

JACKSON

Founded 1829



Before



After

2023 – 2024 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 2023-2024 Annual Action Plan for the period of July 1, 2023 through June 20, 2024. This is the fourth 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. 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 the original CARES Act rules and regulations for the use of CDBG-CV funds, 80% (or \$756,356) needed to be spent by the end of May 2023. 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. Upgrades to the HVAC system were completed during the previous program year, and additional funds were allocated to an East Walking Trail project in Loomis Park. This included the creation of a winding path through the East end of Loomis Park, and the addition of numerous exercise "pods" to encourage socially distanced outdoor recreation. The 80% expenditure requirement was removed by HUD in April 2023, allowing any unused funds to be spent no later than June 2, 2026. Additional projects are being considered to complete the City's CDBG-CV spending by the original deadline.

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: \$240,215.91	Homeowner Housing Added	Household Housing Unit	5	4	80.00%	1	1	100.00%
Code Enforcement (legal)	Non-Housing Community Development	CDBG: \$14,317.38	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	500	928	185.60%	300	160	53.33%
Homebuyer Rehabilitation	Affordable Housing	\$0.00	Homeowner Housing Rehabilitated	Household Housing Unit	5	0	0.00%	0	0	0.00%
Homeowner Rehabilitation	Affordable Housing	CDBG: \$ \$224,559.27 HOME: \$51,041.01	Homeowner Housing Rehabilitated	Household Housing Unit	75	50	66.66%	10	14	140.00%
Public Facilities/Infrastructure	Non-Housing Community Development	CDBG: \$854,292.02	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3,180	5,485	172.48%	4950	5,485	110.80%
Residential Demolition	Clearance and Demolition	CDBG: \$145,885	Buildings Demolished	Buildings	100	48	48.00%	10	5	50.00%

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. Rehabilitation of the Boos Center and Loomis Park continued based on priority needs identified through an architectural/engineering assessment, and included partial building demolition and interior improvements. Public infrastructure projects completed during the 2023-2024 program year included reconstruction of the pavement and curbs, and the replacement of water mains and lead service lines where needed on Perrine Street, from Michigan Avenue to Burr Street. Work on the streetscaping project will begin soon, and neighborhood evaluations to determine specific locations is ongoing.

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. Preference is given to a homeowner with a failing major component. By adding this option, the City is able to help additional homeowners replace the more expensive repairs a home needs, allowing them 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. Thirteen (13) low-income homeowner properties received 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. Five (5) demolitions were completed during the 2023-2024 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.

Goals and Objectives Narrative

The HOME-funded Partnership Park rehabilitation project subgranted to CAA was changed from a homebuyer to a homeowner activity in 2022. The 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. Rehabilitations under this activity are ongoing.

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) from the U.S. Department of Housing and Urban Development to provide supplemental funding for homelessness assistance and supportive services through several eligible activities. A required action plan was submitted in March 2023, and approved by HUD shortly thereafter. Funding will be used for the construction of affordable rental housing, the rehabilitation of existing rental housing, and additional homelessness prevention activities. Two non-profit housing partners have been identified and approved to construct two (2) homes each for a total of four (4) affordable rental homes. Homes will be constructed in neighborhoods aligning with the City of Jackson master plan, and construction is anticipated to begin in late fall 2024.

The Jackson Housing Commission / City of Jackson received a Choice Neighborhoods Planning Grant and have conducted a housing needs assessment for the Choice Neighborhood encompassing downtown and area neighborhoods, especially south of downtown. Application for a larger implementation grant continues to be a goal, with plans underway for site selection and additional HUD requirements so this project can move forward over the next 1-3 years. 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 created an Affordable Housing Development Board (AHDB) in November, 2021. They received \$3.5 million in ARPA funding from the City to initiate complementary housing programs and services. The City engaged an ARPA consultant, Guidehouse, to assist with the expenditure of these funds. A Housing Needs Assessment was also created, outlining a 10-year plan for the creation of new housing and the preservation of existing units. City Council, through a recommendation from the AHDB, approved a 2-pronged plan for these funds, including an expanded home rehabilitation program (owner and non-owner-occupied properties) and a down payment assistance/new construction project called the 100 Homes Program. The ARPA-funded rehabilitation program is currently being used to assist numerous residents with major component replacement projects. 35 buyers have been approved as part of the 100 Homes Program, with twenty (20) homes currently under

construction.

