

JACKSON

Founded 1829



Before



After

2019 – 2020 Consolidated Annual Performance and Evaluation Report

Department of Neighborhood & Economic Operations



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Attachments:

PR26 – CDBG Financial Summary Report

CR-05 - Goals and Outcomes

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

This 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 2019 – 2020 Annual Action Plan for the period of July 1, 2019 through June 30, 2020. This is the fifth and final CAPER submitted in association with the 2015 – 2019 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 blighting effects through code enforcement or demolition; and improving the suitable living environment in distressed neighborhoods by sustaining public infrastructure and facilities.

Accomplishments during the 2019 – 2020 Program Year were significantly hampered by the coronavirus pandemic. On December 31, 2019, China reported a cluster of pneumonia cases in Wuhan, Hubei Province which led to the eventual identification of a novel coronavirus dubbed COVID-19. Less than one (1) month later, the United States announced its first confirmed coronavirus case in Washington state. By the end of January 2020, the World Health Organization (WHO) declared the outbreak a global health emergency (pandemic) and the White House banned entry for most foreign nationals who had traveled to China within the prior 14 days. On March 13, 2020, President Donald Trump declared a national state of emergency due to the COVID-19 pandemic.

In Michigan, the first two (2) cases of COVID-19 were confirmed on March 10, 2020, prompting Governor Gretchen Whitmer to declare a state of emergency. By March 13, Governor Whitmer banned gatherings of more than 250 people and requested public bodies to postpone their meetings or conduct them remotely. Two (2) weeks later, Governor Whitmer issued Executive Order 2020-21 requiring all individuals living in Michigan to stay at home and for businesses to suspend normal operations except to the extent workers were necessary to sustain or protect life or to conduct minimum basic operations.

Locally, City Hall closed to the public on March 16, 2020 but provided a means for the public to deliver paperwork and payments through a drop box in the anterior lobby. On March 17, 2020, Mayor Derek Dobies declared a local state of emergency as a precautionary measure. Handwashing stations were provided at various locations within the City. On March 23, 2020, all 16 of the City’s playground facilities were closed; however, parks and trails remained open with visitors encouraged to practice social distancing. Upon the issuance of Governor Whitmer’s “stay-at-home” order referenced above, a majority of non-essential City employees began working from home with intermittent, staggered office time or were laid off. City Hall did not open to the public again until July 6, 2020.

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	Strategic Plan			Program Year		
					Expected	Actual	Percent Complete	Expected	Actual	Percent Complete
Acquisition/Rehab/Resale	Affordable Housing		Homeowner Housing Added	Household Housing Unit	0	0	0.0%	5	0	0.00%
Acquisition/Rehab/Resale	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	0	0	0.0%	1	0	0.00%
Acquisition/Rehab/Resale	Affordable Housing		Direct Financial Assistance to Homebuyers	Households Assisted	3	0	0.00%	0	0	0.0%
CHDO - New Construction	Affordable Housing	HOME: \$718,636	Homeowner Housing Added	Household Housing Unit	4	0	0.00%	4	0	0.00%
CHDO Operating Expenses	CHDO Operating Expenses	HOME: \$50,000	Other	Other	n/a	n/a		n/a	n/a	
Code Enforcement	Non-Housing Community Development	CDBG: \$28,700	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	1500	1276	85.07%	300	254	84.67%
Downtown Rental Rehabilitation	Affordable Housing		Rental units constructed	Household Housing Unit	2	5	250.00%	0	0	0.00%
Homeless Prevention - CDBG-CV	Homeless	CDBG-CV: \$426,020	Homelessness Prevention	Persons Assisted	100	0	0.00%	0	0	0.0%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Strategic Plan			Program Year		
					Expected	Actual	Percent Complete	Expected	Actual	Percent Complete
Multi-Family Rehabilitation	Accessible Housing		Homeowner Housing Added	Household Housing Unit	0	0	0.0%	4	0	0.00%
Multi-Family Rehabilitation	Accessible Housing		Other	Other	36	0	0.00%	0	0	0.00%
Public Facilities and Infrastructure Improvements	Non-Housing Community Development	CDBG: \$584,927	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5000	32460	649.20%	600	3840	640.00%
Public Services	Non-Housing Community Development	CDBG: \$21,713	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2000	62	3.10%	500	62	12.40%
Residential Demolition	Non-Housing Community Development	CDBG: \$259,000	Buildings Demolished	Buildings	100	45	45.00%	13	4	30.77%
Residential Rehabilitation	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	50	47	94.00%	10	8	80.00%

