted in the Jackson community. The Jackson Housing Commission / City of Jackson received a Choice Neighborhoods Planning Grant and are conducting a housing needs assessment for the Choice Neighborhood encompassing downtown and area neighborhoods, especially south of downtown. Additionally, the City of Jackson hired Zimmerman/Volk to conduct a housing needs assessment and a target market survey comprising the entire City. The City of Jackson also recently created an Affordable Housing Development Board that just started in April. They received about \$3 million in ARPA funding from the City to initiate complementary housing programs and services. Although they are just starting out, the City has also engaged its ARPA consultant, Guidehouse, to help through the initial setup, including coordinating all the various plans and needs assessments currently underway (drafts of which will be soon available). They are working closely with Collabo (Jackson Housing Commission's consultant for the CN grant) and Zimmerman/Volk to pull everything together then to provide an "interpretative" document along with other consultations/assessments they will be performing. When completed, the data obtained from these projects should lead to a well-coordinated use of the various funds available and an assessment of how best to develop the HOME-ARP action plan.

Assessment of jurisdictions use of funds cont.

Due to the unprecedented amount of federal and state funds made available in the Jackson community, other resources became accessible to prevent homelessness through similar means. It became clear the City would not meet its threshold of expending 80% of its CDBG-CV funds by the end of May 2023 providing just homelessness prevention funding. As additional guidance became available from HUD in 2021, the City created a project to upgrade the HVAC system at the Boos Community Center at Loomis Park as it was severely outdated, inefficient, and does not have the capacity to provide proper air transfer, heating, and cooling. The Boos Center offers a variety of classes and activities for all age groups, from tumbling classes for 2 and 3 year olds to "Active Aging" programs geared for seniors and also serves as a neighborhood warming center during winter months and a cooling center during summer months using portable air conditioners. The City began discussions with Community Action Agency (CAA) to recapture unused CDBG-CV funds from the Homeless Prevention activities at least a year in advance. On June 15, 2022, over \$300,000 was recaptured three (3) months early which is in the process of supporting another public facilities and infrastructure project at Loomis Park where the Boos Center is located. This new project will be to expand the trail system on the east side of the park with social distancing a key factor in its development. This trail will also contain socially distanced fitness pods to ensure any subsequent

outbreaks of COVID-19 or similar viral pandemics does not interfere with the area's residents' desire for safe, outdoor fitness activities.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG	HOME
White	24	0
Black or African American	16	0
Asian	0	0
American Indian or American Native	0	0
Native Hawaiian or Other Pacific Islander	0	0
Total	40	0
Hispanic	6	0
Not Hispanic	32	0

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

In early 2017, the Jackson City Council adopted a Non-Discrimination Ordinance, found at Chapter 15, Article III of the City of Jackson Code of Ordinances. This ordinance states in part: It is the intent of the City of Jackson that no person be denied the equal protection of the laws; nor shall any person be denied the enjoyment of his or her civil rights or be discriminated against because of their actual or perceived race, color, religion, national origin, sex, age, height, weight, marital status, physical or mental disability, family status, sexual orientation, or gender identity.

Of the seventeen (17) households assisted during program year 2021-2022, a total of 40 persons benefited from the use of CDBG or HOME funds. Other notable information includes, but is not limited to, the following:

- Total of eight (8) female heads of household
- Total of (16) extremely low income, (11) low income, and (13) moderate income
- Total of fourteen (14) minor children
- Eight (8) disabled persons

Ten (10) elderly persons

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,367,930	133,724
HOME	public - federal	334,329	476,699

Table 3 - Resources Made Available

Narrative

PR26 data was delayed due to an IDIS/BOSMAC Report malfunction which had to be worked out with HUD to reconcile the IDIS/City accounts.