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. This included the use of ARPA funds to provide emergency hotel housing for 70 families/111 unique individuals from late December 2022 - March 2023. The City used CDBG-CV funds to expand the trail system on the east side of Loomis Park, with social distancing a key factor. The expanded trail contains socially distanced fitness pods to ensure possible future Covid-19 outbreaks or similar viral pandemics do not interfere with the area's residents desire for safe, outdoor fitness activities. All efforts were made to expend 80% of the City's CDBG-CV funds by the May 2023 deadline, and a revision to that requirement announced in the Spring of 2023 provided more flexibility and allowed for complete program spending by June 2, 2026. Plans are underway for expenditure of the remaining CDBG-CV funds by the revised deadline.

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	16	0
Black or African American	4	2
Asian	0	0
American Indian or American Native	0	0
Native Hawaiian or Other Pacific Islander	0	0
Hispanic	9	0
Total	29	2
Hispanic	9	0
Not Hispanic	20	2

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 fourteen (15) households assisted during program year 2023-2024, a total of twenty-nine (31) persons benefited from the use of CDBG or HOME funds. Other notable information includes, but is not limited to, the following:

- Total of seven (7) female heads of household
- Total of two (2) extremely low income, six (6) low income, and seven (7) moderate income
- Total of ten (10) minor children
- Eight (8) disabled persons
- Six (6) 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	1,351,448	1,101,360.30
HOME	public - federal	351,192	386,371.15

Table 3 - Resources Made Available

Narrative

The City of Jackson was awarded \$945,445.00 in CDBG-CV funds. Approximately 86% of the City's total CDBG-CV allocation has been expended on three main projects:

1. Homeless Prevention	\$196,424.25
2. Boos Center HVAC upgrades	\$226,317.87
3. Loomis Park East Trail and exercise pods project	\$330,622.00
4. Administrative expenses	<u>\$58,258.10</u>
TOTAL	\$811,622.22

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. With the timeliness requirement now removed, the City is making plans for additional CDBG-CV projects with the remaining funds, while still adhering to the June 2, 2026 final spending deadline.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation
West of Henry Ford Allegiance Health (#1)	10%	58.33 %
East of S Martin Luther King Jr Dr (#2)	10%	3.03%
West of S Martin Luther King Jr Dr (#3)	10%	20.44%

Table 4 – Identify the geographic distribution and location of investments

Narrative

This being the fourth year of the 5-Year Consolidated Plan, progress has been made in increasing CDBG investment in the three target areas since the first project year. CDBG / HOME funding amounts totaled 58.33% in Target Area 1. Projects funded included the demolition of one (1) residential property to decrease blight in the area, continued improvements to the Boos Center (210 Gilbert Street), and the completion of the Perrine St. road construction project, Burr St. to Michigan Avenue. CDBG / HOME

funding totaled 3.03% in Target Area 2. Projects funded included the demolition of one (1) residential property to decrease blight in the area. CDBG / HOME funding totaled 20.44% in Target Area 3. Projects funded included the demolition of one (1) residential property to decrease blight in the area, the construction of one (1) new single family homes developed by the City's CHDO (the Greater Jackson Habitat for Humanity), and the rehabilitation of one (1) owner-occupied property in the Parnersihp Park neighborhood. Planning continues to be undertaken by the City's rehabilitation staff to identify future projects to expand investment in the underserved target areas.

Although it appears to be unbalanced, the City reviews the needs in the target areas annually and selects projects as funding and activities present themselves. Over the course of the first four year-end reports associated with the 2020-2024 5-Year Consolidated Plan, percentage of expenditure in the three target areas equates to 50.58% of all CDBG expenditures. By target area, three years of expenditures has totaled: West of Henry Ford Allegiance Health (Target Area #1), 28.55%; East of S Martin Luther King Jr Dr (Target Area #2), 14.23%; and West of S Martin Luther King Jr Dr (Target Area #3), 7.71%.

It is anticipated during the final year of the 5-Year Consolidated Plan, an increase of funds will be invested in Target Areas two and three, to compliment the City's facilitation of the construction of 100 new single family homes, a portion of which will be in each of the 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 vacant lots to the Greater Jackson Habitat for Humanity to further its ongoing new home construction efforts. Additional matching activities/funds are planned for program year 2024, including grants from the Michigan State Housing Development Authority for the construction of new, accessible homes (MICH grant) by both the City of Jackson and the Greater Jackson Habitat for Humanity. City-owned lots will also be deeded to private developers for the construction of new single and multi-family housing, and will include sewer/water infrastructure upgrades provided by the City.

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 \$
62,072.08	25,239.60	50,046.04	0	36,265.64

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	1	1
Number of households supported through Rehab of Existing Units	10	14
Number of households supported through Acquisition of Existing Units	0	0
Total	11	15

Table 12 – Number of Households Supported

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

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.