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.

Jackson was on track to meet and exceed its timeliness spending requirement until COVID-19 basically nullified the last quarter of the 2019 – 2020 program year. A contract to demolish five (5) residential properties had been awarded at the end of the 2019 calendar year and the contractor was working on asbestos abatement when the project was put on hold. The closing City Hall and the court system lead to the suspension of prosecution and the lay off of staff from the City Attorney’s office. Rehabilitation projects, some of them in process, had to be put on hold until after construction crews were allowed to return to work. Public infrastructure projects were finishing the design phase and materials were being ordered to begin construction once the weather improved sufficiently; projects are now underway but a couple of street reconstruction projects were canceled in their entirety.

Seven (7) CDBG-funded emergency hazard rehabilitation projects were completed during the 2019 program, together with one (1) full rehabilitation project using HOME funds. A full rehabilitation project combining both CDBG and HOME funds began prior to the COVID-19 shutdown and was entering its final phases after close of the fiscal year.

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	6	1
Black or African American	1	0
Asian	0	0
American Indian or American Native	0	0
Native Hawaiian or Other Pacific Islander	0	0
Total	7	1
Hispanic	0	0
Not Hispanic	7	1

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

Narrative

Of the eight (8) households assisted during program year 2019-2020, a total of 15 persons benefited from the assistance. Other notable information includes, but is not limited to, the following:

- One (1) female head of household with four (4) children and two (2) single-headed female households
- Two (2) elderly couples and one (1) elderly single-headed female household
- One (1) single-headed male household
- One (1) married couple with no children at home

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	2,319,416	963,657
HOME	public - federal	581,497	154,507

Table 3 - Resources Made Available

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
n/a	n/a	n/a	n/a

Table 4 – Identify the geographic distribution and location of investments

Narrative

The City of Jackson did not specify a target area in its 2019-2020 Annual Action Plan or through its 2015-2019 Five-Year Consolidated Plan. During the years covered by the 2015-2020 Five-Year Consolidated Plan, City leaders concentrated resources to rejuvenate its downtown core and combat blight in residential neighborhoods. CDBG funds also followed this pathway when appropriate, especially in neighborhoods immediately surrounding the downtown. The focus on combatting blight and rejuvenating the downtown generated the interest of private developers.

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.

The City's 2018-2019 CAPER described several housing developments under construction in the downtown. One project, Francis Street Lofts, received its Certificate of Occupancy on June 29, 2020. The 200 is nearing completion and significant work has been accomplished on the Albert Kahn Apartments, a LITHC project.

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								

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
\$46,077	\$9,277	0	0	\$55,354

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	\$139,710	0	0	0	0	\$139,710
Number	1	0	0	0	0	1
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	\$139,710	0	\$139,710			
Number	1	0	1			
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		1	\$3,550

	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Households Displaced						
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	6	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	6	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	4	0
Number of households supported through Rehab of Existing Units	2	8
Number of households supported through Acquisition of Existing Units	0	0
Total	6	8

Table 12 – Number of Households Supported

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

New members of the City’s rehabilitation staff spent time in HUD trainings, Michigan Community Development Association (MCDA) conferences, and reviewing local policies and procedures. The rehabilitation policies and procedures manual, last updated in 2014, underwent significant changes. Although full rehabilitation remains in the manual, the cost to fully rehabilitate the City’s aged housing stock has become cost prohibitive. To help low-income homeowners remain housed and make that housing affordable to them, the incorporation of a “major components” program was added to the manual. This program allows the City to provide rehabilitation assistance to a homeowner to replace aged major systems, such as a roof, furnace, water heater, etc., before they become an emergency situation. The emergency hazard program remains intact and addresses issues that have escalated to an emergency situation, such as a leaking roof or a non-functioning furnace during the winter months.