Approximately 25% of the City's total CDBG-CV allocation has been expended under the Homeless Prevention initiative. As additional state and federal resources flowed into the community to fund similar activities as this project's initial focus, the ability to use CDBG-CV was hindered due to the "no duplication of benefits" requirements. To meet the timeliness requirements included with the CARES Act, City staff recaptured over \$300,000 in homeless prevention funds three (3) months before the expiration of the written agreement with Community Action Agency to put toward projects that should be completed by May 2023.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
East of S Martin Luther King Jr Dr	10	32	
West of Henry Ford Allegiance Health	10	3.25	
West of S Martin Luther King Jr Dr	10	2.3	

Table 4 – Identify the geographic distribution and location of investments

Narrative

This being the second year of the 5-Year Consolidated Plan, progress has been made in increasing CDBG investment in the three target areas since the 2020-2021 project year. Challenges still remain due to interruptions related to supply chain delays. The amount of CDBG invested in the three (3) locally-designated target areas identified above is unbalanced, however movement towards spreading investment more equally between the three target areas has occurred. CDBG funding amounts decreased from 45.3% to 31.9% in Target Area 1. Projects funded include the demolition of three (3) residential properties to decrease blight in the area, three (3) homes receiving new roofs and two (2)

street reconstructions. The investment increased in Target Area 1 from 1.5% to 3.25% with preliminary work started on street reconstruction. Investment also increased from 0% to 2.3% in Target Area 3 with two (2) homes receiving new roofs and a boiler repair. In addition to CDBG investments, Target Area 3 received HOME funds in the development of two (2) new single family homes developed by the City's CHDO, the Greater Jackson Habitat for Humanity. Planning continues to be undertaken by the City's Engineering and rehabilitation staff to identify future projects to expand investment in the underserved target areas.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

Street reconstruction projects are selected in areas that also need water and/or sewer or other utility upgrades. The City of Jackson deeded a vacant lot to the Greater Jackson Habitat for Humanity to further its new construction project, DeLand Pointe, as the City's CHDO.

The City of Jackson is exempt from providing 25% match through the HOME program due to its high poverty level, low per capita income, and fiscal distress.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	0
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	0
4. Match liability for current Federal fiscal year	0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	0

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
Not applicable	0	0	0	0	0	0	0	0

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
74,154	11,544	37,929	0	47,769

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	0	0	0			
Number	0	0	0			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0	0			
Businesses Displaced		0	0			
Nonprofit Organizations Displaced		0	0			
Households Temporarily Relocated, not Displaced		0	0			
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	0	0

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	0	17
Number of households supported through Acquisition of Existing Units	0	0
Total	0	17

Table 12 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The rehabilitation policies and procedures manual, last updated in 2014, underwent significant changes early in the 2020-2021 program year. Although full rehabilitation remains in the manual, its use was suspended due to the cost to fully rehabilitate the City's aged housing stock becoming cost prohibitive. To help low-income homeowners remain housed and make that housing affordable to them, the incorporation of a "major components" program was added to the manual. This program allows the City to provide rehabilitation assistance to a homeowner to replace aged major systems, such as a roof,

furnace, water heater, etc., before they become an emergency situation. The emergency hazard program remains intact and addresses issues that have escalated to an emergency situation, such as a leaking roof or a non-functioning furnace during the winter months.

Over the years, the City’s rehabilitation program has been able to help fewer and fewer families due to increasing building material costs and level of repairs needed. Instead of trying to correct all code violations which may exist in a home, the focus has shifted to assist with the most expensive items a homeowner may face at any given time. Adding the ability to correct a home’s major systems and components that are toward the end of their useful life before they become an emergency situation will save homeowners thousands of dollars.

At the beginning of the 2021 fiscal year, over 500 postcards were mailed to homeowners in the City’s three local target areas informing them about the rehabilitation programs offered. The response to that targeted mailing has produced several new applications for assistance. This program year, of the 17 projects provided rehabilitation assistance, five (5) were in one of the three local target areas. Further, the City received thirty-one (31) additional applications in one of the three local target areas. Of those, ten (10) were denied for not meeting program eligibility requirements, twenty-three (23) were pending the receipt of supporting documents to complete their application for eligibility review, seven (7) are in financial review, pending receipt of additional funding and one (1) was withdrawn. Funds dedicated to the rehabilitation of emergency hazards and major component repairs were depleted prior to the end of the fiscal year and a waiting list of applicants was started for future projects as funds are available.

Discuss how these outcomes will impact future annual action plans.

