

THE CITY OF



# **Community Planning and Development**

**FY 2016 One-Year Action Plan**

**City of Kalamazoo  
Community Development Block Grant Program  
HOME Investment Partnerships Program  
&  
Emergency Solutions Grant**

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*Adopted by the Kalamazoo City Commission on – April 4, 2016  
Submitted to HUD on: May 6, 2016*

*Prepared by Staff of the City of Kalamazoo Community Planning  
and  
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**THE CITY OF KALAMAZOO  
ACTION PLAN  
JULY 2016 – JUNE 2017**

**The City of Kalamazoo  
City Commissioners - Update**

Mayor Bobby J. Hopewell

Vice Mayor - Don Cooney

David Anderson

Erin Knott

Matt Milcarek

Shannon Sykes

Jack Urban

**Community Planning & Development**

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## Executive Summary

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

#### 1. Introduction

The City of Kalamazoo is an entitlement jurisdiction receiving federal funds from the U.S. Department of Housing and Urban Development (HUD). The activities described in the FY 2016-17 Action Plan are a result of goals and strategies outlined in the city's 2014-2018 Consolidated Plan. The FY 2016-17 Action Plan is based on priorities established by the City of Kalamazoo to address the housing and community development needs of its low and moderate income families and individuals. The Plan is a prerequisite for the distribution of HUD funding. Administrative and planning support for the City will be provided through the Community Planning and Development Department for the five years of the Plan. The budget for the 2016-2017 year is as follow:

### PY2016 Action Plan - Funding Recommendations Sources and Uses

Agency	Activity Name	Requested Funding	Funding Recommendation	AMOUNT
<b>SOURCES</b>				
	CDBG Allocation		1,487,874	
	CDBG Prior Year Unallocated		62,998	
	CDBG Anticipated Program Income		94,893	
	HOME Allocation		422,450	
	ESG Allocation		138,353	
<b>Total Funds Available</b>				<b>2,206,568</b>
<b>USES</b>				
<b>CDBG PUBLIC SERVICE<sup>1</sup></b>				
City of Kalamazoo Public Safety	Crime Prevention		\$150,000	
City of Kalamazoo CPD	Neighborhood Support		\$20,000	
Fair Housing Ctr SW Michigan	Fair Housing Services		\$20,000	
Local Initiatives Support Corp	Continuum of Care		\$20,000	
<b>Total</b>				<b>210,000</b>
<b>CDBG ADMINISTRATION<sup>2</sup></b>				
City of Kalamazoo	Administration			<b>297,575</b>
<b>CDBG - GENERAL</b>				
City of Kalamazoo	Code Enforcement		\$425,000	
<b>City of Kalamazoo</b>	Demolition		\$58,017	
City of Kalamazoo	Parks and Recreation		\$25,907	
<b>Total</b>				<b>508,924</b>
<b>CDBG - AFFORDABLE HOUSING</b>				
Housing Resources, Inc.	Tenant Based Rental Assistance - Admin	\$75,000	\$56,375	
Senior Services, Inc.	Home Repair for the Elderly	\$100,000	\$75,000	

Community Homeworks	Emergency Home Repair	\$250,000	\$200,000	
<b>Total</b>		<b>\$425,000</b>		<b>331,375</b>
<b>*CDBG Neighborhood Enhancement</b>				
City of Kalamazoo Public Services			\$202,998	
				<b>202,998</b>
<b>CDBG Total</b>				<b>1,550,872</b>

<b>PROGRAM INCOME</b>				
City of Kalamazoo CP&D	Small Business Revolving Loan		\$15,000	
Kzoo Neighborhood Housing Services	Minor/Emergency Roof Repair		\$57,900	
Community Homeworks	Minor/Emergency Roof Repair		\$21,993	
<b>Total</b>				<b>94,893</b>

<b>HOME</b>				
City of Kalamazoo CP&D	Administration <sup>3</sup>		\$42,245	
Fair Housing of SW Michigan	Property Redevelopment for Homeownership	\$400,000	\$70,637	
Housing Resources, Inc.	Tenant Based Rental Assistance	\$100,000	\$75,200	
College Town Properties	Rehabilitation of Rental Units	\$71,000	\$71,000	
Kalamazoo Collective	Rehab of Vacant Properties for Rental	\$100,000	\$100,000	
Unallocated HOME Funds	CHDO Reserve		\$63,368	
<b>Total</b>		<b>\$671,000</b>		<b>422,450</b>