Over the years, the City’s rehabilitation program has been able to help fewer and fewer families due to the excessive cost. Instead of trying to correct all code violations which may exist in a home, the focus is now to help 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 in dollars.

Discuss how these outcomes will impact future annual action plans.

Although work to update the rehabilitation policies and procedures manual began during program year 2019-2020, it did not receive approval from City Council until August 11, 2020. Rehabilitation staff anticipates a significant increase in the number of low-income homeowners who will receive assistance during the 2020-2021 program year.

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	3	1
Low-income	0	0
Moderate-income	4	0
Total	7	1

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 20, 2020, 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 their person/family's life where support is most likely necessary to avoid housing instability.

A designated Housing Assessment and Resource Agency 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. 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 2019 PIT count performed by the CoC indicated 84 homeless individuals were documented, an increase of approximately 5.0% from 2018. Of those, 77 were sheltered and 13 were unsheltered. Seven (7) individuals were considered chronically homeless (a decrease of 30.0% from 2018), defined as a single person (or head of household) who experienced four (4) homeless episodes during the previous 12 months; however, all of those persons were sheltered at the time the count was conducted.

The 2019 Housing Inventory Count (HIC) reports 115 year-round beds in shelters for those experiencing homelessness, an increase of 6.5% over the number of beds available in 2018. Forty-seven (47) beds are reserved for households without children and 68 beds are available for households with children. An additional ten (10) beds are available during overflow situations. In addition, the Rapid Re-Housing program reports 76 year-round beds, increasing over 15% from that available in 2018. Permanent Supportive Housing beds also increased from 99 in 2018 to 103 in 2019, or 4.0%.

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 at risk of, homelessness to help identify the best type of support and housing intervention by relying on three (3) categories of recommendation:

- *Permanent Supportive Housing* - individuals or families who need permanent housing with ongoing access to services and case management to remain stably housed;

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

The Coronavirus Aid, Relief, and Economic Security (CARES) Act provided an influx of Emergency Shelter and CoC grant money, among other CARES Act funding, to the Jackson community to address the needs in prevention, preparing for, and responding to COVID-19. As this global pandemic is still ongoing, and increasing at the time of writing this report, the outcomes of CARES Act spending are not fully known and will be tracked for future reporting requirements.

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

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

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

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 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).

With a recent change in the top administration of the City, efforts to enhance a collaborative relationship between the City and the JHC is in process. Due to the COVID-19 shutdown during the last quarter of program year 2019, implementation of the planned changes was delayed until after July 1, 2020. Those changes include the reconstruction of streets exclusively serving Chalet Terrace and deeding the land on which the Asset Management Projects are located to the JHC.

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

Active Resident Advisory Boards are in place at both Reed Manor and Chalet Terrace. Several attempts have been made to initiate a Resident Advisory Board at Shahan but efforts have thus far fallen short of an election as there has been little interest amongst the residents to participate. Another attempt to organize a Resident Board at Shahan will occur within the next six (6) months. Residents are encouraged to attend Board meetings, talk with their housing managers, and even the Executive Director if warranted. 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. The City of Jackson provides each public housing complex hard copies of its Consolidated Plan, Annual Action Plan, and CAPER during public comment periods for resident review and input.

Actions taken to provide assistance to troubled PHAs

The Jackson Housing Commission is not a troubled PHA.

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

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

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

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 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 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.

The onset of COVID-19 and subsequent shutdown diverted attention from progressing with landlord advocacy.

