

# JACKSON

Founded 1829

## Community Development Block Grant (CDBG) HOME Investment Partnerships Program



## 2026 – 2027 DRAFT Annual Action Plan

The attached document is a draft report. Please display through

**Tuesday, April 21, 2026**

Citizens are encouraged to provide comments regarding this report in writing to:

Department of Community Development

ATTN: Cory L. Mays

161 W. Michigan Ave, Jackson, MI 49201

E-mail: [cmays@cityofjackson.org](mailto:cmays@cityofjackson.org)



## Executive Summary

### AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

#### Introduction

The City of Jackson is a United States Department of Housing and Urban Development (HUD) entitlement community. As such, the City has been the recipient of Community Development Block Grant (CDBG) funds since 1974 and HOME Investment Partnerships Program (HOME) funds since 1991. HUD's three statutory goals - decent housing, suitable living environment, and expanded economic opportunities – are key in the development of viable urban communities. Eligible activities are principally targeted toward persons of low- and moderate-income. The City of Jackson presents this Annual Action Plan for the second year of its 2025 – 2029 Five-Year Consolidated Plan and covers the period of July 1, 2026 through June 30, 2027, also referred to as Program Year (PY) 2026 or Fiscal Year (FY) 2026.

#### Summary of the objectives and outcomes identified in the Plan

The level of need in Jackson is always greater than the limited amount of CDBG and HOME funds received annually. Jackson plans to target resources in the three (3) most distressed areas of the City – West of Henry Ford Allegiance Health, East of S. Martin Luther King Jr. Dr., and West of S. Martin Luther King Jr. Dr. The number of funded activities will remain low in an effort to increase their effectiveness which will include Homeowner Rehabilitation, Public Facilities/Infrastructure Improvements, Code Enforcement, Residential Demolition, Public Services, CHDO Projects (to be determined), and Homebuyer Activities.

#### Evaluation of past performance

Direct notification to homeowners in all City areas regarding the availability of the rehabilitation loans during the 2025-2026 program year led to an overwhelming response and led to a significant increase in rehabilitation applications and completed projects. City staff have a plan in place for the early identification of potential residential demolition sites, which, combined with efficient office/project management, has led to consistent performance at or above targeted demolition numbers each year. The use of HOME funds for rehabilitation and new construction initiatives continues to be a focus for City staff, and continued investments toward infrastructure projects in key residential neighborhoods provides a compliment to residential infill construction and neighborhood reinvestment. The City of Jackson demonstrated timely and responsible progress in meeting the goals and objectives stated in the 2025 – 2029 Consolidated Plan. Staff ensured compliance with all rules and regulations associated with the respective CDBG and HOME grants. Detailed progress evaluations are available in the yearly Consolidated Annual Performance and Evaluation Reports (CAPER) submitted to HUD and posted on the City's website.

#### Summary of citizen participation process and consultation process

Citizen participation and stakeholder consultation is an integral part of the Consolidated Plan process. The City's Citizen Participation Plan outlines the procedures and means by which citizens and stakeholders may provide meaningful input.

A Public Hearing to receive citizen input on the housing and community development needs was held during the January 13, 2026 regular City Council meeting. Staff's participation with the Jackson County Continuum of Care (CoC) garnered input from the various public, private, and faith-based organizations focused on low-income housing and homelessness. Staff also solicited input from organizations who serve the low-income community but do not participate in the CoC, such as the Welcome Home Organization. Finally, feedback was obtained during numerous community events (housing workshops, neighborhood outreach events, and ward meetings), and from members of the City of Jackson Affordable Housing Development Board (AHDB).

A draft copy of the Annual Action Plan was made available for public review and comment on March 17, 2026. Citizens were afforded a 30-day period in which to submit oral or written comment about the Consolidated Plan and Annual Action Plan, culminating on April 21, 2026. Citizens are also able to express concerns or comments at any time during the year before City Council meetings or by contacting grant staff.

### **Summary of public comments**

*Affordable Housing Development Board (AHDB) Meeting* – AHDB members provided feedback at a meeting held on 4/7/26, including:

*Public Hearing* – Five citizens spoke at the Public Hearing on 1/13/26, and their comments included:

1. Support for new home construction efforts and the balance of affordable, workforce, and market-rate units
2. Desire to address a gap in available transitional housing
3. Desire for the City to not receive HUD funds in the future due to nonexistent for these types of supports
4. Distrust of current data and plans regarding housing needs in Jackson
5. Unrelated comments concerning non-CDBG funded development projects
6. Unrelated comments concerning current and past non-profit work in the City

*Annual Action Plan 30-day Comment Period* – The 30-day comment period ran from March 17 – April 21, 2026. [REDACTED] comments were received.

### **Summary of comments or views not accepted and the reasons for not accepting them**

No comments or views were declined by the Jackson City Council; however, due to various federal rules and regulations, the City is not able to enact certain suggestions. The City already has programs in place to address some of the other suggestions, such as homeowner rehabilitation and payment of special assessments, and notes there are other funding resources available in the community for other suggestions, such as prisoner re-entry.

### **Summary**

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

Oftentimes there simply are not enough resources available to consider implementing every suggestion posed. Other suggestions may not fit the Council's vision and goals for the City and are taken in abeyance. There have also been several times in which citizen's comments and suggestions have been executed and helped shape the way the City of Jackson operates. The public is also invited to attend the Jackson Affordable Housing Development Board (AHDB), held monthly at City Hall. Attendees are afforded the opportunity to provide public comment (in the same manner as is allowed at City Council meetings). Finally, staff from the Community Development Department

## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

#### 1. Describe agency/entity responsible for preparing the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	JACKSON	Community Development
HOME Administrator	JACKSON	Community Development

**Table 1 – Responsible Agencies**

#### Narrative

Staff in the City’s Community Development Department administers both the CDBG and HOME grants. Grant administration includes, but is not limited to, researching and analyzing Census data; preparing and submitting the Consolidated Plan, Action Plan, Annual Performance Report, and other reports required by HUD or requested by City Council; performing environmental reviews; maintaining files and records relating to overall grant administration; monitoring sub-grantee performance and providing technical assistance when necessary; reviewing payment requests for eligibility and accuracy; and the financial responsibilities of the grants such as preparing regular drawdowns and reconciling financial records.

#### Consolidated Plan Public Contact Information

City of Jackson  
 Community Development Department  
 ATTN: Cory Mays  
 161 W Michigan Ave, 3rd Floor  
 Jackson, MI 49201  
 517-768-6461; cmays@cityofjackson.org

## **AP-10 Consultation – 91.100, 91.110, 91.200(b), 91.215(I)**

### **Introduction**

Staff in the City of Jackson’s Community Development Department is responsible for preparing the Consolidated Plan, Annual Action Plan, and Consolidated Annual Performance and Evaluation Report (CAPER). This section summarizes the consultation and citizen outreach conducted during the planning process.