<b>ESG</b>				
Continuum of Care	Cost to administer the ESG program <sup>4</sup>		\$10,378	
Continuum of Care	Various Homeless Programs and Activities		\$127,975	
<b>Total</b>				<b>138,353</b>

<b>ALL PROGRAMS TOTAL</b>				<b>2,206,568</b>
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1Public Services activities are subject to a 16% cap

2 CDBG Planning and Administrative services are subject to a 20% cap

3HOME administration is subject to a 10% cap

4ESG administration is subject to a 7.5% cap

**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.**

In 2014, the City of Kalamazoo adopted the 2014-2018 Consolidated Plan that outlines the framework for the City to target CDBG funds for the highest community development needs. The Consolidated Plan goals and objectives were developed through the *Needs Assessment*, data analysis and evaluation, consultations with area agencies, and citizen input.

The City developed its 2016-2017 objectives and outcomes based upon citizen participation and the needs identified in the 2014-2018 Consolidated Plan.

The City proposes to use 2016 entitlement funds in fiscal year (FY) 2016-2017 to continue neighborhood revitalization and housing rehabilitation continue to reduce homelessness, provide public assistance, parks and recreational repairs, and further fair housing. The 2016- 2017 Action Plan objectives and outcomes are further described below:

**Table 2 – Objectives and Outcomes**

<i>Affordable Housing</i> - Improve the amount of decent and affordable housing in the City of Kalamazoo by supporting the maintenance, rehabilitation and development of accessible owner and renter occupied housing.			
<b>Category</b>	<b>Agency</b>	<b>Indicator</b>	<b>Expected Program Year</b>
Affordable Housing:	Fair Housing	Fair housing activities for Low/Moderate Income Housing Benefit	73845
Affordable Housing:	College Town Properties	Rental units rehabilitated	6 Housing units
	Kalamazoo Collective Housing		<u>6 Housing units</u> <b>12 Housing units</b>
Affordable Housing:	Fair Housing Center of Southwest Michigan(HOME)	Homeowner Housing Added	1 Housing units
Affordable Housing:	Community Homeworks Senior Services	Homeowner Housing Rehabilitated	80 Housing Units 32 Housing units
Affordable Housing:	Housing Resources Inc.	Tenant-based rental assistance / Rapid Rehousing	55 Housing units
<i>Homeless Assistance</i> - Work towards ending homelessness within Kalamazoo County by supporting the U.S. Department of Housing and Urban Development’s Strategic Plan to Prevent and End Homelessness implemented through the Kalamazoo County Continuum of Care by providing services and support to the City’s homeless population.			
<b>Category</b>	<b>Agency</b>	<b>Indicator</b>	<b>Expected Program Year</b>
<i>Homeless Assistance:</i>	Housing Resources Inc.	Homeless Person Overnight Shelter	149 Persons Assisted

<i>Homeless Assistance:</i>	Housing Resources Inc.	Homelessness Prevention	126 Persons Assisted
<i>Neighborhood Enhancement</i> - Advance the sustainability of the Community Development Block Grant neighborhoods identified in the Consolidated Plan through the continuation of City services and redevelopment of key neighborhood improvements.			
<b>Category</b>	<b>Agency</b>	<b>Indicator</b>	<b>Expected Program Year</b>
<i>Neighborhood Enhancement:</i>	City of Kalamazoo	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit –	73845
<i>Neighborhood Enhancement:</i>	City of Kalamazoo	Public service activities other than Low/Moderate Income Housing Benefit –	28884
<i>Neighborhood Enhancement:</i>	City of Kalamazoo	Buildings Demolished	5
<i>Neighborhood Enhancement:</i>	City of Kalamazoo	Housing Code Enforcement/Foreclosed Property Care	1109
<i>Youth Development</i> - Develop well-adjusted and productive adults through supporting youth programs and activities that provide positive experiences and opportunities to enhance interests, skills and abilities into adulthood.			
<b>Category</b>	<b>Agency</b>	<b>Indicator</b>	<b>Expected Program Year</b>
Youth Development	City of Kalamazoo	Public service activities other than Low/Moderate Income Housing Benefit	0