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 onset of COVID-19 and subsequent shutdown delayed the exploration of projects with community service providers to meet underserved needs. However, the CARES Act provided sources and levels of funding in the community to address a variety of urgent needs from keeping families housed to supporting small businesses.

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

According to the Michigan Department of Health and Human Services (MDHHS), environmental exposure to lead in amounts sufficient to cause illness and neurological damage in children remains a significant concern in Michigan. Jackson County has been identified as one (1) of fourteen (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 continues 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 offered services and programs to make housing affordable to its low- to moderate-income homeowners:

- *Rehabilitation* – up to \$75,000 is available through a 20-year, zero-interest, deferred loan with a partial low repayment component (10 years) to correct code violations or emergency hazards.
- *Homebuyer New Construction* – currently under development through the City's CHDO, the Greater Jackson Habitat for Humanity.

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 collaborate with the United Way of Jackson County and other community service providers in their efforts to reduce the number of impoverished residents.

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 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.

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 began regular video conferences with community stakeholders. Among attendees were local health care leaders such as Henry Ford Allegiance Health, the Jackson County Health Department, and the Center for Family Health. The United Way of Jackson County also participated and reported back to the Jackson COVID-19 Action Network (JCAN) it formed to coordinate local non-profits' efforts to address the emerging needs of the community.

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

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

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

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

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

CR-40 - Monitoring 91.220 and 91.230

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

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

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

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

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

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

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

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.

Funds received from the CARES Act allowed City leaders to provide Homeless Prevention assistance in the form of Foreclosure Prevention, Water Shutoff Prevention, and Eviction Protection.

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

No

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)

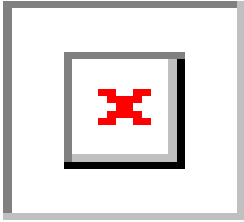
The City of Jackson has not produced rental or homebuyer projects consisting of five (5) or more units.

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 2019-2020, the City received program income in the amount of \$9,277. This program income derived from HOME-funded rehabilitation loans completed during prior years. No program income was expended during 2019-2020.

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

The City of Jackson ensures landlords maintain housing units to decent, safe, and sanitary conditions through a biennial housing inspection process. City administration helps private developers access funding resources that may be available, such as LIHTC. The City's CHDO is in the planning stages to implement a homebuyer project.



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PART I: SUMMARY OF CDBG RESOURCES

01 UNEXPENDED CDBG FUNDS AT END OF PREVIOUS PROGRAM YEAR	1,055,869.43
02 ENTITLEMENT GRANT	1,227,866.00
03 SURPLUS URBAN RENEWAL	0.00
04 SECTION 108 GUARANTEED LOAN FUNDS	0.00
05 CURRENT YEAR PROGRAM INCOME	149,862.91
05a CURRENT YEAR SECTION 108 PROGRAM INCOME (FOR SI TYPE)	0.00
06 FUNDS RETURNED TO THE LINE-OF-CREDIT	0.00
07 ADJUSTMENT TO COMPUTE TOTAL AVAILABLE	0.00
08 TOTAL AVAILABLE (SUM, LINES 01-07)	2,433,598.34

PART II: SUMMARY OF CDBG EXPENDITURES

09 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	942,596.23
10 ADJUSTMENT TO COMPUTE TOTAL AMOUNT SUBJECT TO LOW/MOD BENEFIT	0.00
11 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 09 + LINE 10)	942,596.23
12 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	157,460.19
13 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	0.00
14 ADJUSTMENT TO COMPUTE TOTAL EXPENDITURES	0.00
15 TOTAL EXPENDITURES (SUM, LINES 11-14)	1,100,056.42
16 UNEXPENDED BALANCE (LINE 08 - LINE 15)	1,333,541.92