### **Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).**

The City’s current Grant Coordinator participates in the monthly Continuum of Care (CoC) meetings. The Grant Coordinator also serves as the staff liaison for the City of Jackson Affordable Housing Development Board (AHDB). Both of these prior positions proved extremely insightful to the true nature of the City’s homeless and low-income populations. Continued participation with the CoC allows for ongoing interaction with the various service providers and awareness of current and emerging conditions in the community. Interaction with the AHDB provides insight regarding affordable housing issues and trends from knowledge community leaders and industry professionals.

### **Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness**

The Community Action Agency (CAA) is the lead agency for the CoC and also serves as the CoC’s fiduciary. The CoC votes on activities to fund with grants it receives from HUD and the State of Michigan, and monitors the progress of those grants through monthly, quarterly, and annual reports and discussion. CAA also receives Supportive Services for Veteran Families (SSVF) from the Department of Veterans Affairs which is also included in reports to the CoC.

### **Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS**

The CoC is charged with setting priorities for Emergency Solutions Grant (ESG) funds received through the State of Michigan. Various subcommittees of the CoC, such as Steering, Quality Control, and Housing review applications and make recommendations to the CoC body for allocation purposes. Regular consultation and reporting ensures that the use of ESG remains consistent with CoC priorities.

### **Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities**

2026-2027 Annual Action Plan, City of Jackson (draft)

1	<p><b>Agency/Group/Organization</b></p> <p><b>Agency/Group/Organization Type</b></p> <p><b>What section of the Plan was addressed by Consultation?</b></p> <p><b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>Community Action Agency</p> <p>Housing Services: housing, homeless, education</p> <p>Housing Need Assessment Homelessness Strategy Homeless Needs: chronically homeless, families with children, Veterans, unaccompanied youth Non-Homeless Special Needs Market Analysis</p> <p>Participation in CoC, direct consultation, email consultation.</p>
2	<p><b>Agency/Group/Organization</b></p> <p><b>Agency/Group/Organization Type</b></p> <p><b>What section of the Plan was addressed by Consultation?</b></p> <p><b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>Jackson Housing Commission</p> <p>Housing PHA Services: housing, homeless</p> <p>Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs: chronically homeless, families with children, Veterans Non-Homeless Special Needs Market Analysis</p> <p>Participation in CoC, direct consultation, email consultation.</p>
3	<p><b>Agency/Group/Organization</b></p> <p><b>Agency/Group/Organization Type</b></p> <p><b>What section of the Plan was addressed by Consultation?</b></p> <p><b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>Do'Chas</p> <p>Housing Services: housing, children, homeless</p> <p>Housing Need Assessment Homelessness Strategy Unaccompanied youth Non-Homeless Special Needs</p> <p>Participation in CoC.</p>

2026-2027 Annual Action Plan, City of Jackson (draft)

4	<p><b>Agency/Group/Organization</b></p> <p><b>Agency/Group/Organization Type</b></p> <p><b>What section of the Plan was addressed by Consultation?</b></p> <p><b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>Training and Treatment Innovations</p> <p>Housing Services; persons with disabilities, homeless, health</p> <p>Housing Need Assessment Homelessness Strategy Homeless Needs: chronically homeless, families with children Non-Homeless Special Needs Market Analysis</p> <p>Participation in CoC.</p>
5	<p><b>Agency/Group/Organization</b></p> <p><b>Agency/Group/Organization Type</b></p> <p><b>What section of the Plan was addressed by Consultation?</b></p> <p><b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>Kate Martin Works</p> <p>Housing PHA Services: housing, children, elderly persons, persons with disabilities, victims of domestic violence, homeless, health, education, employment, fair housing, victims</p> <p>Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs: chronically homeless, families with children, Veterans, unaccompanied youth Non-Homeless Special Needs Market Analysis</p> <p>Participation through CoC, direct consultation, email consultation.</p>
6	<p><b>Agency/Group/Organization</b></p> <p><b>Agency/Group/Organization Type</b></p> <p><b>What section of the Plan was addressed by Consultation?</b></p> <p><b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>AWARE, Inc</p> <p>Housing Services: housing, children, victims of domestic violence, homeless, health, education, employment, victims</p> <p>Housing Need Assessment Homelessness Strategy Homeless Needs - families with children Non-Homeless Special Needs Market Analysis</p> <p>Participation in CoC, email consultation.</p>

2026-2027 Annual Action Plan, City of Jackson (draft)

7	<p><b>Agency/Group/Organization</b></p> <p><b>Agency/Group/Organization Type</b></p> <p><b>What section of the Plan was addressed by Consultation?</b></p> <p><b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>Jackson Interfaith Shelter</p> <p>Housing Services: housing, children, homeless</p> <p>Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth</p> <p>Participation in CoC</p>
8	<p><b>Agency/Group/Organization</b></p> <p><b>Agency/Group/Organization Type</b></p> <p><b>What section of the Plan was addressed by Consultation?</b></p> <p><b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>Legal Services Of South Central Michigan</p> <p>Housing Services: housing, children, elderly persons, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, homeless, health, fair housing, victims</p> <p>Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis</p> <p>Participation through CoC, direct consultation, email consultation.</p>
9	<p><b>Agency/Group/Organization</b></p> <p><b>Agency/Group/Organization Type</b></p> <p><b>What section of the Plan was addressed by Consultation?</b></p> <p><b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>disAbility Connections</p> <p>Housing Services-Persons with Disabilities</p> <p>Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs</p> <p>Participation through CoC</p>
10	<p><b>Agency/Group/Organization</b></p> <p><b>Agency/Group/Organization Type</b></p>	<p>Department of Health &amp; Human Services</p> <p>Housing Services: housing, children, elderly persons, persons with disabilities, victims of domestic violence, health Health Agency Child Welfare Agency Other government - State</p>

	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participation through CoC
11	<b>Agency/Group/Organization</b>	Henry Ford Allegiance Health
	<b>Agency/Group/Organization Type</b>	Housing Services: homeless, health Health Agency Major Employer
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participation through CoC
12	<b>Agency/Group/Organization</b>	United Way of Jackson County
	<b>Agency/Group/Organization Type</b>	Services: housing, children, elderly persons, persons with disabilities, victims of domestic violence, homeless, health, education, employment Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Economic Development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Email consultation