Offering rehabilitation loans for homeowners facing emergency hazards or major components nearing the end of their useful life will continue as a high priority. Due to the overwhelming response early in the 2021 fiscal year, additional funds may be needed from projects that come in under budget or program income to offer the loans.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	7	0
Low-income	4	0
Moderate-income	6	0
Total	17	0

Table 13 – Number of Households Served

Narrative Information

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

City of Jackson staff does not specifically reach out to homeless persons and assess their individual needs. However, staff does participate with the Jackson County Continuum of Care (CoC) and, in the past, has served as a co-chairperson to the Board. The CoC is comprised of various community service organizations and governmental entities that meet monthly to discuss emerging needs and strategically plan to address those needs, be it legal, social, practical, or others. On January 27, 2021, members of the CoC participated in the annual Point in Time (PIT) count to document the number of sheltered and unsheltered homeless persons residing in the community. The CoC provides funding to community service providers to screen and evaluate those living in a shelter or are otherwise homeless to assess an individual's or family's acuity. The screening tool is applied across multiple components then prioritizes who to serve next and why, while concurrently identifying areas in the person/family's life where support is most likely necessary to avoid housing instability.

A designated Housing Assessment and Resource Agency (HARA) is the primary access point for all homeless persons or those at risk of becoming homeless who are also able to be initially assessed through other avenues, such as emergency shelters, domestic violence shelters, veterans' providers, etc. The CoC uses the same assessment tool at all access points with criteria modifications for specific subpopulations, namely the Service Prioritization Decision Assistance Tool (SPDAT). The Tool determines each household's housing and service needs, but also prioritizes households for housing program referrals for permanent supportive housing, rapid re-housing, or supportive services only.

Addressing the emergency shelter and transitional housing needs of homeless persons

The 2021 PIT count performed by the CoC indicated 119 homeless individuals were documented, an increase of approximately 19% from 2020. Of those, all 119 were reported as sheltered. Five (5) individuals were considered chronically homeless, a slight decrease from 2020, defined as a single person (or head of household) who experienced four (4) homeless episodes during the previous 12 months; however, all of those persons were sheltered at the time the count was conducted.

The 2021 Housing Inventory Count (HIC) reports 126 year-round beds in shelters for those experiencing homelessness. Eighty (80) beds are reserved for households without children and fifty-nine (59) beds are available for households with children. An additional five (5) beds are available during overflow situations. In addition, the Rapid Re-Housing program reports twenty-five (25) year-round beds; Permanent Supportive Housing supplies seventy-eight (78) year-round beds.

The Housing Assessment Resource Agency (HARA) screens clients to determine the appropriate housing interventions. Through the "no wrong door" approach, though, the screening can be accomplished by another agency and coordinated through the HARA. The assessment tool quickly evaluates the health and social needs of those experiencing, or are at risk of, homelessness to help identify the best type of support and housing intervention by relying on three (3) categories of recommendation:

- *Permanent Supportive Housing* - individuals or families who need permanent housing with ongoing access to services and case management to remain stably housed;
- *Rapid Re-Housing* - individuals or families who are likely to achieve housing stability over a short period of time through a medium or short term rent subsidy and access to support services;
- *Diversion* - individuals or families who do not require intensive supports but may still benefit from access to affordable housing with some light touch services. In these cases, the assessment tool recommends affordable or subsidized housing but no financial assistance.

The Coronavirus Aid, Relief, and Economic Security (CARES) Act provided an influx of Emergency Shelter and CoC grant money, among other CARES Act funding, to the Jackson community to address the needs in preventing, preparing for, and responding to COVID-19.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Members of the CoC constantly evaluate and report gaps in services for Jackson's homeless population. The CoC operates a Coordinated Entry process that standardizes the way individuals and families at risk of homelessness are assessed for, and referred to, the housing and services they need for housing stability. The United Way of Jackson County also funds Central Michigan 2-1-1 which can connect persons in need with health and human resources available in the area simply by dialing 211 on their phone. The United Way also facilitates a monthly Emergency Needs Coalition meeting allowing various community service and faith based organizations to come together to share resources they have available and to problem solve.

