

# JACKSON

Founded 1829

Community Development Block Grant  
HOME Investment Partnerships Program  
**2021-2022 Annual Action Plan**



*Before*

*After*

## Boos Center, Loomis Park

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# Executive Summary

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

### 1. Introduction

The City of Jackson presents this Annual Action Plan for the second year of its 2020 – 2024 Five-Year Consolidated Plan and covers the period of July 1, 2021 through June 30, 2022, also referred to as Program Year (PY) 2021 or Fiscal Year (FY) 2021. PY 2021 represents the City's 47<sup>th</sup> consecutive year to receive a Community Development Block Grant (CDBG) formula allocation as an entitlement community and 30<sup>th</sup> year to receive a HOME Investment Partnerships Program (HOME) formula allocation as a participating jurisdiction.

### 2. Summarize the objectives and outcomes identified in the Plan

*This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic 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. – to the greatest extent possible. The number of funded activities will remain low in an effort to increase their effectiveness which will include Public Facilities/Infrastructure Improvements, Code Enforcement, Residential Demolition, and homebuyer activities of rehabilitation or new construction through the City's Community Housing Development Organization (CHDO).

### 3. Evaluation of past performance

*This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.*

Performance in Program Year 2019 was significantly impacted during its last quarter due to COVID-19 and emergency orders issued by Governor Gretchen Whitmer which shutdown the state for months and suspended construction projects. Construction projects suspended beginning in March 2020 delayed the City's ability to meet its CDBG timeliness requirement for 2019. However, upon re-engagement of construction and the state slowly loosening restrictions, suspended projects finished quickly early in the 2020 fiscal year. The City met its 2020 timeliness requirements by the end of January 2021.

### 4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

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 26, 2021 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.

City Council received the draft copy of the Annual Action Plan on March 23, 2021 and was then made available for public review and comment on March 24, 2021. 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 27, 2021. Citizens are also able to express concerns or comments at any time during the year before City Council meetings or by contacting grant staff.

## **5. Summary of public comments**

*This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.*

At the January 26, 2021 public hearing, comments were received to develop of Fair Choice Housing ordinance, create more affordable and accessible housing, condition of current housing, emergency shelters, lower taxes, fix roads, relocate college to County Fairgrounds, and eviction reform.

Comments regarding the Annual Action Plan to be determined.

## **6. 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. City Council is working on a Fair Chance Housing ordinance.

## **7. 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, Councilmembers, City Manager, and department heads on matters that concern them. The ongoing pandemic led to holding council meetings virtually with citizens encouraged to email comments to the City Clerk for reading on the record. Meetings are shown live on a local public access television station, JTV, which also replays the meetings at various other times throughout the week and are available through the City's Facebook page.

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.

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

### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

*Describe the agency/entity 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	Neighborhood & Economic Operations
HOME Administrator	JACKSON	Neighborhood & Economic Operations

**Table 1 – Responsible Agencies**

### Narrative (optional)

Staff in the City’s Department of Neighborhood & Economic Operations (NEO) 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 subgrantee 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

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

### **1. Introduction**

**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(l))**

The City’s Grant Coordinator participates in monthly Continuum of Care (CoC) meetings and previously served as co-chair for the CoC and as the Jackson Housing Commission’s President of the Board of Commissioners. 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.

**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 for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and 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.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities**

<p><b>1 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>
<p><b>2 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>

<p>3 <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>
<p>4 <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	<b>Agency/Group/Organization</b> <b>Agency/Group/Organization Type</b>	Kate Martin Works Housing PHA Services: housing, children, elderly persons, persons with disabilities, victims of domestic violence, homeless, health, education, employment, fair housing, victims
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs: chronically homeless, families with children, Veterans, unaccompanied youth Non-Homeless Special Needs Market Analysis
	<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, direct consultation, email consultation.
6	<b>Agency/Group/Organization</b> <b>Agency/Group/Organization Type</b>	AWARE, Inc Housing Services: housing, children, victims of domestic violence, homeless, health, education, employment, victims
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - families with children Non-Homeless Special Needs Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participation in CoC, email consultation.