HUD has identified a series of outcomes to be achieved through the application of the resources it provides. The primary outcomes that will be achieved as the City provides funding for and/or carries out activities during FY 2016-17 will include improving the availability, accessibility and affordability of housing, and creating or enhancing suitable living environments. Detailed descriptions of the foregoing priority needs, goals, and anticipated outcomes can be found in the Consolidated Plan document, available on the City's Web site at: <http://www.kalamazoo.org/community-development2>.

### 3. Evaluation of past performance

#### Monitoring

The City regularly monitors progress on activities carried out in the Annual Action Plan to ensure compliance with program requirements. Evaluation takes place during the application and funding process, and after sub-grantee contracting has been executed. Agreements with sub-agreements and Memoranda of Understandings (MOUs) with other public agencies set clear performance measures, reporting procedures, timeliness, and budgets against which goals are measured. City staff regularly monitors compliance with contracting requirements and performance goals through the implementation and review of quarterly performance reports, monthly reimbursement desk audits, and annual on-site monitoring. City staff provides feedback to sub-grantees regarding areas of concern, and findings where corrective action or improvements are required. The City publishes an Annual Performance Report, aggregating data to analyze progress towards goals, cost effectiveness, community impact, and compliance with regulations. Additional Monitoring Standards and

Procedures are outlined in the City of Kalamazoo Consolidated Plan. Contracting standards and policies and procedures can also be found in the City's CDBG Policies and Procedures Manual. Information obtained from all of the aforementioned evaluation and monitoring efforts is used to assist in the determination of which projects to allocate CDBG funds.

#### Past Performance

The following were the major achievements reported in the latest Consolidated Annual Performance and Evaluation Report which covered the period of July 1, 2014 to July 30, 2015:

**Table - 3**

<b>Category</b>	<b>Agency</b>	<b>Indicator</b>	<b>Units Served</b>
<b>Affordable Housing: CDBG</b>	Fair Housing	Public service activities for Low/Moderate Income Housing Benefit	98 Housing units
<b>Affordable Housing: HOME</b>	NACD	Rental units constructed	0 Housing units
<b>Affordable Housing: HOME</b>	Urban Alliance	Rental units rehabilitated	2 Housing units
<b>Affordable Housing: HOME</b>	KNHS	Homeowner Housing Added	4 Housing units
<b>Affordable Housing: CDBG</b>	Community Homeworks Senior Services KNHS Urban Alliance	Homeowner Housing Rehabilitated	139 Housing units
<b>Affordable Housing: HOME</b>	HRI	Tenant-based rental assistance / Rapid Rehousing	81 Housing units
<b>Homeless Assistance: ESG</b>	HRI	Homeless Person Overnight Shelter	209 Persons Assisted
<b>Homeless Assistance: ESG</b>	HRI	Homelessness Prevention	177 Persons Assisted
<b>Neighborhood Enhancement: CDBG</b>	City of Kalamazoo	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	73845
<b>Neighborhood Enhancement: CDBG</b>	City of Kalamazoo	Public service activities other than Low/Moderate Income Housing Benefit	28884
<b>Neighborhood Enhancement: CDBG</b>	City of Kalamazoo	Buildings Demolished	3
<b>Neighborhood Enhancement: CDBG</b>	City of Kalamazoo	Housing Code Enforcement/Foreclosed Property Care	1109
<b>Youth Development</b>	City of Kalamazoo	Public service activities other than Low/Moderate Income Housing Benefit	340

#### 4. Summary of Citizen Participation Process and consultation process Summary from citizen participation section of plan.

The City of Kalamazoo followed its published Citizen Participation Plan in carrying out the process used to develop this FY 2016-17 Action Plan. The City Commission opens a 30 day comment period to gather input from the community at-large. After the comment period, a public hearing is held by the Community Development Act Advisory Committee and then by the City Commission. The notices of the public comment period and public hearings are posted in the local newspaper and on the City's webpage. In addition, the dates are emailed to all of the applicants who submitted a request for funding for the 2016 Program Year. The plan is available on the City's website.