The onset of COVID-19 provided great insight into where gaps truly exist in providing key services to the Jackson community. Instead of assuming where these discrepancies existed from anecdotal reporting, the reality and priority of unmet needs became known, and are continuing to materialize, as Jackson deals with the real-time existence and emergence. For its part, the City of Jackson obligated a significant portion of its CDBG-CV grant toward Homeless Prevention activities which included Foreclosure Prevention, Water Shutoff Protection, and Eviction Prevention. As additional state and federal resources flowed into the community to fund similar activities as this project's initial focus, the ability to

use CDBG-CV was hindered due to the “no duplication of benefits” requirements. To meet the timeliness requirements included with the CARES Act, City staff recaptured over \$300,000 in homeless prevention funds three (3) months before the expiration of the written agreement with Community Action Agency to put toward projects that should be completed by May 2023.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

In addition to operating a Coordinated Entry process, the CoC also adopted the Housing First model which prioritizes housing to people experiencing homelessness. By attending to a person's critical needs of food and shelter first, it is believed they will then be able to focus on other needs such as getting a job, learning how to budget properly, or attending to any substance abuse issues. Housing First does not require a person experiencing homelessness to address all of their problems or attend a variety of service programs before receiving assistance. Once housing is stabilized, individuals are offered supportive services but are not required to participate.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The Jackson Housing Commission (JHC) has served as the City's Public Housing Authority (PHA) for over 60 years and also services all of Jackson County. JHC is considered a medium-sized agency providing 500 public housing units, 40 scattered-site single family homes, and up to 475 Housing Choice Vouchers (HCV).

In early 2020, the JHC applied to the HUD Rental Assistance Demonstration (RAD) program and received approved Commitments to enter into a Housing Assistance Payment (CHAP) for its three properties of Reed Manor, Chalet Terrace, and Shahan-Blackstone North. Congress authorized RAD in 2012 to preserve affordable housing by allowing Public Housing Agencies (PHAs) to convert from their original source of HUD funding to project-based section 8 contracts or project-based vouchers.

The City will continue to work collaboratively with the JHC as needed through the RAD conversion, which changes the type of federal housing assistance from public housing (Section 9) to project-based vouchers (Section 8). The RAD conversion also allows the JHC to obtain other public or private funding sources to repair and improve their properties. Once the RAD conversion is fully implemented, the JHC plans to apply for Low-Income Housing Tax Credits (LIHTC) through the State of Michigan.

In July 2021, the JHC and City successfully partnered in a Choice Neighborhoods Planning grant application, which was awarded in November 2021. The Choice Neighborhoods program leverages significant public and private dollars to support locally driven strategies that address struggling neighborhoods with severely distressed public housing and/or HUD-assisted housing through a comprehensive approach to neighborhood transformation. Local leaders, residents, and other stakeholders, such as public housing agencies, cities, schools, police, business owners, nonprofits, and private developers, come together to create and implement a plan that revitalizes distressed HUD housing and addresses the challenges in the surrounding neighborhood.

With the first year of planning wrapping up, the JHC and City participate in bi-weekly planning team calls with Collabo, the consultant engaged by JHC to guide it through the planning process. A steering committee has been formed with numerous members representing non-profit entities, faith-based organizations, schools, local police, local residents and others. Several community meetings have taken place within the Choice Neighborhood boundaries to introduce the concept of Choice Neighborhoods and what it could mean for the selected area. JHC staff are available at the community meetings to discuss ideas and assist with survey questions. A trailer was purchased and decorated by JHC to use as a mobile headquarters; free little libraries have also been erected in the Choice Neighborhood area as a promotional and informational tool.

Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

Residents of the three public housing complexes continue to be actively engaged with upcoming RAD conversions at Shahan-Blackstone North and Chalet Terrace. In addition, Reed Manor residents have been especially busy assisting with the Choice Neighborhood planning to ensure future redevelopment will meet their housing visions with the amenities most needed. Reed Manor residents identified kitchens and bathrooms as being the areas that are most in need of upgrading. In terms of preferred indoor community spaces, the top choices were for an upgraded laundry room, a gym or fitness center, and a game room. Preferred outdoor site features included new benches, barbecue areas, and security features, as well as more convenient parking. For the larger neighborhood, residents identified the need for additional houses of worship, as well as a bakery and pharmacy within walking distance.