7	<b>Agency/Group/Organization</b> <b>Agency/Group/Organization Type</b>	Jackson Interfaith Shelter Housing Services: housing, children, homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs: chronically homeless, families with children, veterans, unaccompanied youth
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participation in CoC
8	<b>Agency/Group/Organization</b> <b>Agency/Group/Organization Type</b>	Legal Services Of South Central Michigan Housing Services: housing, children, elderly persons, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, homeless, health, fair housing, victims
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	<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, direct consultation, email consultation.

9	<b>Agency/Group/Organization</b> <b>Agency/Group/Organization Type</b>	disAbility Connections Housing Services-Persons with Disabilities
	<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
10	<b>Agency/Group/Organization</b> <b>Agency/Group/Organization Type</b>	Department of Health & Human Services Housing Services: housing, children, elderly persons, persons with disabilities, victims of domestic violence, health Health Agency Child Welfare Agency Other government - State
	<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**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Community Action Agency	The CoC works to support homeless individuals and families work toward self-sufficiency.
Five-Year Plan	Jackson Housing Commission	Five-year plan of the local Public Housing Authority which overlaps in multiple areas relating to the housing needs of the low-income community.
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 (CEDs)	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.

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

## **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 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, through its social media outlets, 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, listed on the City's website, and through its social media outlets. 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/social media outlets, 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/social media outlets. 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
1	Public Hearing	Minorities  Persons with disabilities  Non-targeted/broad community  Residents of Public and Assisted Housing	Due to limitations imposed by the ongoing pandemic, the public hearing was held virtually before the Jackson City Council on January 26, 2021. Citizens were encouraged to provide written comment to the City Clerk to be read on record at the hearing.		
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.
4	Jackson District Library Carnegie Branch	Minorities  Persons with disabilities  Non-targeted/broad community	Hard copy of Annual Action Plan made available in the Resource Center for public review and comment.	No written comments were received.	No written comments were received.

<b>Sort Order</b>	<b>Mode of Outreach</b>	<b>Target of Outreach</b>	<b>Summary of response/attendance</b>	<b>Summary of comments received</b>	<b>Summary of comments not accepted and reasons</b>
5	Jackson Housing Commission	Minorities  Persons with disabilities  Residents of Public and Assisted Housing	Hard copy of 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 Annual Action Plan made available in CAA's lobby for public review/comment.	No written comments were received.	No written comments were received.
7	Jackson County Continuum of Care	Service Providers	Members were notified of every upcoming step in the citizen participation process and encouraged to attend the public hearing and/or submit comments relative to the Consolidated Plan.		See public hearing 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 type. Estimated revenue for fiscal year 2021–2022 is as follows:

- **CDBG:** 2020-21 formula allocation: \$1,284,968; less 3% (-\$38,500); plus estimated program income (\$75,200) = \$1,321,668
- **HOME:** 2020-21 formula allocation: \$317,039; less 3% (-\$9,500); plus estimated program income (\$20,200) = \$327,739

On February 25, 2021, HUD published the 2021-2022 formula allocations, establishing the City of Jackson’s fiscal year budgets as noted below. The Jackson City Council, in turn, established projects, activities, and funding levels for the 2021-2022 program year as identified in this Annual Action Plan.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of ConPlan
			Annual Allocation:	Program Income:	Prior Year Resources:	Total:	
CDBG	Federal	Acquisition, Admin and Planning, Economic Development, Housing, Public Improvements, Public Services	\$1,292,730	\$75,200	0	\$1,367,930	\$3,375,332
<b>Narrative Description:</b>		Annual block grant from HUD based on a formula to address a variety of community development and housing needs, primarily benefiting low- to moderate-income City residents.					
HOME	Federal	Acquisition, Homebuyer assistance, Homeowner rehab, Multifamily rental new construction, Multifamily rental rehab, New construction for ownership, TBRA	\$314,129	\$20,200	0	\$334,329	\$818,186
<b>Narrative Description:</b>		Annual grant from HUD based on a formula to provide affordable housing to low- to moderate-income City residents.					

**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 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 tax auction 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 provide the impetus for an affordable housing collaboration. The Greater Jackson Habitat for Humanity will use these parcels to construct up to four (4) new single family homes as the City's Community Housing Development Organization (CHDO) for sale to income qualified homeowners when completed. The project location is immediately south of the downtown which has experienced growth and revitalization and will neighbor a new Y Center planned to begin construction in 2021. While the pandemic delayed the start and possible extent of this project as originally planned, Habitat is moving forward to start new construction in the near future.