In practice the citizen participation process under which the City's Consolidated Plan and this FY 2016-17 Action Plan began many years ago, as prior Consolidated Plans were implemented. Since 2000, each year's Action Plan hearing has been advertised as an opportunity to influence the next Consolidated Plan and its priorities; many identified actions in earlier Plans were intended to help the City define or refine goals for future plans. As noted above, the citizen participation process for this Action Plan combined formal public hearings with less formal meetings and discussions about needs and solutions. The goals in the City's FY 2014-2018 Consolidated Plan are reflective of a comprehensive, additive approach to gathering public input. The actions the City will carry out or support through implementation of its FY 2016-17 Action Plan are a direct result of the discussions in which City staff have participated, and of the ideas and testimony the City received through its more formal processes.

#### **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.**

The City completed outreach to local nonprofits, stakeholder organizations, neighborhood groups, residents, community funders, housing providers, and community leaders who access public services. A wide array of comments was provided at these meetings and through the Community Needs Survey. This input provided the foundation for the development of the priorities, goals and objectives of the plan.

Comments were also received during the 30-day public comment period and at the Community Development Act Advisory Committee and City Commission public hearings. For the PY2016 Annual Action Plan, the 30-day public comment period was held from **February 23, 2016 through March 22, 2016**. One sub recipient expressed concerns during the comment period regarding the scoring and funding recommendation their agency received. These concerns were expressed to the City Manager's office and Community Development and Planning staff. CDAAC held the first public hearing on March 10, 2016. Staff relayed the sub-recipient's concerns to CDAAC. There were no other comments received by staff or CDAAC and no attendees at the CDAAC public hearing. CDAAC voted unanimously to approve the Action Plan with changes to budget as a result of the lowered HUD allocation.

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

All comments were accepted. However, the City established a process of evaluating public input to ensure an outcome of a focused set of priorities and goals that would address the most urgent needs and not duplicate efforts. Through this review process, some input garnered prior to the public hearings was considered and ruled out in favor of priorities, goals and objectives presented in the this plan.

## 7. Summary

The 2016-2017 Action Plan outlines the activities the City of Kalamazoo will undertake or support during the one-year period, beginning July 1, 2016, to address identified community needs. Consistent with the current Consolidated Plan, the impact of any federal funds received by the City will be maximized through a focused approach of addressing community needs and delivering services to the low and moderate income residents of Kalamazoo. The goals and objectives of the Plan will improve overall.

### ***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.

**Table -4**

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
Lead Agency	KALAMAZOO	City of Kalamazoo
CDBG Administrator	KALAMAZOO	Community Planning and Development
HOME Administrator	KALAMAZOO	Community Planning and Development
ESG Administrator	KALAMAZOO	Community Planning and Development

**Table 2 – Responsible Agencies**

#### **Narrative (optional)**

The lead entity for the administration of CDBG, HOME, and ESG programs is the City of Kalamazoo through the Department of Community Planning and Development. As the lead agency, the City is responsible for overseeing the development and implementation of the 2014-2018 Consolidated Plan, Annual Action Plans and Consolidated Annual Performance Evaluation Reports. Community Planning and Development staff provides administrative and planning support for the use of the federal funds and acts as the primary staff support to the Community Development Act Advisory Committee. The Community Development Act Advisory Committee is a 13 member board that is appointed by the City Commission to advise on matters related to community development, make recommendations on the expenditure of funds through an annual competitive process, assist with the development of HUD related documents, ensure citizen participation in all phases of the federal allocation process and to promote community development activities within the City.

#### **Consolidated Plan Public Contact Information**

City of Kalamazoo contact for Consolidated Plan, Action Plan, CDBG Program, HOME Program:

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

### **1. Introduction**

As the lead agency, the City of Kalamazoo, through Community Planning and Development, oversaw the consultation required to complete the 2014-2016 Consolidated Plan. Community Planning and Development staff collaborated with a wide network of community services and housing providers, clients of those providers, government officials, business leaders, neighborhood representatives and residents. Information was gathered in a number of ways which included a Community Needs Survey, stakeholder and neighborhood meetings, outreach at established community events and provider meetings. The outcome of the Consolidated Plan represents the information collected from this collaboration, as well as from public comment and public hearing opportunities.