Actions taken to provide assistance to troubled PHAs

The JHC is not a troubled PHA.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The City of Jackson does not intentionally create policies, codes, or rules that produce barriers to affordable housing, but rather faces the same realities experienced by most municipalities – increasing construction costs, complexity of financing for larger projects, and an affordability gap between incomes and housing costs. Likewise, most policies, ordinances, and/or codes are established to maintain compliance with local, state, and federal guidelines or for health and safety reasons.

Conversations with local housing providers reveals affordable housing 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:

- Landlords unaware of the laws governing rental housing, including Fair Housing laws and prohibited discriminatory practices.
- Tenants do not realize 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 utilities.
- Inability to obtain utilities in tenant's name.
- Limited public transportation options.
- Poor credit history, especially for youth just out of college, persons facing unexpected life issues, or ruined as part of a domestic violence situation.
- Rejection of service animals in the unit.
- Refusal to accept Housing Choice Vouchers or charging rents that don't qualify for fair market rent.
- People who are routinely discriminated against often don't notice or identify discrimination. If discrimination is suspected, the tenants are often more interested in finding housing to meet their immediate need rather than going through a lengthy appeal process.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

City staff continues to maintain its network of state and local public agencies and non-profit service providers and facilitates meetings when appropriate. The use of CDBG or HOME funds to meet underserved needs is subject to fluctuations in annual funding. The CARES Act and subsequent federal and state subsidies provided unprecedented levels of funding in the community to address a variety of urgent needs from keeping families housed to supporting small businesses.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

According to the Michigan Department of Health and Human Services (MDHHS), 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 14 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 90% of all housing was constructed prior to 1978.

Housing built prior to 1978 (when federal law banned the use of lead-based paint in residential housing) is considered to be at risk of containing some amount of lead-based paint. The amount of lead pigment in the paint increases with the age of the housing. Housing built prior to 1950 remains a significant concern for lead poisoning as 1950 is often recognized as the "threshold" to lower levels of lead-based paint. Before 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 77% 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. Rental properties make up a large percentage of the City's housing units. If units containing lead-based paint are not properly maintained, the risk of young children coming into contact with lead-paint hazards will continue to climb.

Inspections of non-owner occupied housing units assess deteriorated paint and are cited as a violation and ordered repaired before a certificate of compliance is issued to the property owner. Any rehabilitation activities that may disturb painted surfaces in a home receive a combination lead paint inspection/risk assessment and, if hazards exist, treated according to the Lead Safe Housing Rule. All actions taken to remediate an identified lead hazard must be approved through a lead clearance examination.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The City of Jackson has neither the facilities nor resources 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 make housing affordable to its low- to moderate-income homeowners:

- *Rehabilitation* – Unfortunately, rising construction costs led to the suspension of offering low-income homeowners a full rehabilitation to correct all code violations. However, up to \$25,000 is available through a five year, zero-interest, deferred loan with a partial low repayment factor to correct emergency hazards or replace a home's major components nearing the end of their useful life. By assisting homeowners address the major aspects of home ownership maintenance needs, more households benefit from the City's limited CDBG funds.
- *Homebuyer New Construction* – currently under development through the City's CHDO, the

Greater Jackson Habitat for Humanity. Two properties have been constructed as of the writing of this report and are in the process of being sold.

- *Homeowner Rehabilitation* - The HOME-funded Partnership Park rehabilitation project subgranted to CAA was changed from a homebuyer to a homeowner activity in April 2022. The activity's intended beneficiaries, project sites, and outcomes did not change; however, the timing of when rehabilitation would take place did. The original homebuyer rehabilitation plan created barriers to financing for the homebuyer because it would establish second and third mortgages. Lenders balked with this type of financing structure and, with mortgage interest rates rising, the earlier a loan could close with a homebuyer the more affordable the house remained. Two (2) of the sixteen (6) homes sold shortly after the end of the 2021-2022 program year.