Table 2 – Agencies, groups, organizations who participated

**Identify any Agency Types not consulted and provide rationale for not consulting**

Efforts were made to include a wide range of community stakeholders in the consultation process; no agency was intentionally excluded from participation.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Community Action Agency	The CoC works to support homeless individuals and families work toward self-sufficiency.
Statewide Housing Plan	Michigan State Housing Development Authority	This strategic plan to addresses housing needs across all geographic and income areas.
2016 Community Master Plan	City of Jackson	This comprehensive plan focuses on housing, economic development, land use, transportation, health, community facilities, services, and other related topics.
Comprehensive Economic Development Strategy	Region 2 Planning Commission	Provides an analysis of the local economy, identification of economic development goals and strategies, and efforts to reduce unemployment and increase income.
Housing Strategy and Policy Framework	City of Jackson	This comprehensive, City-wide needs assessment provides data-informed suggestions related housing needs at all levels over a 10-year span.
Capital Improvements Plan	City of Jackson	A 5-year plan outlining necessary spending for critical infrastructure projects.
Economic Development Strategy	City of Jackson	Provides an analysis of the local economy in the City specifically, and identification of economic development goals and strategies.
Public Participation Plan	City of Jackson	Filled with goals, strategies, and processes to encourage complete and thoughtful engagement with citizens and community groups in the City of Jackson.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative**

City of Jackson leaders and staff maintain an open cooperative effort with the County of Jackson and surrounding townships to the extent possible as it impacts each of the communities and the County as a whole. Efforts to assist the Jackson Housing Commission with their ongoing efforts will continue. City staff consults with the Jackson County Health Department and various departments of the State of Michigan to improve the health and livability of the community. The City of Jackson is a recipient of numerous grant funds from the Michigan State Housing Development Authority (MSHDA), and is an active participant in the MSHDA Region K Housing Stock Working Group. Collaboration with MSHDA and local/state partners continues through this work, and through frequent attendance at regional / state housing events.

## **AP-12 Participation – 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

The City of Jackson follows its Citizen Participation Plan to encourage citizen participation in the planning and utilization of CDBG and HOME funds. A public hearing is held in January to receive comments on the housing and community development needs in the City before the Consolidated Plan and/or Annual Action Plan is available for citizen comment. Notice of the public hearing is available on the City's website and printed as a display ad in two local newspapers no less than ten (10) days in advance of the hearing. All views and comments are considered and incorporated in the appropriate plan.

Once the Consolidated Plan and/or Annual Action Plan is in draft form, the public is provided 30 days to review and submit comments; notice of the availability of the plan is again published in the two newspapers and listed on the City's website. Hard copies are made available at two (2) locations in City Hall, at the Community Action Agency, the main branch of the Jackson District Library, and the three (3) public housing complexes; an electronic version is available through the City's website. All views and comments are considered and incorporated in the appropriate plan.

The public is also notified when the City submits its Request for Release of Funds via newspapers and the City's website, and allows for no less than 15 days to submit comments. If a substantial amendment is required during the course of the program year, hard and electronic copies are made available at the locations noted above with the notice of availability published in the local papers and on the website. Citizens are provided no less than 30 days within which to submit written comments and/or to attend a public hearing to provide oral comments. The annual report is published and distributed in the same manner as described above, culminating in a public hearing after a 15 day comment period.

## Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Hearing	Minorities Persons with disabilities Non-targeted /broad community Residents of Public and Assisted Housing	A public hearing was held before the Jackson City Council on January 13, 2026. Five citizens spoke during the public hearing.	Support for new home construction efforts; a desire to address a gap in available transitional housing; a desire for the City to not receive HUD funding in the future; a distrust of current data and plans regarding affordable housing needs; unrelated comments concerning non-CDBG funded projects; and unrelated comments concerning current and past non-profit projects.	No comments or views were declined by the Jackson City Council; however, due to various federal rules and regulations, the City is not able to enact certain suggestions. The City already has programs in place to address some of the other suggestions and notes there are other funding resources available for other suggestions.	
2	Newspaper Ad	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Notice of the Public Hearing; availability of the draft Annual Action Plan in both hard copy and electronic form and time within which to submit comments.	No written comments were received.	No written comments were received.	
3	Internet Outreach	Non-targeted /broad community	No written comments were received.	No written comments were received.	No written comments were received.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
4	Jackson District Library Carnegie Branch	Minorities Persons with disabilities Non-targeted /broad community	Hard copy of Consolidated Plan and Annual Action Plan made available in the Resource Center for public review and comment.	No written comments were received.	No written comments were received.	
5	Jackson Housing Commission	Minorities Persons with disabilities Residents of Public and Assisted Housing	Hard copy of Consolidated Plan and Annual Action Plan made available for public review/comment at three locations: Chalet Terrace, Reed Manor, and Shahan-Blackstone North.	No written comments were received.	No written comments were received.	
6	Community Action Agency	Minorities Persons with disabilities Non-targeted /broad community Residents of Public and Assisted Housing	Hard copy of Consolidated Plan and Annual Action Plan made available in CAA's lobby for public review/comment.	No written comments were received.	No written comments were received.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
7	Affordable Housing Development Board	Service providers Residents of low-moderate income housing	AHDB board members and one citizen provides comments at the meeting held on 4/7/26		See <i>public hearing</i> above	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources – 91.220(c)(1,2)

#### Introduction

For planning purposes, the City deducts 3% from the most current formula allocation then adds in anticipated program income by grant. Estimated revenue for fiscal year 2026–2027 is as follows:

- **CDBG:** 2025-26 formula allocation: \$1,205,801; less 3% (-\$36,200); plus estimated program income (\$75,200) = \$1,244,801 (FY 26-27)
- **HOME:** 2025-26 formula allocation: \$275,362; less 3% (-\$8,300); plus estimated program income (\$1,000) = \$268,062 (FY 26-27)

As of the writing of the Annual Action Plan, HUD has not published the nation's 2026-2027 formula allocations. Any increased funding for CDBG should be allocated to the homeowner rehabilitation project, and any decreased funding for CDBG should be absorbed in the streetlight installation project. Any increased or decreased funding for HOME should be absorbed in the homebuyer assistance project.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2			Expected Amount Available Remainder of ConPlan	Narrative Description	
			Annual Allocation:	Program Income:	Prior Year Resources:			
CDBG	Federal	Acquisition, Admin/ Planning, Economic Development, Housing, Public Improvements, Public Services	\$1,169,601	\$75,200	-0-	\$1,244,801	\$3,528,055	Annual block grant from HUD to address community development and housing needs.
HOME	Federal	Homebuyer Assistance, Homeowner Rehab, New Construction For Ownership	\$267,062	\$1,000	-0-	\$268,062	\$757,068	Annual grant from HUD to address affordable housing

**Table 5 - Expected Resources – Priority Table**

#### **Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

The City leverages CDBG and HOME funds to the extent possible against other federal, state, local, and private funding to maximize project impact. Leveraging varies from activity to activity, depending on the project and availability of additional resources that are eligible for that type of use. The City recently received a grant award of \$880,000 from the Michigan State Housing Development Authority (MSHDA), for the creation

of affordable homes that are visitable. Construction of these homes was completed in the Spring of 2026. The City is also utilizing funds from the American Rescue Plan Act (ARPA) for an Expanded Rehabilitation Program. This \$500,000 investment will provide rehabilitation services for owner and non owner-occupied properties. Both the MSHDA and ARPA-funded rehabilitation programs feature a \$25,000 per property project maximum, and both will allow the City to target its aging housing stock and support lower-income families.