Under new leadership since early 2020, City Administration is reassessing its need to continue amassing tracts of land. The City presently owns 44 residential houses it acquired through tax reversion over eight (8) years and is allowing these residential properties to be purchased by responsible investors to fix and resell on the open market. Staff is also working with Habitat to rehabilitate a select few of these homes as its CHDO to resell to qualified homebuyers upon completion.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Category	Needs Addressed	Funding
1	Public Facilities/Infrastructure	Non-Housing Community Development	Street Reconstruction Park Improvements	CDBG: \$1,092,930
2	Residential Demolition	Clearance and Demolition	Residential Demolition	CDBG: \$ 75,000
3	Code Enforcement (legal)	Non-Housing Community Development	Code Enforcement	CDBG: \$ 20,000
4	CHDO Reserve	Affordable Housing	Homebuyer Housing	HOME: \$ 318,329

**Table 6 – Goals Summary**

#### Goal Descriptions

<b>1</b>	<b>Goal Name</b>	Public Facilities/Infrastructure
	<b>Goal Description</b>	Like all communities in Michigan, public infrastructure is difficult to maintain due to high cost and lack of funding mechanisms. City leaders have responded to public outcry over local street conditions and insufficient street lighting in higher crime neighborhoods to the best of its ability with limited funding. These projects will continue and will be conducted with other utility upgrades to combine as many resources to the greatest extent feasible, limiting the potential financial impact to residents through special assessments. Loomis Park, a popular neighborhood amenity, is being assessed for upgrades to its playground equipment and the rehabilitation needs of its much used community center.

2	<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.
3	<b>Goal Name</b>	Code Enforcement (legal)
	<b>Goal Description</b>	Legal support to the Department of Neighborhood & Economic Operations in its efforts to improve low-income neighborhoods and properties through blight enforcement.
4	<b>Goal Name</b>	CHDO Reserve
	<b>Goal Description</b>	Habitat for Humanity holds several years' worth of CHDO reserves with the original intent of a multi-phased new construction/neighborhood project called DeLand Pointe. Various issues related to the ongoing COVID-19 pandemic caused Habitat to reassess the extent of the project and to possibly include rehabilitation of City-owned houses acquired through tax reversion for eventual sale to qualified homebuyers. In 2006, the Community Action Agency (CAA) also constructed 16 homes in Partnership Park with LIHTC funds. The intent of these new constructions was to rent for a number of years with eventual sale to a qualified homebuyer. As these units become vacant, CAA would also serve as a CHDO by using HOME funds to meet the rehabilitation needs of these homes to make suitable for qualified homebuyers.

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

The City of Jackson is funding projects to achieve the goals and objectives defined in the 2020-2024 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 are now expanding assistance into the adjoining neighborhoods. The initial phase will focus on street reconstruction, clearance of severely dilapidated residential structures, and homeowner 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	Street Reconstruction
2	Loomis Park / Boos Center Improvements
3	Code Enforcement – Legal Services
4	2021 Residential Demolition
5	Rehabilitation Administration
6	General Administration/Planning
7	Community Housing Development Organization (CHDO) Reserve

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 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 funds 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>	Street Reconstruction
	<b>Target Area</b>	West of Henry Ford Allegiance Health
	<b>Goals Supported</b>	Public Facilities/Infrastructure
	<b>Needs Addressed</b>	Public Facilities/Infrastructure
	<b>Funding</b>	CDBG: \$576,000
	<b>Description</b>	Reconstruct the pavement and curbs, replace water mains and lead service lines where needed.
	<b>Target Date</b>	11/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1,985 low- to moderate-income residents
	<b>Location Description</b>	Census Tract 11, Block Group 2; Census Tract 69, Block Group 3, located in Local Target Area 1 (West of Henry Ford Allegiance Health)
	<b>Planned Activities</b>	Cooley Place: Morrell Street to Biddle Street Biddle Street: Mechanic Street to South Martin Luther King Jr. Dr. Perrine Street: Michigan Avenue to Burr Street Burr Street: Perrine Street to State Street
<b>2</b>	<b>Project Name</b>	Loomis Park / Boos Center Improvements
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Facilities/Infrastructure
	<b>Needs Addressed</b>	Public Facilities/Infrastructure
	<b>Funding</b>	CDBG: \$516,930