In addition, the City ensures tenants have decent, safe, and sanitary living conditions through its Housing Code Enforcement (HCE) program (not federally funded). The HCE program also improves neighborhood living conditions through enforcement of various blight ordinances, such as garbage, inoperable vehicles, noxious weeds and trees, and zoning violations.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

City staff actively participates with the CoC and other collaborative meetings as may be necessary to remain aware of the community's health and emerging needs. Close monitoring of projects implemented by other City departments ensures compliance with federal rules and regulations and the timely expenditure of CDBG funds. The Greater Jackson Habitat for Humanity receives technical assistance and guidance by various City staff as its new housing construction project proceeds.

The onset of COVID-19 made the community keenly aware of the need to develop a stronger institutional structure. As the seriousness of the novel coronavirus became evident to Michigan communities, the Mayor and City Manager worked closely with community stakeholders. Among partners were local health care leaders such as Henry Ford Allegiance Health, the Jackson County Health Department, the Center for Family Health, the United Way of Jackson County, Community Action Agency, and others to coordinate local non-profits' efforts to address the emerging needs of the community.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

Once a year, the Jackson City Council holds a public hearing to specifically gain input from the community on general housing and community development needs prior to the start of the annual funding process. Comments received during the public hearing are considered by the City Council and incorporated into the Annual Action Plan and/or Consolidated Plan. City staff actively participates with the CoC; members of the CoC represent various public and non-profit agencies in Jackson that provide mainstream and specialized services to homeless, non-homeless special needs, and general populations

and subpopulations. Discussion at monthly CoC meetings always includes identification of emerging needs or gaps in service that need attention.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The purpose of an Analysis of Impediments to Fair Housing is to determine if possible discrimination to housing choice exists in the community within the seven (7) federally protected classes of race, religion, sex, color, national origin, disability, or familial status. In early 2017, the Jackson City Council adopted a non-discrimination ordinance and recently updated Jackson's Fair Housing Ordinance, found at Chapter 14, Article IV of the City of Jackson Code of Ordinances to include several additional classes protected from housing discrimination as follows: religion, race, color, national origin, ancestry, age, sex, sexual orientation, gender identity, familial status, marital status, source of income, height, weight, religious or political opinion, union affiliation, and physical or mental handicap.

While the City's Fair Housing ordinance includes protected classes beyond those identified at the federal level, local housing advocates report discriminatory practices are often not pursued. Tenants are usually in "survival mode" and are more interested in obtaining housing than proceeding with legal action. The process is intimidating, takes time, and is not clear cut. Oftentimes a discriminatory practice may be the underlying issue but housing is denied for minor legitimate reasons making prosecution especially difficult.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Monitoring is completed mainly through desk reviews. With City departments overseeing funded projects, access to immediate review and consultation is easily achieved. Employees with many years of experience managing federally-funded projects oversee these activities. Responsible staff has found few if any issues to address.

All expenditures of CDBG/HOME funds are thoroughly reviewed for eligibility and adequate documentation. Once approved for compliance, invoices are submitted for payment where they are further evaluated before processing. An independent auditor performs a single audit of the City's federal grants annually.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

Jackson encourages all citizens, and especially those for whom activities are targeted, to participate in the planning and utilization of CDBG and HOME funds. The City of Jackson also invites active participation by local and regional institutions, the Jackson County Continuum of Care, and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations) in developing and implementing the Consolidated Plan and Annual Action Plan. The ability for citizens to participate in community development goes beyond the formal processes described in the Citizen Participation Plan through day-to-day involvement and interaction with City staff, formal boards, planning committees, ad hoc advisory groups, and the Mayor and City Council.

Notice of upcoming public hearings and open comment periods is published in local newspapers at least 10 days in advance. Information is also posted on the City's website and on its social media platforms. The Consolidated Plan and Annual Action Plans provide a 30-day public comment period while the Consolidated Annual Performance and Evaluation Report is 15 days. Comments are taken orally or in

writing, are considered by the Jackson City Council, and incorporated into the document to which they pertain.

A Public Hearing to obtain citizen comments regarding the FY 2021 program performance was held during the Jackson City Council's September 27, 2022 regular meeting. No comments were received.