The CDBG program does not require matching funds like the HOME Investment Partnerships Program. Generally, HOME requires a participating jurisdiction contribute or match 25% of HOME funds spent on affordable housing; however, Jackson has been 100% exempted from this requirement due to fiscal distress.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

Since 2012, City leaders accumulated tax foreclosed parcels not sold at public tax auctions with the end goal of amassing sufficient contiguous parcels in various areas to promote for redevelopment. One such area is at the corner of Franklin and Mechanic Streets where vacant parcels owned by the City of Jackson and CAA provided the impetus for an affordable housing collaboration. The Greater Jackson Habitat for Humanity used these parcels to construct four (4) new single-family homes as the City’s Community Housing Development Organization (CHDO) for sale to income qualified homeowners upon completion, completed in 2024. Habitat for Humanity recently constructed 2 single-family homes on land provided by the City of Jackson. Habitat for Humanity will construct a home near downtown on City-owned land in the summer of 2026, utilizing CHDO funds from the City’s HOME entitlement grant, HUD. The City will also provide land to two (2) local nonprofit agencies for the construction of four (4) homes as part of the City’s HOME-ARP allocation. Finally, City land was used for the construction of four (4) visitable homes, with funding from the MSHDA MICH grant program.

The City also owns approximately 500+ buildable residential lots, products of a multi-year demolition program aimed at reducing neighborhood blight. Utilizing ARPA funds, the City is offering down payment assistance to income-qualified buyers for the purchase of newly constructed homes on these vacant lots, as part of the “100 Homes Program.” Builder/developer incentives are layered into this innovative program, and new homes are under construction. Similar builder/developer incentives are being offered outside of the 100 Homes Program, and as a result new homes are being built throughout the City, marking the beginning of an anticipated larger-scale neighborhood rebuilding process.

**Discussion**

Developers are building new residential units in the City of Jackson. While the City currently owns a plethora of buildable parcels, demand is high and the strategic acquisition of additional buildable vacant parcels is vital to plan for future housing needs. City staff will continue working to acquire strategically placed parcels through the tax foreclosure process (exercising the right of first refusal), donation and, when needed, purchase.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeowner Rehabilitation	2026	2027	Affordable Housing	3 Target areas; all other areas as needed	Homeowner Rehabilitation	\$250,000 CDBG	Homeowner Rehabilitation: 10 homeowner units rehabilitated
2	Public Facilities/Infrastructure	2026	2027	Non-Housing Community Development	3 target areas; all other eligible areas	Public Facilities/ Infrastructure	\$469,801 CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2,000 Persons Assisted
3	Code Enforcement (legal)	2026	2027	Non-Housing Community Development	3 Target areas; all other areas as needed	Code Enforcement (Legal)	\$25,000 CDBG	Housing Code Enforcement: 300 Household Housing Unit
4	Residential Demolition	2026	2027	Clearance and Demolition	3 target areas; all other eligible areas	Residential Demolition	\$200,000 CDBG	Buildings Demolished: 6 Buildings
5	New Construction - CHDO	2026	2027	Affordable Housing	3 target areas; all other eligible areas	New Construction (CHDO)	\$42,000 HOME	Homeowner Housing Added: 1 Household Housing Unit
6	Homebuyer Activities	2026	2027	Affordable Housing	3 target areas; all other eligible areas	New Construction	\$200,062 HOME	Homeowner Housing Added: 3 Household Housing Unite

**Table 6 – Goals Summary**

## Goal Descriptions

<b>1</b>	<b>Goal Name</b>	Homeowner Rehabilitation
	<b>Goal Description</b>	The Homeowner Rehabilitation Program will continue providing major component replacement of aging systems for owner-occupied properties.
<b>2</b>	<b>Goal Name</b>	Public Facilities/Infrastructure
	<b>Goal Description</b>	Streetscape improvements (including tree planting, sidewalk and curb/gutter repairs), for the improvement of various neighborhoods; and streetlight installation
<b>3</b>	<b>Goal Name</b>	Code Enforcement (legal)
	<b>Goal Description</b>	Legal support to the Community Development Department to improve low-income neighborhoods and properties.
<b>4</b>	<b>Goal Name</b>	Residential Demolition
	<b>Goal Description</b>	Demolition of foreclosed, vacant, or abandoned and dilapidated publicly or privately owned property in low-income neighborhoods. Removal of hazardous buildings increases the quality of life and vitality of neighborhoods, supports property values, eliminates hazardous conditions, and reduces opportunities for criminal activities.
<b>5</b>	<b>Goal Name</b>	New Construction - CHDO
	<b>Goal Description</b>	HOME funds set aside for future CDHO-eligible projects yet to be identified
<b>6</b>	<b>Goal Name</b>	Homebuyer Activities
	<b>Goal Description</b>	New construction for income-eligible households with homebuyer supports, including (but not limited to) down payment assistance and hard/soft costs

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The City of Jackson is funding projects to achieve the goals and objectives defined in the 2025-2029 Five-Year Consolidated Plan to generally improve the livability and accessibility of low-income neighborhoods. After several years of focusing CDBG funds towards the revitalization of the downtown, City leaders have expanded assistance into the adjoining neighborhoods. Housing, parks, and infrastructure projects have been the focus of these efforts. As the City moves into the next phase of work under this 5-year plan, neighborhood reinvestment will be the focus. The initial phase will focus on streetscape improvements, streetlight installation, clearance of severely dilapidated residential structures, and rehabilitation. The fundamental goal is to improve the living conditions for the low- to moderate-income households residing in the three target areas specified in the Consolidated Plan.

#### Projects

#	Project Name
1	Residential Rehabilitation
2	Streetscape Improvements
3	Streetlight Installation
4	Code Enforcement—Legal Services
5	Residential Demolition
6	Rehabilitation Administration
7	General Administration/Planning
8	Community Housing Development Organization (CHDO) Reserve
9	Homebuyer Activities

Table 7 – Project Information

#### Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The level of CDBG funds Jackson receives annually is relatively low considering increasing costs to implement improvements and is insufficient to meet all the demands for assistance. Historically, attempting to fund as many projects as possible did little to impact the residents as a whole; therefore, the number of projects has decreased to ensure sufficient funding to complete activities which boost the community overall. City leaders recognize needs exist in the community but are also cognizant of many other non-housing needs it is solely responsible for, such as infrastructure improvements, park improvements, street lighting, etc. Reliance on non-profit and faith-based organizations to meet the low-income population's direct service needs through other available funding sources allows the City to focus on improving low-income neighborhoods which subsequently impacts the entire City.