The City engages in ongoing consultation with local service providers, community leaders, the public, and other community development partners. Consultation includes correspondence with area agencies, attendance at local and regional meetings and committees, outreach by City Commissioners and public meetings. The City also consults with other City departments to identify public facility and community development needs.

Activities to enhance coordination between public and assisted housing providers, governmental health, mental health, and service agencies is ongoing. Specific meetings with housing and mental health providers to identify needs for the 2016-2017 Action Plan include:

1. Service Needs – Communication by reports from existing CDBG Subrecipients and outreach to other agencies to assess needs and programs.
2. Housing Matters - Monthly forum is intended to educate those in attendance on existing affordable housing programs or issues related to housing and offer opportunities to discuss possibilities for creating additional housing throughout the County.
3. Community Hour - Housing Resources, Inc., – monthly meetings with local agencies that work together to address the needs of Kalamazoo’s homeless and at-risk populations.

### **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 coordinates with and participates in the county-wide Continuum of Care (CoC); this collaboration of more than 30 constituent groups, helps to create a comprehensive and integrated approach to end homelessness and insure permanent housing for low-income people.

The City works with CoC partners and agency volunteers who represent public and assisted housing providers and private and governmental health, mental health and service agencies by serving on the following CoC committees and boards, including:

- The Allocations and Accountability Team (AAT) includes City staff as member) meets monthly and maintains an open, fair, and impartial process for the solicitation of projects, project selection for funding and establishes CoC policies, procedures and written standards.

- HMIS Data User Group (Data Team) meets monthly and insures the Homeless Management Information System (HMIS) complies with the HUD standards. This program, is used by all HUD and MSHDA funded-programs, and is able to produce aggregate reporting at the community level.
- Systems of Care (SOC) Committee: Meets bi-monthly and identifies and eradicates barriers that prevent or limit access to housing and services, with interagency collaboration, strength-based case management, cultural competence, community-based services, family involvement, and accountability as guiding principles.
- Co-Chairs Work Group: Provides long-term strategic planning that addresses the needs of homeless; the availability and accessibility of existing housing and services; and the opportunities for linkages with mainstream housing and service resources.
- LISC Local Advisory Board (LAB): Meet bi-monthly, serves as the CoC's governing body and establishes the policy and process to ensure the submission of the competitive application(s) for state and federal Homeless Assistance funding available through the HEARTH Act. The City of Kalamazoo's Deputy City Manager serves on the LAB.
- Semi-Annually, community-wide CoC meetings are also held in the City.

The CoC provides notice of the meetings through a variety of venues including email distribution lists, announcement at CoC committee meetings, through the LISC Local Advisory Board (LAB), and postings on the CoC website. Email lists are inclusive of a broad range of community partners both CoC members, formerly homeless and non-members. Additionally, housing professionals participate in the affiliated LISC Community Housing Committee that considers and provides feedback about community needs and initiatives and CoC activities and plans.

**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 Continuum of Care has a 10-year plan to end chronic homelessness and yearly action plans that assist with strategic decision making regarding program outcomes. In 2016, the Allocations & Accountability Team (CoC committee with City staff member) and the CoC Board approved three CoC policies that expanded previous "guiding principles" and provide written standards for specific programs, projects and activities that address the needs of homeless persons including:

- i. Prioritization of Permanent Housing Beds for the Chronically Homeless*
- ii. Policy Advocating Community Housing First Principles*
- iii. Policy on Rapid Re-Housing Principles*

The policy for Prioritization of Permanent Housing Beds for the Chronically Homeless, addresses, in detail, how CoC permanent housing beds as prioritized to serve the chronically homeless and other homeless with higher acuities.

Additionally, the following CoC organizations address the needs of homeless individuals and families, families with children, veterans, and unaccompanied youth:

Catholic Family Services has five distinct programs: the Ark Shelter is a short term emergency shelter serving youth 10-17, the Ark Community Services & Street Outreach program providing transitional living services to youth 16-21 from nine counties, the Caring Network program for pregnant women and their families, Baraga Manor a 48 unit housing complex for older and mobility impaired adults, and Bridges Mental Health Counseling providing mental health counseling to individuals and families.