PART III: LOWMOD BENEFIT THIS REPORTING PERIOD

17 EXPENDED FOR LOW/MOD HOUSING IN SPECIAL AREAS	0.00
18 EXPENDED FOR LOW/MOD MULTI-UNIT HOUSING	0.00
19 DISBURSED FOR OTHER LOW/MOD ACTIVITIES	881,367.20
20 ADJUSTMENT TO COMPUTE TOTAL LOW/MOD CREDIT	0.00
21 TOTAL LOW/MOD CREDIT (SUM, LINES 17-20)	881,367.20
22 PERCENT LOW/MOD CREDIT (LINE 21/LINE 11)	93.50%

LOW/MOD BENEFIT FOR MULTI-YEAR CERTIFICATIONS

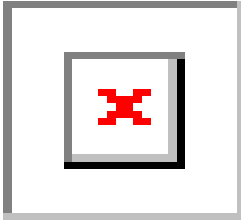
23 PROGRAM YEARS(PY) COVERED IN CERTIFICATION	PY: 2019 PY: PY:
24 CUMULATIVE NET EXPENDITURES SUBJECT TO LOW/MOD BENEFIT CALCULATION	0.00
25 CUMULATIVE EXPENDITURES BENEFITING LOW/MOD PERSONS	0.00
26 PERCENT BENEFIT TO LOW/MOD PERSONS (LINE 25/LINE 24)	0.00%

PART IV: PUBLIC SERVICE (PS) CAP CALCULATIONS

27 DISBURSED IN IDIS FOR PUBLIC SERVICES	21,712.93
28 PS UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	130,479.07
29 PS UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	0.00
30 ADJUSTMENT TO COMPUTE TOTAL PS OBLIGATIONS	0.00
31 TOTAL PS OBLIGATIONS (LINE 27 + LINE 28 - LINE 29 + LINE 30)	152,192.00
32 ENTITLEMENT GRANT	1,227,866.00
33 PRIOR YEAR PROGRAM INCOME	105,489.86
34 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PS CAP	0.00
35 TOTAL SUBJECT TO PS CAP (SUM, LINES 32-34)	1,333,355.86
36 PERCENT FUNDS OBLIGATED FOR PS ACTIVITIES (LINE 31/LINE 35)	11.41%

PART V: PLANNING AND ADMINISTRATION (PA) CAP

37 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	157,460.19
38 PA UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	73,560.79
39 PA UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	22,087.83
40 ADJUSTMENT TO COMPUTE TOTAL PA OBLIGATIONS	(82,219.35)
41 TOTAL PA OBLIGATIONS (LINE 37 + LINE 38 - LINE 39 +LINE 40)	126,713.80
42 ENTITLEMENT GRANT	1,227,866.00
43 CURRENT YEAR PROGRAM INCOME	149,862.91
44 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PA CAP	0.00
45 TOTAL SUBJECT TO PA CAP (SUM, LINES 42-44)	1,377,728.91
46 PERCENT FUNDS OBLIGATED FOR PA ACTIVITIES (LINE 41/LINE 45)	9.20%



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LINE 17 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 17

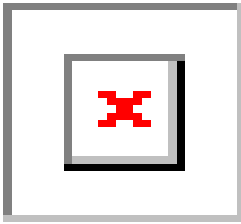
Report returned no data.

LINE 18 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 18

Report returned no data.