## AP-38 Project Summary

### Project Summary Information

<b>1</b>	<b>Project Name</b>	Residential Rehabilitation
	<b>Target Area</b>	West of Henry Ford Allegiance Health; East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr, all other areas as needed
	<b>Goals Supported</b>	Homeowner Rehabilitation
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$250,000
	<b>Description</b>	Provision of zero-interest, low repayment rehabilitation loans to low-income households to replace aged major components in the primary residence before they become an emergency.
	<b>Target Date</b>	6/30/2027
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Specific sites will be determined in the future.
	<b>Location Description</b>	Specific sites will be determined in the future.
	<b>Planned Activities</b>	Ten (10) or more low-income homeowners will receive rehabilitation assistance.
<b>2</b>	<b>Project Name</b>	Streetscape Improvements
	<b>Target Area</b>	West of Henry Ford Allegiance Health; East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr, all other eligible areas as needed
	<b>Goals Supported</b>	Public Facilities/Infrastructure
	<b>Needs Addressed</b>	Neighborhood Improvements
	<b>Funding</b>	CDBG: \$150,000
	<b>Description</b>	Streetscape improvements to various City blocks, including sidewalk repairs, curb cuts, and the planting of street trees to encourage in-fill housing by developers

	<b>Target Date</b>	6/30/2027
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Specific neighborhood blocks will be determined in the future.
	<b>Location Description</b>	Specific blocks will be determined in the future.
	<b>Planned Activities</b>	To be determined
<b>3</b>	<b>Project Name</b>	Streetlight Installation
	<b>Target Area</b>	West of Henry Ford Allegiance Health; East of S Martin Luther King Jr Dr.
	<b>Goals Supported</b>	Public Facilities/Infrastructure
	<b>Needs Addressed</b>	Neighborhood Improvements
	<b>Funding</b>	CDBG: \$319,801
	<b>Description</b>	Streetlight installation in CDBG-eligible areas to create safe and walkable neighborhoods and to encourage in-fill housing by developers
	<b>Target Date</b>	6/30/2027
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Specific area(s) will be determined in the future
	<b>Location Description</b>	Specific area(s) will be determined in the future
	<b>Planned Activities</b>	Streetlight installation in CDBG-eligible areas to create safe and walkable neighborhoods and to encourage in-fill housing by developers
<b>4</b>	<b>Project Name</b>	Code Enforcement - City Attorney's Office
	<b>Target Area</b>	Not applicable
	<b>Goals Supported</b>	Code Enforcement (legal)
	<b>Needs Addressed</b>	Code Enforcement (Legal)
	<b>Funding</b>	CDBG: \$25,000
	<b>Description</b>	The City Attorney's Office provides legal services for various code enforcement activities including housing code enforcement and blight elimination, contract review, and approval.

	<b>Target Date</b>	6/30/2027
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 300 cases will be filed for prosecution in the City's Administrative Hearings Bureau to help eliminate blight and improve neighborhood quality in the low-income residential areas of the City.
	<b>Location Description</b>	Various CDBG-eligible neighborhoods within the City of Jackson which are comprised of 51% or more low- to moderate-income residents.
	<b>Planned Activities</b>	Enforcement of various housing and blight ordinances to improve neighborhood conditions.
<b>5</b>	<b>Project Name</b>	Residential Demolition
	<b>Target Area</b>	West of Henry Ford Allegiance Health; East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr, all other eligible areas as needed
	<b>Goals Supported</b>	Residential Demolition
	<b>Needs Addressed</b>	Residential Demolition
	<b>Funding</b>	CDBG: \$200,000
	<b>Description</b>	Demolition of foreclosed, vacant, or abandoned residential properties within CDBG-eligible areas across the City.
	<b>Target Date</b>	6/30/2027
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Limited to no more than 30% of the City's annual CDBG expenditures, approximately six (6) residential structures will be demolished.
	<b>Location Description</b>	Eligible sites will be determined based upon Section 106 review and located in CDBG-eligible areas within the City.
	<b>Planned Activities</b>	Demolish foreclosed, vacant, or abandoned residential structures within CDBG-eligible neighborhoods.
<b>6</b>	<b>Project Name</b>	Rehabilitation Administration
	<b>Target Area</b>	Not applicable
	<b>Goals Supported</b>	Homeowner Rehabilitation

	<b>Needs Addressed</b>	Rehabilitation Administration
	<b>Funding</b>	CDBG: \$150,000
	<b>Description</b>	All delivery costs directly related to carrying out housing rehabilitation activities, including staff, other direct costs, and service costs.
	<b>Target Date</b>	6/30/2027
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Specific sites will be determined in the future.
	<b>Location Description</b>	Specific sites will be determined in the future.
	<b>Planned Activities</b>	Ten (10) or more low-income homeowners will receive rehabilitation assistance.
<b>7</b>	<b>Project Name</b>	Administration/Planning
	<b>Target Area</b>	Not applicable
	<b>Goals Supported</b>	Not applicable
	<b>Needs Addressed</b>	Administration/Planning
	<b>Funding</b>	CDBG: \$150,000 HOME: \$ 26,000
	<b>Description</b>	Overall program administration, including, but not limited to, salaries, wages, and related costs of grantee staff or others engaged in program management, monitoring and evaluation.
	<b>Target Date</b>	6/30/2027
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Not applicable
	<b>Location Description</b>	Not applicable
	<b>Planned Activities</b>	Not applicable
	<b>Project Name</b>	CHDO Reserve Activity

<b>8</b>	<b>Target Area</b>	West of Henry Ford Allegiance Health; East of S Martin Luther King Jr Dr, West of S Martin Luther King Jr Dr, all other eligible areas as needed
	<b>Goals Supported</b>	CHDO Reserve
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$42,000
	<b>Description</b>	Funds held in reserve for use by a certified CHDO on future eligible activities
	<b>Target Date</b>	6/30/2029
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Specific activities will be determined in the future.
	<b>Location Description</b>	Specific activities will be determined in the future.
	<b>Planned Activities</b>	To be determined
<b>9</b>	<b>Project Name</b>	New Construction
	<b>Target Area</b>	West of Henry Ford Allegiance Health; East of S Martin Luther King Jr Dr., all other eligible areas as needed
	<b>Goals Supported</b>	Homebuyer Activities
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$200,062
	<b>Description</b>	New construction for income-eligible households with homebuyer supports, including (but not limited to) down payment assistance and hard/soft costs
	<b>Target Date</b>	6/30/2029
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Specific activities(s) will be determined in the future
	<b>Location Description</b>	Specific area(s) will be determined in the future
<b>Planned Activities</b>	To be determined	

## AP-50 Geographic Distribution – 91.220(f)

### Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The 2025-2029 Five-Year Consolidated Plan identified three (3) local target areas for funding allocation priorities:

**West of Henry Ford Allegiance Health** - Identified in the 2016 Master Plan as part of the Health and Downtown Neighborhoods, both of which were deemed transitional. This area was also labeled as place-making, forming part of the community's core and in the top tier for transit and non-motorized connectivity. While significant housing development is occurring in the neighborhood, additional work must continue related to infrastructure improvements.