Community Development Department staff attended many community/neighborhood events during 2023-2024, distributing materials and increasing awareness for the rehabilitation program. Attendance at those meetings has produced several new applications for assistance. This program year, of the fourteen (14) projects provided rehabilitation assistance, zero (0) were in one of the three local target areas. Further, the City received three (3) additional applications in one of the three local target areas. Of those, all three (3) were denied for not meeting program program eligibility requirements. A new staff position was added at the beginning of the 2023 program year, to assist with the processing of rehabilitation loan applications and other related housing initiatives. This added staff capacity has resulted in a significant increase in received, processed, and approved applications for rehabilitation assistance. City staff are now administering rehabilitation funds for owner and non-owner occupied properties from three (3) unique sources: CDBG, ARPA, and MI-HOPE (from the Michigan State Housing Development Authority). Seven (7) ARPA rehabilitation projects were completed during the 2023 program year. Four (4) CDBG rehabilitation projects have already been approved for the 2024 program year and are awaiting bids from local contractors. In addition, a combined thirteen (13) rehabilitation projects utilizing ARPA and/or MI-HOPE funds are pending for the 2024 program year.

Discuss how these outcomes will impact future annual action plans.

Offering rehabilitation loans for homeowners facing major components nearing the end of their useful life will continue as a high priority. City staff will continue administering funds from multiple funding sources for owner and non owner-occupied properties, including CDBG, ARPA, and MI-HOPE.

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	2	0
Low-income	5	1
Moderate-income	6	1
Total	13	2

Table 13 – Number of Households Served

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 31, 2024, 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 2023 PIT count performed by the CoC indicated 99 homeless individuals were documented, a decrease of approximately 28% from 2023. Of those, 87 were reported as sheltered and 12 were reported as unsheltered. Eight (8) individuals were considered chronically homeless, 38% fewer than in 2023, defined as a single person (or head of household) who experienced four (4) homeless episodes during the previous 12 months. Of those, 4 were reported as sheltered and 4 were reported as unsheltered.

The 2023 Housing Inventory Count (HIC) reports one-hundred (100) year-round beds in shelters for those experiencing homelessness. Forty-nine (49) beds are reserved for households without children and fifty-one (51) beds are available for households with children. In addition, the Rapid Re-Housing program reports fifty-four (54) year-round beds; Permanent Supportive Housing supplies forty-one (41) year-round beds; and Housing/Leasing Assistance supplies seventy-six (76) 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.

In December 2022, the Jackson City Council approved the use of American Rescue Plan Act (ARPA) funds for temporary homeless hotel stays, with the goal of helping homeless families and individuals obtain safe and warm temporary shelter. City staff administered this program for the first ten (10) days, and a local non-profit agency (Residents in Action) handled placements and other assistance from December 24, 2022 to March 31, 2023. In total, \$208,720 was expended from ARPA funds, providing assistance for 70 families/111 unique individuals. A homeless resource fair was also held at the conclusion of this program, with numerous local social service agencies in attendance to provide outreach and support. An additional \$3,000 in ARPA funds was used to purchase convertible sleeping bag/coats, with twenty (20) units distributed to individuals residing on the streets of Jackson. The work of Residents in Action continued into FY 2023-2024, with the hosting of a second community outreach event. The group also formalized the purchase of the former T.A. Wilson school, with plans to convert it into a homeless shelter and outreach center. The final transfer of ownership and redevelopment of the site is expected to take place during FY 2024-2025.

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. 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) from the U.S. Department of Housing and Urban Development to provide supplemental funding for homelessness assistance and supportive services through several eligible activities. A required action plan was submitted in March 2023, and approved by HUD shortly thereafter. Funding will be used for the construction of affordable rental housing, the rehabilitation of existing rental housing, and additional homelessness prevention activities. Two non-profit housing partners have been identified and approved to construct two (2) homes each for a total of four (4) affordable rental homes, serving HOME-ARP specified “qualifying populations.” Homes will be constructed in neighborhoods aligning with the City of Jackson master plan, and construction is anticipated to begin in late fall 2024. Additional HOME-ARP funds may be made available for future rental home construction projects based on phase one performance. Plans for HOME-ARP-funded rehabilitation projects will be solidified in the coming years. All HOME-ARP funds must be expended by September of 2030.

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 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. During the process, the JHC and City participated in bi-weekly planning team calls with Collabo, the consultant engaged by JHC to guide it through the planning process. A steering committee was formed with numerous members representing non-profit entities, faith-based organizations, schools, local police, local residents and others. Several community meetings took place within the Choice Neighborhood boundaries to introduce the concept of Choice Neighborhoods and what it could mean for the selected area. JHC staff were available at the community meetings to discuss ideas and assist with survey questions. The two (2)-year planning grant has officially ended, and it is anticipated that the JHC will apply for the full implementation grant in the next 12-24 months.