	<b>Description</b>	The rehabilitation needs of the Boos Center, a much loved and well-used neighborhood community center, are currently under assessment and will be prioritized by need. A new playground system just outside the Boos Center may also be replaced to improve the safety and accessibility for all residential children in the area.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Loomis Park is located in the middle of Census Tract 4, Block Group 5. According to the 2019 Low/Mod Income Summary Data (LMISD), the percentage of low- to moderate-income residents in this area is 50%. The park's service area is not limited to Census Tract 4, Block Group 5; in fact, it is a very popular recreation destination for residents in the one-half mile surrounding area. The one-half mile radius around Loomis Park includes all five (5) Block Groups in Census Tract 4; Census 12, Block Groups 2 and 3; and Census Tract 69, Block Groups 1 and 3. When combined, this area is 61.11% low- to moderate-income residents. Approximately 4,950 low- to moderate income persons reside within a one-half mile radius of Loomis Park.
	<b>Location Description</b>	The address for the Boos Center is 210 Gilbert Street, Jackson, MI.
	<b>Planned Activities</b>	Rehabilitation of the Boos Center based on priority needs identified through an architectural/engineering assessment, and replacement of the playground outside the Boos Center to improve the safety and accessibility for neighborhood children.
<b>3</b>	<b>Project Name</b>	Code Enforcement - City Attorney's Office
	<b>Target Area</b>	
	<b>Goals Supported</b>	Code Enforcement (legal)
	<b>Needs Addressed</b>	Code Enforcement (Legal)
	<b>Funding</b>	CDBG: \$20,000
	<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>	6/30/2021

	<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>4</b>	<b>Project Name</b>	2021 Residential Demolition
	<b>Target Area</b>	
	<b>Goals Supported</b>	Residential Demolition
	<b>Needs Addressed</b>	Residential Demolition
	<b>Funding</b>	CDBG: \$75,000
	<b>Description</b>	Demolition of foreclosed, vacant, or abandoned residential properties within CDBG-eligible areas across the City.
	<b>Target Date</b>	6/30/21
	<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 five (5) 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>5</b>	<b>Project Name</b>	Rehabilitation Administration
	<b>Target Area</b>	Not applicable
	<b>Goals Supported</b>	Not applicable
	<b>Needs Addressed</b>	Rehabilitation Administration

	<b>Funding</b>	CDBG: \$65,000
	<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>	Not applicable
	<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>6</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: \$115,000 HOME: \$ 16,000
	<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>	Not applicable
	<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>7</b>	<b>Project Name</b>	CHDO Reserve Activity
	<b>Target Area</b>	
	<b>Goals Supported</b>	CHDO Reserve
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$318,329
	<b>Description</b>	The actual activity of either New Construction or Homebuyer Rehabilitation will be determined in the future.
	<b>Target Date</b>	
	<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>	

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

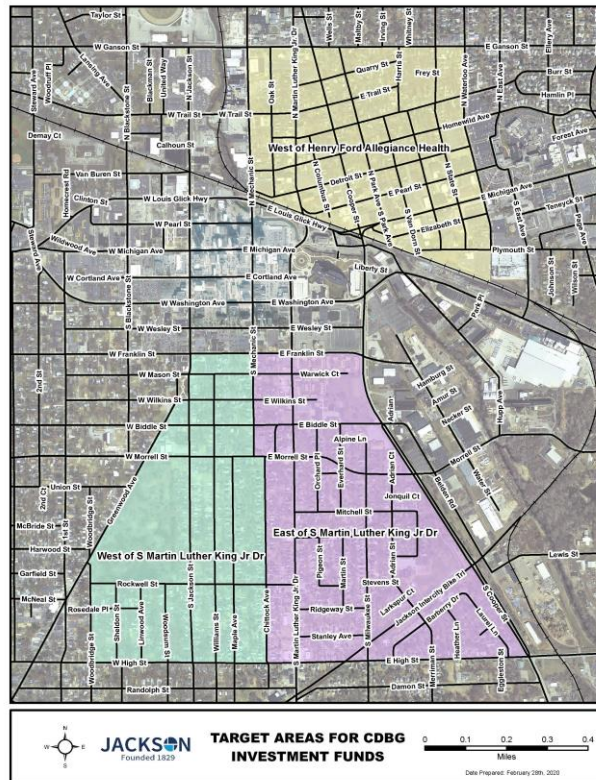
### Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The 2020-2024 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.