**East of S Martin Luther King Jr Dr** - Identified as the King Neighborhood in the 2016 Master Plan, it was noted that while among the most distressed in the City, it scored high in place-making. The King Neighborhood links the downtown to its southern borders and is accessible by transit. This area is home to 126 public housing units and 200 HUD-subsidized units. Few major commercial businesses is located in the neighborhood. The MLK-CIA is working hard to transform this area, through community-centered leadership and the effective distribution of American Rescue Plan Act (ARPA) funds. CDBG and HOME-funded programs related to housing and infrastructure development/stabilization will provide an excellent compliment to this work.

**West of S Martin Luther King Jr Dr** - This area is partially in the Downtown and Partnership Park neighborhoods as identified in the 2016 Master Plan. While the Downtown neighborhood is labeled transitional, Partnership Park is deemed distressed.

The local target area "West of Henry Ford Allegiance Health" is located between Ganson Street and the railroad tracks running parallel with Louis Glick Highway from Mechanic Street on the west and Waterloo Avenue on the east. South Martin Luther King Jr. Drive (formerly Francis Street) is the dividing line between two other target areas, both of which run between Franklin Street and High Street. The east half will cover the area between South Martin Luther King Jr. Drive and Cooper Street; the west half will cover the area between South Martin Luther King Jr. Drive and Greenwood Avenue.

### Geographic Distribution

Target Area	Percentage of Funds
West of Henry Ford Allegiance Health	15
East of S Martin Luther King Jr Dr	15
West of S Martin Luther King Jr Dr	15

Table 5 - Geographic Distribution

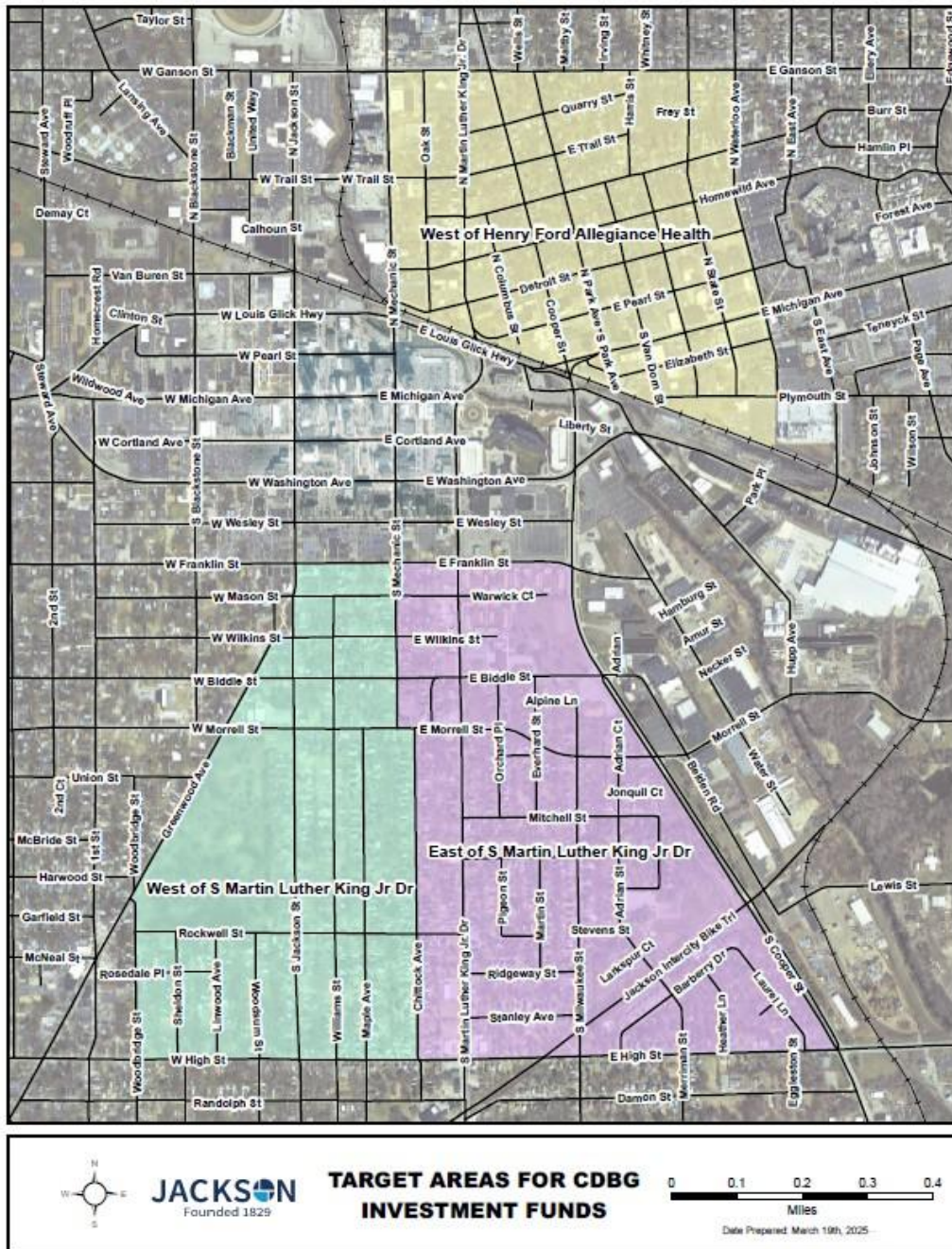
### Rationale for the priorities for allocating investments geographically

The public reinvestment in the City of Jackson began in the downtown core over ten (10) years ago. The City of Jackson's long-term approach, as outlined in the 2016 Master Plan, included the revitalization of the urban center AND surrounding areas. Over the past 5 years, coordinated efforts have moved into residential neighborhoods in all areas of the City, with significant investments completed, underway, and/or planned related to housing, infrastructure, community spaces, and safety/security. An analysis of current census tract/block group data reveals continued low-moderate income concentrations in key parts of the City. Entitlement funds will be utilized, to the fullest extent possible, to continue the City's

work in these target areas to eliminate blight, support safe and affordable housing, and provide upgrades to infrastructure, all aimed at building back Jackson’s neighborhoods one block at a time. The percentage of low- to moderate-income residents in these three target areas ranges from 70.64% to 92.70%. Census Tracts 11 is also one (1) of only two (2) Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) areas within the City limits.

**Discussion**

Efforts to expend grant funds in or near these target areas will be made to the greatest extent feasible. The City will provide year-end results in its Consolidated Annual Performance and Evaluation Report.



## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

Over 90% of the City’s housing stock was built before 1978; lower income homeowners are often unable to pay for the cost of repairs or obtain financing at affordable rates. Due to years of deferred maintenance and the likely presence of lead-based paint, fully rehabilitating owner-occupied housing has become cost prohibitive, hindering the City’s ability to provide assistance. Available zero-interest, low repayment rehabilitation loans are now limited to replacing a home’s major components that are nearing the end of their useful lifespan before they become an emergency. New housing unit production is needed to increase the availability of affordable housing to the City’s low-income residents pursuing the American Dream of homeownership. The City will utilize HOME funds for this purpose through described homebuyer activities, including a planned down payment assistance program for new construction homes maintaining an appropriate affordability period for households earning at or below 80% of the area median income.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	11
Special-Needs	0
<b>Total</b>	<b>11</b>

**Table 9 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	1
Rehab of Existing Units	10
Acquisition of Existing Units	0
<b>Total</b>	<b>11</b>

**Table 10 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Jackson Housing Commission (JHC) has served as the City's Public Housing Authority (PHA) for nearly 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).

### **Actions planned during the next year to address the needs to public housing**

The City of Jackson has a strong working relationship with the Jackson Housing Commission (JHC). The JHC Executive Director currently serves on the City's Affordable Housing Development Board (AHDB), meeting regularly with City staff to discuss JHC needs and current initiatives. The JHC is a sub-recipient of funds from a State Allocation Grant, administered by City staff and aimed at improving conditions and tackling capital improvements at all JHC facilities. JHC leadership is actively working to improve conditions at all facilities, in particular Reed Manor. On-time reporting to HUD, transparency, and attention to resident needs are major focus areas.

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

Active Resident Advisory Boards are in place at Reed Manor. Several attempts have been made to initiate a Resident Advisory Board at Shahan-Blackstone North and Chalet Terrace, but efforts have thus far fallen short. Residents are encouraged to attend Board meetings, talk with their housing managers, and even the Executive Director if warranted. JHC Housing Managers conduct one-on-one meetings with residents to address their concerns and gather feedback on specific issues or interests, such as tenant handbook guidelines, recreation, safety, or community gardens, and explore training opportunities for residents to develop skills and become leaders within their communities. JHC also rotates Board Meetings at each different asset management project (AMP).

Annual surveys are distributed to tenants to get their opinions on real or perceived conditions at their complex and what improvements they would like to be considered. Approximately 30 years ago, the JHC participated in a homeownership program through HUD and created fifty (50) scattered site, single family homes with the intent to provide homeownership opportunities to its residents. When the program ended, only ten (10) homes had been sold and the other 40 incorporated as scattered-site units through either Chalet Terrace or Shahan.

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

The JHC is currently listed as a HUD troubled agency. The JHC is currently managed by an outside company, with direct supervision by the JHC board of directors. Staff are working closely with HUD to remediate all remaining reporting and financial requirements.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

The Jackson County Continuum of Care (CoC) is the local homeless assistance planning group, which encourages community collaboration to address housing and homeless needs. The CoC is comprised of representatives from a variety of non-profit entities, faith-based organizations, community stakeholders, and state and local government serving households and individuals experiencing housing crises. The group's focused, structured approach identifies existing needs and resources, detects gaps in service, and monitors emerging conditions. Funding received by the CoC is used to prevent homelessness, rapidly re-house people in a housing crisis, and transform the system so more people can obtain and maintain housing.

Homeless providers in Jackson County use a Homeless Management Information System (HMIS) to collect client-level data and data on the provision of housing to homeless individuals and families, and persons at risk of homelessness. The CoC also participates in an annual Point-in-Time (PIT) Count where volunteers count both sheltered and unsheltered persons experiencing homelessness on a single night in January. Data in this Homeless Needs Assessment was gleaned from both the current HMIS data to capture a full year of information, and the 2026 PIT Count conducted on January 28, 2026.

**Describe the jurisdictions one-year goals and actions for reducing and ending homelessness, including:**

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

City staff will continue to participate with the CoC, including subcommittees, to the extent feasible. It is important not only to keep City leaders aware of the community's health and emerging needs, but also to impart knowledge and understanding of government capabilities and limitations. Exchange of information is essential along with actionable participation by City staff.

Homeless facilities and services are managed and provided through agencies that participate with the CoC. Outreach is conducted at emergency shelters, domestic violence shelters, with youth providers, and through street outreach to locate potential participants. Case managers complete an initial assessment to prioritize need and set housing stability goals. The City provided homeless hotel housing assistance from December 2023-April 2024, beginning with on-the-ground assistance and transitioning to administering grant funding to a local agency. While there are no immediate plans for City staff to direct assistance in this way moving forward, financial and logistical support continues.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The CoC adopted a Coordinated Entry policy, which ensures people with the greatest needs receive priority for any type of housing and homeless assistance. Coordinated Entry does not screen people out for assistance because of perceived barriers to housing or services including, but not limited to, lack of employment or income, drug or alcohol use, or having a criminal record. Clients are linked to community resources which best meet their immediate and future needs.

### **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**

Homeless households are encouraged to obtain an assessment and linkage to available services to help resolve their housing crisis through CAA. Outreach staff is strategically placed in the community to ensure homeless or at-risk households are aware of community resources to prevent or end homelessness. The housing assessment program will continue to assess at-risk households to prevent homelessness by using available prevention resources, shelter diversion tactics, and linkage to mainstream resources to avoid loss of housing.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: 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); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

Preventing homelessness from occurring at all is the most effective means to avoid trauma to families and the creation of larger crises which might prevent a household from moving forward successfully. CAA receives funding from HUD to operate a rapid re-housing program, providing short-term assistance to persons at risk of becoming homeless. Coordinating with mainstream providers continues to support effective and efficient access to mainstream benefits by eligible participants.

On September 21, 2021, the City of Jackson was notified that it was eligible to receive \$1,137,398 in HOME Investment Partnerships Program – American Rescue Plan (HOME-ARP) funds from the U.S. Department of Housing and Urban Development upon approval of this Allocation Plan. The purpose of this supplemental funding is to provide homelessness assistance and supportive services through several eligible activities, which include: the production or preservation of affordable housing; tenant based rental assistance (TBRA); supportive services (including homeless prevention services and housing counseling); the purchase or development of non-congregate shelters; administration and planning; and Non-profit operating and capacity building assistance. The City’s Allocation Plan was approved by HUD in the Spring of 2023, describing the distribution of HOME-ARP funds and identifying any preferences for eligible activities which primarily assist the HOME-ARP qualifying populations, including: homeless persons; persons at risk of becoming homeless; those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; other populations where assistance would prevent the family’s homelessness or serve those with the greatest risk of housing instability; and, veterans and families that include a veteran family member that meet one of the preceding criteria. The City of Jackson has identified three target areas for funding: rental housing construction, rental housing rehabilitation, and supportive services. These funds must be spent by September 30, 2030.