Housing Resources Inc., operates the Eleanor House Rapid Re-Housing Center-a 24 bed facility serving homeless families with children. HRI also operates the 49-unit Rickman House that provides permanent housing and supportive services for previously chronically homeless, mentally ill single adults. They also own and operate three family housing developments with a total of 249 affordable housing units.

Kalamazoo Community Mental Health & Substance Abuse Services (KCMHSAS) serves individuals and families through person/family centered planning to persons within the priority populations as defined in the Michigan Mental Health Code including: persons with serious mental illness; addictive disorders; children with severe emotional disturbances; and persons with developmental disabilities. The range of programs available includes Crisis Residential Placement, Respite Services, Assertive Community Treatment, Club House Programs, Assessment and Evaluation, Medication Administration, Skill Building Assistance, Substance Abuse Services and Case Management.

The YWCA offers victims of domestic violence and their dependent children a secure on-site shelter (52 bed capacity), counseling, referral and advocacy services for residential and non-residential clients, and two intensive post-shelter programs (Families First and Transitional Supportive Housing) that address the ongoing housing needs of clients and their children.

Volunteers of America provides supportive Services for Veteran Families (SSVF) funding and support and contacts veterans with other housing options at the VA Center in nearby Battle Creek.

Other local agencies including MI Works, Goodwill Services, Salvation Army, Lutheran Family Services, CARES (Housing Opportunities for Persons with Aids), Ministry with Community participate in the CoC and provide valuable resources for homeless and vulnerable households.

**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 Continuum of Care (MI-507 Portage/Kalamazoo City and County CoC) was instrumental in the development of the City of Kalamazoo's 2014-2018 Consolidated Plan. In conjunction with a comprehensive communitywide planning process and implementation strategy known as, "Open Doors," a 10-Year Plan to End Homelessness, the Emergency Solutions Grant (ESG) program, offers financial assistance to organizations that serve the homeless.

The CoC and the City of Kalamazoo Community Planning & Development Department combine their Emergency Solutions Grants (ESG), funded by the United States Department of Housing & Urban Development (HUD) and the Michigan State Housing Development Authority (MSHDA), into a single local application process.

The City's consultation with the CoC 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, develop funding, policies and procedures for the operation and administration of HMIS to include:

- City Administrative and Community Development staff are appointed to permanent seats on the CoC's governing body, LISC's Local Advisory Board (LAB), and the Allocations & Accountability Team (AAT CoC Committee); this enables the City to interact with agencies that work to end homelessness and the development of strategies and goals of the Continuum of Care.
  - The LISC Local Advisory Board (LAB) approves the ESG Local Application Form (LAF), scoring guidance and grant schedule. The LAB appointed Allocations and Accountability Team (AAT) establishes CoC policies and procedures and meets to review aggregated information from the LAF and HMIS and makes agency funding recommendations to the LAB for approval. The LAB approves the final ESG allocations levels for each agency.
- The City of Kalamazoo utilizes a Sub recipient Agreement with ESG service providers to determine overall performance by receipt of monthly accomplishment reports and meeting annual outcomes detailed in their Agreement.
- A Performance Tracking System to help sub recipients meet their monthly, bi-annual, and yearly goals. The submission of quarterly HMIS reports and data to be reviewed by the Allocations and Accountability and Data Teams.

All agencies serving or intending to serve Kalamazoo County residents experiencing homelessness or those at risk of becoming homeless, and are eligible according to the Notice of Funding Availability's (NOFA) and the Grantor's defined rules, are encouraged to apply for funding. The ESG Notice of Funding Availability (NOFA) is distributed by email to more than 100 "Community Partners" and is posted in the local newspaper and on the CoC Web-Site.