**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. No major commercial business is located in the neighborhood.

**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.



## Geographic Distribution

Target Area	Percentage of Funds
West of Henry Ford Allegiance Health	10%
East of S Martin Luther King Jr Dr	10%
West of S Martin Luther King Jr Dr	10%

**Table 8 - Geographic Distribution**

## Rationale for the priorities for allocating investments geographically

The public reinvestment in the City of Jackson has concentrated on revitalizing the heart of the city – its downtown business district. With revival well on its way, investment in the residential neighborhoods immediately adjacent to the downtown is in order to build on the beautification and blight reduction efforts. The percentage of low- to moderate-income residents in these targeted areas ranges from 60.1% to 87.1%. 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 likely presence of lead-based paint, fully rehabilitating owner-occupied housing has become cost prohibitive, hindering the City’s ability to provide assistance. In August 2020, the Jackson City Council approved a new rehabilitation option for low-income homeowners to ensure it preserves as much of the predominately single-family homes as possible while improving energy efficiency, thereby making more hard earned income available to low-income persons.

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 share a majority of its annual HOME funds with its CHDO, the Greater Jackson Habitat for Humanity, to increase the number of new, affordable homebuyer options. Habitat will also rehabilitate select City-owned residential properties it acquired through the tax reversion process.

For the first time, the City will also fund a second CHDO – Community Action Agency (CAA) – to rehabilitate 16 homes built in 2006 with LIHTC funding. Located in Partnership Park, the homes were financed as 15 year rent-to-own properties. CAA will refresh these properties through rehabilitation to prepare them for income-qualified homebuyers.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	20
Special-Needs	0
Total	20

**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	2
Rehab of Existing Units	18
Acquisition of Existing Units	0
Total	20

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

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

### **Introduction**

The Jackson Housing Commission (JHC) has served as the City’s Public Housing Authority (PHA) for 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**

Efforts to improve the relationship between the City of Jackson and the JHC has been on-going; recent administration changes within the City has renewed and reinvigorated those efforts. On October 27, 2020, the Jackson City Council approved deeding the land on which the three (3) Asset Management Projects are located to the JHC, allowing the JHC to successfully receive a Rental Asset Management (RAD) award to preserve and improve the public housing properties.

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

### **Actions 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-Blackstone North but efforts have thus far fallen short. The most recent attempt was less than six (6) months ago - an election took place and first meeting held; however, it disbanded after the first meeting. A new housing manager is in place dedicated to just Shahan (the previous housing manager had to split time with Chalet Terrace) and 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.

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 opportunity 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 not a troubled agency.

## 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, 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.

### 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.

- **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.

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

### **Introduction:**

Conversations with local housing providers reveal 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 spoiled as part of a domestic violence situation.
- Rejection of service animals in the unit.
- Refusal to accept Housing Choice Vouchers or charging rents that don't qualify for fair market rent.
- People who are routinely discriminated against often don't notice or identify discrimination. If discrimination is suspected, the tenants are often more interested in finding housing to meet their immediate need rather than going through a lengthy appeal process.

### **Actions 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 participate with the CoC in developing 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.

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

### **Introduction:**

The projects and activities identified in this 2021-2022 Annual Action Plan coincides with the goals and priorities identified in the 2020-2024 Five-Year Consolidated Plan.

### **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**

The City assists low-income homeowners with housing maintenance and emergency repairs through zero interest, low repayment loans. In addition, the City's CHDOs construct new single family homes and/or rehabilitate housing units for resale to qualifying low-income households.

### **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 it low-to moderate-income homeowners:

- *Rehabilitation* – up to \$25,000 is available through five (5) year, zero-interest, deferred loans with a partial low repayment component. Eligible homeowners receive assistance to address emergency hazards or upgrade major components nearing the end of their life cycle before they become emergencies.
- *Homebuyer New Construction* – currently under development through the City's CHDO, the Greater Jackson Habitat for Humanity. Newly constructed single family homes will be sold to income qualified homebuyers.
- *Homebuyer Rehabilitation* – Habitat and Community Action Agency will both rehabilitate housing for eventual resale to income qualified homebuyers.

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 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. Technical assistance is available to agencies receiving grant funds to aid in conformance.

### **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
Total Program Income	0

#### 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%

Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.

**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 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 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 any 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.