LINE 19 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 19

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2017	10	1678	6287096	Bucky Harris Park Improvement	03F	LMA	\$30.00
2017	10	1678	6295959	Bucky Harris Park Improvement	03F	LMA	\$2,735.45
2018	8	1693	6295959	Bucky Harris Park Improvement	03F	LMA	\$385.86
2018	8	1693	6301883	Bucky Harris Park Improvement	03F	LMA	\$690.54
2018	8	1693	6313902	Bucky Harris Park Improvement	03F	LMA	\$857.70
2018	8	1693	6330304	Bucky Harris Park Improvement	03F	LMA	\$870.57
2018	8	1693	6334338	Bucky Harris Park Improvement	03F	LMA	\$30,050.10
2018	8	1693	6342296	Bucky Harris Park Improvement	03F	LMA	\$35,912.04
2018	8	1693	6360029	Bucky Harris Park Improvement	03F	LMA	\$91.50
2018	13	1708	6346578	Park Lighting - Exchange and Loomis	03F	LMA	\$82,085.00
2019	20	1711	6372364	Loomis Park Basketball Court Improvements	03F	LMA	\$6,500.00
					03F	Matrix Code	\$160,208.76
2017	15	1677	6342296	Street Lighting	03K	LMA	\$37,120.20
2017	15	1677	6346576	Street Lighting	03K	LMA	\$55,362.50
2018	5	1690	6295959	Steward St from Wildwood to VanBuren	03K	LMA	\$11,921.20
2018	5	1690	6346576	Steward St from Wildwood to VanBuren	03K	LMA	\$133,294.80
2018	6	1689	6295959	Homecrest from Louis Glick to VanBuren	03K	LMA	\$20,376.82
2018	6	1689	6346576	Homecrest from Louis Glick to VanBuren	03K	LMA	\$31,761.83
2018	7	1685	6346576	Second St: Washington Ave to Washington NW	03K	LMA	\$111,327.08
2019	19	1707	6346576	Street Lighting	03K	LMA	\$27,598.40
2019	19	1707	6372364	Street Lighting	03K	LMA	\$11,891.84
2019	19	1707	6395628	Street Lighting	03K	LMA	\$4,529.67
2019	19	1707	6402476	Street Lighting	03K	LMA	\$9,515.98
2019	23	1713	6372765	Street Reconstruction - Steward: RR to Ganson	03K	LMA	\$1,558.60
2019	23	1713	6395628	Street Reconstruction - Steward: RR to Ganson	03K	LMA	\$8,704.70
2019	23	1713	6402476	Street Reconstruction - Steward: RR to Ganson	03K	LMA	\$13,616.38
					03K	Matrix Code	\$478,580.00
2019	2	1694	6364819	King Center Summer Youth Program - 2019	05D	LMC	\$18,832.08
					05D	Matrix Code	\$18,832.08
2019	4	1696	6364819	Loomis Park Playground Program	05L	LMC	\$2,880.85
					05L	Matrix Code	\$2,880.85
2015	2	1655	6364819	HOMEOWNER REHABILITATION	14A	LMH	\$719.93
2015	2	1655	6367953	HOMEOWNER REHABILITATION	14A	LMH	\$15,219.45
2016	2	1712	6364819	Homeowner Residential Rehabilitation	14A	LMH	\$60.00
2016	2	1712	6367953	Homeowner Residential Rehabilitation	14A	LMH	\$21,769.31
2018	2	1686	6287096	Residential Emergency Hazard	14A	LMH	\$9,627.00
2018	2	1686	6310309	Residential Emergency Hazard	14A	LMH	\$7,389.00
2018	2	1686	6318868	Residential Emergency Hazard	14A	LMH	\$180.00
2018	2	1686	6322432	Residential Emergency Hazard	14A	LMH	\$206.65
2018	2	1686	6326441	Residential Emergency Hazard	14A	LMH	\$150.00
2018	2	1686	6330304	Residential Emergency Hazard	14A	LMH	\$14,200.00
2018	2	1686	6334338	Residential Emergency Hazard	14A	LMH	\$241.02
2018	2	1686	6342296	Residential Emergency Hazard	14A	LMH	\$33,497.74
2018	2	1686	6346576	Residential Emergency Hazard	14A	LMH	\$13,440.00
2018	2	1686	6387368	Residential Emergency Hazard	14A	LMH	\$690.13
2018	2	1686	6395628	Residential Emergency Hazard	14A	LMH	\$13,497.83
					14A	Matrix Code	\$130,888.06