The JHC welcomed a new Executive Director in November, 2023. Staff was downsized by 30% during the final two quarters of FY 2023, in order to maximize resources by various positions wearing multiple hats, and in accordance with PHA industry standards. The mission of the JHC no longer adheres to the previous supportive services case management duties, and will now focus solely on housing and vouchers. The JHC remains dedicated to selling all of its scattered site homes. 2023-2024 upgrades include a new security camera system, drywall on both floors of the Reed Manor D building (damaged by a 2021 fire), repainted basketball courts at Chalet Terrace, and electrical system upgrades. The JHC has been approved for \$1.4 Million in Capital Funds from HUD for fiscal year 2024, including the ability to draw 25% of that \$1.4 Million for operational expenses.

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 anticipated RAD conversions at Shahan-Blackstone North and Chalet Terrace. In addition, Reed Manor residents were 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 Jackson Housing Commission is currently designated as "troubled" by HUD. During the 2023-2024 FY, The JHC submitted their first audit without a "disclaimed opinion" in four (4) years, balanced their budget for the first time in four (4) years, and received an approval of the Annual Plan from HUD for the upcoming fiscal year. These positive changes will allow for RAD and development work to take place at their various properties. Upon the next HUD Audit, we expect to be on a path out of the "troubled" status by the end of this fiscal year.

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.

The City of Jackson owns over six-hundred (600) vacant, buildable residential lots. Development of these parcels could provide owner-occupied and/or rental housing for many Jackson residents. The City instituted a policy to sell these lots at a flat rate of \$300 per lot to interested developers, provided they enter into a development agreement with the City to build a home on said lot.

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 replace a home's major components that have failed or are 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. Additional rehabilitation projects are also being undertaken, utilizing funds from the ARPA Expanded Rehabilitation Program and the MSHDA MI-Hope Weatherization/Energy Efficiency Program.

- *Homebuyer New Construction* – currently under development through the City's CHDO, the Greater Jackson Habitat for Humanity. Four properties have been constructed and sold as of the writing of this report, as part of the DeLand Point Project. Additional new home construction projects are being facilitated by the City of Jackson, as part of a Home Investment Partnership Program (HOME) substantial amendment. Construction is anticipated to begin in late Fall, 2024.
- *Homeowner Rehabilitation* - The HOME-funded Partnership Park rehabilitation project, subgranted to CAA, serves as a successful program for homeowner rehabilitation. was changed from a homebuyer to a homeowner activity in April 2022. Five (5) homes have sold thus far, and one (1) rehabilitation project was completed during the 2023-2024 program year. Rehabilitation projects are ongoing with expected completion of various projects during the 2024-2025 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.

Members of the Affordable Housing Development Board come from local housing non-profits, area social service agencies, the landlord community, real estate, and City leaders. The collective knowledge and experience of this group allows for collaborative dialogue and sensible solutions to Jackson's housing issues. A staff liaison ensures the recommendations of the AHDB are shared with City leaders.

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. Staff regularly review program and project files to maintain compliance at all levels.

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 2022 program performance was held during the Jackson City Council's September 26, 2023 regular meeting. During the public hearing, comments were received from five individuals and included:

- Surprise that no public comments were generated from the various CAPER public postings throughout the City of Jackson
- Questions regarding the number of black/African American individuals and families assisted with CDBG and HOME funds
- Specific questions regarding CAPER data, addressed during the hearing by City staff
- Unrelated comments concerning past and current homeless initiatives administered by a local non-profit

No public comments were received outside of the public hearing.

The notice for the September 24th public hearing was published by MLive on August 20th. The affidavit of publication is below:

INSERT PUBLICATION AFFIDAVIT HERE

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 2023-2024, the City received program income in the amount of \$25,239.60. This program income derived from HOME-funded rehabilitation loans completed during prior years. The City expended \$50,046.04 in program income during 2023-2024.

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 three-year housing inspection process. City administration helps private developers access funding resources that may be available, such as LIHTC. During the 2023-2024 program year, the City's CHDO completed the build and sale of the fourth and final new construction project for the DeLand Point project.

CR-58 – Section 3

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

Total Labor Hours	CDBG	HOME
Total Number of Activities	3	1
Total Labor Hours	6,733	757
Total Section 3 Worker Hours	0	0
Total Targeted Section 3 Worker Hours	0	0

Table 14 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME
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.		
New employee training		
Other.		

Table 15 – Qualitative Efforts - Number of Activities by Program

Narrative

Staff have completed in-person and virtual training for the Section 3 program. Staff looks forward to creating a program and implementing new protocols during the 2024-2025 program year.