**Discussion**

Residents in Action, a local “boots on the ground” nonprofit, recently acquired the former T.A. Wilson school, for conversion to a formal homeless shelter. The facility is currently closed, pending funding to assist with staff and maintenance costs. 10 Pallet shelters were purchased in 2023, and were used during the winter of 2024 at the T.A. Wilson site. Each shelter can hold two (2) people, for a maximum of 20 possible beds when utilizing these temporary shelters. The pallet shelters are currently in storage for possible use at a later date. The Jackson Interfaith Shelter will soon begin construction of an additional homeless facility near their current location just South of downtown. The City is partnering

with two local housing nonprofit agencies (The Welcome Home Organization and Kings Community Homes), for the creation of homeless transitional housing for qualifying populations with funds from the HOME-ARP program. Construction is expected to begin in late 2026/early 2027.

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

Conversations with local housing providers and social service agencies 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 who 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 utility deposits
- 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 not at fair market value
- 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.
- Inability to save sufficient funds for a required down-payment for the purchase of a home
- Limited housing stocks at all income levels and price points, but most notably for low-moderate income earners.

### **Actions it planned 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**

The City of Jackson does not intentionally create policies, codes, or rules that create 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.

City staff will continue to collaborate with the CoC to develop strategies to remove or ameliorate barriers to affordable housing. The CoC has identified several strategies to implement, including, but not limited to, the following:

- Further the Landlord Advocacy and Education position currently funded for the short term.
- Work with landlords to determine what they would require to expand the number of units available to subsidy.
- Increase the number of landlords willing to rent to Housing Choice Voucher holders.
- Develop a multi-sector strategy to reduce issues involving utilities as a barrier to housing.
- Another concept to increase acceptance of tenants with Housing Choice Vouchers is to establish a fund to assist the private-market landlord with repairing potential damages incurred when accepting an irresponsible Section 8 tenant.

**Discussion:**

The City's Affordable Housing Development Board regularly provides experience-based advice to staff regarding possible solutions regarding the availability of affordable housing. In conjunction with the 2023 Housing Strategy and Policy Framework, numerous strategies are in place to attack this issue, including the 100 Homes Program and the Expanded Rehabilitation Program (both supported with ARPA funds). Additional new construction projects throughout the City will also offer greater affordable housing options, including single-family and multi-family units in all parts of the City. Local, state, and federal subsidies are being levied to assist with many of these projects, and the City of Jackson is focused on developing multiple housing options that are affordable at various income levels.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

The activities and goals of the 2026-2027 Annual Action Plan coincide with the priorities identified in the 2025-2029 Five-Year Consolidated Plan. Some activities funded during this first year of the Consolidated Plan were planned activities during the prior Consolidated Plan. Other activities are funded to begin the assessment and planning stages of the three local target areas. The City's Housing Rehabilitation Policies and Procedures will undergo review and revision during this AP year.

### **Actions planned to address obstacles to meeting underserved needs**

City staff will continue to maintain its network of state and local public agencies and non-profit service providers. The use of CDBG or HOME funds to meet underserved needs will be subject to fluctuations in annual funding. Funds may or may not be allocated accordingly.

### **Actions planned to foster and maintain affordable housing**

As noted above, the City will assist low-income homeowners with housing maintenance and emergency repairs. In addition, the City's CHDO will develop affordable housing units for resale to qualifying low-income households. In addition, homebuyer activities involve the construction of new single-family homes and the rehabilitation of 16 former LIHTC rental units being purchased by income qualified first-time homebuyers.

The Jackson City Council adopted an Affordable Housing ordinance in late 2021, adding Article IX - Affordable Housing Development Board to its Housing ordinance found at Chapter 14 of the City of Jackson Code of Ordinances. The purpose and intent of adding Article IX to Chapter 14 is to:

- 1) Promote the health, safety, and general welfare of the people of the City of Jackson through the implementation of housing goals, objectives, and policies that support economically integrated housing opportunities in the development or rehabilitation of housing;
- 2) Stimulate the production and preservation of owner-occupied and non-owner occupied housing available to low-income individuals or families; and
- 3) Optimize benefits available to low- and moderate-income residents by incentivizing affordable residential housing projects.

The City continues to leverage additional funds separate from the CDBG and HOME programs for the construction of new affordable housing and the rehabilitation of existing housing. ARPA funds are being used to support down payment assistance for new single-family construction as part of the 100 Homes Program. ARPA funds are also being used for an additional rehabilitation program designed for owner and non owner-occupied properties. MSHDA funds were used to support the construction of affordable and visitable homes, and for the rehabilitation of existing homes needing energy efficiency improvements. HOME-ARP funds are being used to support the construction of affordable rental housing and the rehabilitation of existing structures. Finally, the City will utilize HOME funds through homebuyer activities, including but not limited to down payment assistance on new construction single-family homes.

### **Actions planned to reduce lead-based paint hazards**

Inspections of non-owner occupied housing units will continue to assess deteriorated paint and will be 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 will receive a combination lead paint inspection/risk assessment and, if hazards exist, will be 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 planned to reduce the number of poverty-level families**

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* – up to \$25,000 is available through a 5-year, zero-interest, deferred loan with a partial low repayment component to correct emergency hazards from major system failures.
- *Homebuyer New Construction* – currently under development through the City's CHDO, the Greater Jackson Habitat for Humanity. The 2025-2029 5-Year Consolidated Plan further outlines planned down-payment assistance for those earning less than 80% of the area median income.

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.

City leaders will collaborate with the United Way of Jackson County, the Continuum of Care, the Jackson Interfaith Shelter, the Community Action Agency, Habitat for Humanity, the Welcome Home Organization, Residents in Action, Kings Community Homes, and other community service providers in their efforts to reduce the number of impoverished residents.

### **Actions planned to develop institutional structure**

City staff will continue active participation 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 will ensure compliance with federal rules and regulations and the timely expenditure of CDBG funds. The Greater Jackson Habitat for Humanity will receive technical assistance and guidance by various City staff as its new housing construction project proceeds.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

City staff will continue active participation 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.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

#### Introduction:

While similar in many ways, CDBG and HOME are governed under separate federal regulation with certain requirements specific to each grant. The information below addresses those specific requirements.

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	0
5. The amount of income from float-funded activities	0
<b>Total Program Income</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income.	70.00%

**HOME Investment Partnership Program (HOME)  
Reference 24 CFR 91.220(l)(2)**

- 1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:**

Forms of investment beyond those identified in 24 CFR 92.205 will not be utilized under this plan.

- 2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:**

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

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

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

- 3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:**

The City's recapture/resale guidelines for acquired properties are the same as noted above under Paragraph 2.

- 4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:**

Activities in this plan do not include refinancing of existing debt secured by multifamily housing rehabilitated with HOME funds.