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Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2016	2	1652	6305656	Denied Loans- CDBG (2016)	14H	LMC	\$344.66
2016	2	1652	6310309	Denied Loans- CDBG (2016)	14H	LMC	\$264.66
2016	2	1652	6330304	Denied Loans- CDBG (2016)	14H	LMC	\$21.25
2017	2	1682	6301883	Rehabilitation Adminstration	14H	LMH	\$7,577.20
2017	2	1682	6305656	Rehabilitation Adminstration	14H	LMH	\$1,750.18
2017	2	1682	6310309	Rehabilitation Adminstration	14H	LMH	\$1,749.01
2017	2	1682	6313902	Rehabilitation Adminstration	14H	LMH	\$2,170.92
2017	2	1682	6318868	Rehabilitation Adminstration	14H	LMH	\$3,243.79
2017	2	1682	6322432	Rehabilitation Adminstration	14H	LMH	\$1,761.48
2017	2	1682	6326441	Rehabilitation Adminstration	14H	LMH	\$4,168.03
2017	2	1682	6330304	Rehabilitation Adminstration	14H	LMH	\$2,199.47
2017	2	1682	6334338	Rehabilitation Adminstration	14H	LMH	\$1,812.85
2017	2	1682	6342296	Rehabilitation Adminstration	14H	LMH	\$3,622.79
2017	2	1682	6346576	Rehabilitation Adminstration	14H	LMH	\$1,768.80
2017	2	1682	6351239	Rehabilitation Adminstration	14H	LMH	\$1,893.25
2017	2	1682	6355963	Rehabilitation Adminstration	14H	LMH	\$2,008.72
2017	2	1682	6360029	Rehabilitation Adminstration	14H	LMH	\$1,992.80
2017	2	1682	6364819	Rehabilitation Adminstration	14H	LMH	\$8,852.94
2017	2	1682	6367953	Rehabilitation Adminstration	14H	LMH	\$2,487.08
2017	2	1682	6372364	Rehabilitation Adminstration	14H	LMH	\$1,537.63
2017	2	1682	6376197	Rehabilitation Adminstration	14H	LMH	\$1,279.55
2017	2	1682	6379949	Rehabilitation Adminstration	14H	LMH	\$4,188.62
2017	2	1682	6383039	Rehabilitation Adminstration	14H	LMH	\$3,975.09
2017	2	1682	6387368	Rehabilitation Adminstration	14H	LMH	\$3,152.96
2017	2	1682	6392475	Rehabilitation Adminstration	14H	LMH	\$3,937.31
					14H	Matrix Code	\$67,761.04
2018	3	1683	6301883	City Attorney - Code Enforcement	15	LMA	\$2,829.82
2018	3	1683	6305656	City Attorney - Code Enforcement	15	LMA	\$1,978.50
2018	3	1683	6310309	City Attorney - Code Enforcement	15	LMA	\$1,855.24
2018	3	1683	6326441	City Attorney - Code Enforcement	15	LMA	\$2,508.71
2018	3	1683	6342296	City Attorney - Code Enforcement	15	LMA	\$3,382.26
2018	3	1683	6351239	City Attorney - Code Enforcement	15	LMA	\$1,135.65
2018	3	1683	6360029	City Attorney - Code Enforcement	15	LMA	\$2,557.90
2018	3	1683	6372364	City Attorney - Code Enforcement	15	LMA	\$1,783.71
2018	3	1683	6395628	City Attorney - Code Enforcement	15	LMA	\$1,235.53
2019	7	1703	6395628	Code Enforcement - Legal Services	15	LMA	\$2,949.09
					15	Matrix Code	\$22,216.41
Total							\$881,367.20

LINE 27 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 27

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2019	2	1694	6364819	King Center Summer Youth Program - 2019	05D	LMC	\$18,832.08
					05D	Matrix Code	\$18,832.08
2019	4	1696	6364819	Loomis Park Playground Program	05L	LMC	\$2,880.85
					05L	Matrix Code	\$2,880.85
Total							\$21,712.93

LINE 37 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 37

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2017	1	1681	6301883	PLANNING AND ADMINSTRATION	21A		\$5,275.88
2017	1	1681	6305656	PLANNING AND ADMINSTRATION	21A		\$1,430.05