In order for an agency to be selected for funding, they must be able to illustrate that their organization:

1. Will abide by the ESG NOFA, the ESG/MSHDA Policies and Procedures and all adopted CoC policies.
2. Adopted the 10-year Plan to End Homelessness at the board level.
3. Understands that they cannot discriminate (CoC Fair Housing Policy) or require clients to participate in any religious activities (CoC Funding Policies and Procedures).
4. Participates in HMIS data entry through Service Point and is participating in the community-wide QSOBAA to allow sharing within HMIS.
5. Designated a "Navigator", who works to eliminate barriers to housing services by participating in the Systems of Care Team.

6. At least one member of the organization has been an active member of the CoC; and has attended at least 50% of the team meetings for which they are members (if new applicant, will attend 50% of the team meetings for which they become members).
7. Have demonstrated capacity for sound financial, program management; and
8. Are in compliance with all federal, state and local programs for which they receive funding.

The CoC priorities for funding are, but not limited to, the following:

1. **Ensure emergency housing needs are met.**
2. **Adoption of proven tools to prevent and end homelessness:** Use of a comprehensive community-based prevention and rapid re-housing systems that embrace Progressive Engagement and Housing First activities.
3. **Promote program models:** With successful measureable outcomes that are supported by data.
4. **Break down silos:** Collaborate and coordinate across the CoC to ensure that local, state, and federal resources are used effectively and efficiently to end homelessness.
5. **Re-align Programs:** Work as a community to re-align program dollars to keep people housed or to rapidly re-house them.
6. **Build Public Support and Political will for ending homelessness** by sharing data and best practices with mayors, county officials, schools, and other interested parties.
7. **Data collection, analysis, and reporting:** Collect and analyze data via the Homeless Management Information System (HMIS); (Domestic Violence Agencies use alternative systems.) Staff is trained on entering data and how to share data with referral organizations.
8. **Implement Continuous Quality Improvement** and at a minimum the performance measure outcomes as required and outlined in quarterly progress reports;
9. **Use of shelter beds and transitional housing only when necessary and with a Housing First approach;** i.e. shelter diversion;
10. **Collaborate within the Interagency Service Teams** (Systems of Care Committee and Navigators) **to assist the hardest to serve.**

The CoC adopted the HUD developed system-level performance measures to help communities gauge their progress in preventing and ending homelessness. In addition to the Local Application Form, agency, project and HMIS data related to these performance measures are considered by the AAT and LAB when recommending and approving funding including;

1. Length of time persons remain homeless;
2. The extent to which persons who exit homelessness to permanent housing destinations return to homelessness;

3. Number of homeless persons;
4. Jobs and income growth for homeless persons in CoC Program-funded projects;
5. Number of persons who become homeless for the first time;
6. Successful housing placement.

The Continuum of Care also has an evaluation monitoring process to determine whether agencies are performing satisfactorily and effectively addressing homeless needs. Attention is also given to grantees rate of spending, consistency with designated Emergency Solution Grant goals and data entry quality.

**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**

**Table 5 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	<b>Senior Services</b>
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City has ongoing consultation with Senior Services through work on individual projects. This consultation has and will continue to provide direction for needed services and outreach.
2	<b>Agency/Group/Organization</b>	<b>Fair Housing Center of Southwest Michigan</b>
	<b>Agency/Group/Organization Type</b>	Housing Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City works with the Fair Housing Center of Southwest Michigan to carry out fair housing training activities for area landlords and tenants. Fair Housing provides complaint data. This consultation has and will continue to provide direction for future fair housing training, outreach and testing.
4	<b>Agency/Group/Organization</b>	<b>Kalamazoo Valley Habitat for Humanity</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Economic Development Lead-based Paint Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City has ongoing consultation with Kalamazoo Valley Habitat through work on individual projects. In addition, agency participated in the 2016 HUD Roundtable to discuss City needs surrounding healthy homes, youth and economic development. This consultation has and will continue to provide direction for needed services and outreach.
5	<b>Agency/Group/Organization</b>	<b>Local Initiative Support Corporation</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City has ongoing consultation with Kalamazoo Valley Habitat through work on individual projects. In addition, agency participated in the 2016 HUD Roundtable to discuss City needs surrounding healthy homes, youth and economic development. This consultation has and will continue to provide direction for needed services and outreach.
6	<b>Agency/Group/Organization</b>	<b>Community Homeworks</b>
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Economic Development Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City has ongoing consultation with Community Homeworks through work on individual projects. In addition, agency participated in the 2016 HUD Roundtable to discuss City needs surrounding healthy homes, youth and economic development. This consultation has and will continue to provide direction for needed services and outreach.