Jackson Citizen Patriot

LEGAL AFFIDAVIT

AD#: 0010428141 Total \$158.05

State of Michigan,) ss
County of Jackson)

Nancy Block being duly sworn, deposes that he/she is principal clerk of MLive Media Group; that Jackson Citizen Patriot is a public newspaper published in the city of Jackson, with general circulation in Jackson county, and this notice is an accurate and true copy of this notice as printed in said newspaper, was printed and published in the regular edition and issue of said newspaper on the following date(s):

Jackson Citizen Patriot 09/03/2022

Nancy Block
Principal Clerk of the Publisher

Sworn to and subscribed before me this 29th day of September 2022

Teasha R Payne
Notary Public

TEASHA R. PAYNE
NOTARY PUBLIC, STATE OF MI
COUNTY OF MECOSTA
COMMISSION EXP FEB 24 2026
ACTING IN COUNTY OF Kent

Public Notice

The City of Jackson is inviting citizens to attend a Public Hearing on Tuesday, September 27, 2022 at 6:30 p.m. The hearing will be held in the City Council Chambers on the second floor of City Hall, 161 West Michigan Avenue.

The purpose of the Public Hearing is to invite citizens to comment on the City of Jackson's progress in accomplishing the goals and objectives in its Consolidated Plan, including provisions for affordable housing and the Community Development Block Grant (CDBG) and HOME Programs for the period of July 1, 2021 through June 30, 2022. At the time of the Public Hearing, the Jackson City Council will be reviewing the City's Consolidated Annual Performance and Evaluation Report (CAPER) and accepting comments from the public. After the Public Hearing, the CAPER will be submitted to the Department of Housing and Urban Development.

Beginning September 9, 2022, a copy of the CAPER can be reviewed at the following locations:

City Hall 161 W Michigan Avenue, Jackson 1st Floor - City Clerk's Office	Shahan-Blackstone North Apts. 109 Shahan Drive, Jackson
3rd Floor - Community Development Department	Reed Manor 301 Steward Avenue, Jackson
Jackson District Library Carnegie Branch 224 W Michigan Avenue, Jackson	Chalet Terrace 316 Barbary Drive, Jackson
Community Action Agency 1214 Greenwood Ave, Jackson	

An electronic copy of the CAPER can also be viewed on the City's website at:
<http://www.cityofjackson.org/332/GrantReports>

For general information concerning the Public Hearing, please contact Lena Gray, Grant Administrator, at (517) 768-6461 or leave comment at lgray@cityofjackson.org.

Affidavit of Public Hearing MLive

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

Staff does not foresee a change in Jackson’s program objectives, which include housing rehabilitation, new or converted housing, blight elimination through clearance, and public infrastructure and facility improvements. Concentrating resources within these objectives versus spreading limited funds among a variety of unfocused activities has proven extremely effective in improving the community and local economy.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

The City of Jackson has not invested HOME funds in rental housing; rather it has concentrated on low-income homeowners or homebuyers receiving assistance.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

The City of Jackson has not produced rental or homebuyer projects consisting of five (5) or more units.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

During Program Year 2021-2022, the City received program income in the amount of \$11,544. This program income derived from HOME-funded rehabilitation loans completed during prior years. \$37,929 in program income was expended during 2020-2021.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

The City of Jackson ensures landlords maintain housing units to decent, safe, and sanitary conditions through a biennial housing inspection process. City administration helps private developers access funding resources that may be available, such as LIHTC. The City's CHDO is in the process of completing the build and sale of two new owner-occupied housing units.

CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	0	0	0	0	0
Total Labor Hours	0				
Total Section 3 Worker Hours	0				
Total Targeted Section 3 Worker Hours	0				

Table 14 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers					
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.					
Direct, on-the job training (including apprenticeships).					
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.					
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).					
Outreach efforts to identify and secure bids from Section 3 business concerns.					
Technical assistance to help Section 3 business concerns understand and bid on contracts.					
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.					
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.					
Held one or more job fairs.					
Provided or connected residents with supportive services that can provide direct services or referrals.					
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.					
Assisted residents with finding child care.					
Assisted residents to apply for, or attend community college or a four year educational institution.					
Assisted residents to apply for, or attend vocational/technical training.					
Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.					
Provided or connected residents with training on computer use or online technologies.					
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					

Other.	0			
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Table 15 – Qualitative Efforts - Number of Activities by Program

Narrative