7	<b>Agency/Group/Organization</b>	<b>Urban Alliance</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Homeless Needs - Chronically homeless Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	UA participated in the 2016 HUD Roundtable to discuss City needs surrounding health homes, youth and economic development. This consultation has and will continue to provide direction for needed services and outreach.
8	<b>Agency/Group/Organization</b>	<b>Kalamazoo Neighborhood Housing Services</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City has ongoing consultation with KNHS through work on individual projects. In addition, agency participated in the 2016 HUD Roundtable to discuss City needs surrounding healthy homes, youth and economic development. This consultation has and will continue to provide direction for needed services and outreach.
9	<b>Agency/Group/Organization</b>	<b>Kalamazoo Community Mental Health</b>
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities Services-homeless Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency participated in 2016 HUD Roundtable to discuss City needs surrounding healthy homes, youth and economic development.
10	<b>Agency/Group/Organization</b>	<b>Vine Neighborhood Association</b>
	<b>Agency/Group/Organization Type</b>	Housing Neighborhood Organization

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City meets quarterly with the Vine Neighborhood Association to address community needs. This consultation has and will continue to provide direction for needed services and outreach. In addition, this association participated in the 2016 HUD Roundtable to discuss City needs surrounding healthy homes, youth and economic development.
11	<b>Agency/Group/Organization</b>	<b>MSHDA</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency participated in the 2016 HUD Roundtable to discuss City needs surrounding healthy homes, youth and economic development. This consultation has and will continue to provide direction for needed services and outreach.
12	<b>Agency/Group/Organization</b>	<b>Edison Neighborhood Association</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City meets quarterly with the Edison Neighborhood Association to address community needs. This consultation has and will continue to provide direction for needed services and outreach. In addition, this association participated in the 2016 HUD Roundtable to discuss City needs surrounding healthy homes, youth and economic development.
13	<b>Agency/Group/Organization</b>	<b>Northside Neighborhood Association Community Development</b>
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City meets quarterly with the NCAD to address community needs. This consultation has and will continue to provide direction for needed services and outreach.

Identify any Agency Types not consulted and provide rationale for not consulting - N/A

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

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Local Initiatives Support Corporation	Share common outcomes

**Table – 6 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**

Community Planning and Development met monthly with the Community Development Act Advisory Committee (CDAAC), which is comprised of citizen representatives from the six core low/mod neighborhoods and four at-large city representatives. Each of these representatives shared opportunities offered by the city with their neighborhoods organizations and in-turn shared community concerns and needs as reflected in the city's 2014/2018 Consolidated Plan. Information shared heavily impacted the development of the 2016/2017 Action Plan due to current needs continue to reflect the five year Consolidated Plan.

**Table - 7. Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Neighborhood Meetings	Minorities  Non-English Speaking - Specify other language: Spanish  Persons with disabilities  Non-targeted/broad community  Residents of Public and Assisted Housing	Neighborhood meetings were held monthly and opened to the public. Representatives from the communities were present and engaged.	CDAAC areas of discussions resulted in feedback addressing the following: lack of affordable housing, homeless needs, poverty, economic development and the need for more youth programs.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Hearing	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p>	<p>Two public hearings were held (March 10th &amp; April 4th) which followed the City's 30 day public comment period and welcomed continued input from the community regarding the Action Plan. The action plan posted for public comment mimics CP&amp;D 2014/2018 Consolidated Plan and the needs addressed by the community through CDAAC for the 2016/2017 year.</p>	<p>Citizens voiced support for the City's drafted Action Plan to provide funding for the following areas: lack of affordable housing, homeless needs, economic development and the need for more youth programs.</p>	<p>There were no comments that were not accepted.</p>	

## Expected Resources

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

#### Introduction

Each year the City of Kalamazoo is required to submit an Action Plan to HUD. The intent of the plan is to identify how federal grant funds received by the City will be utilized during that program year to address the priority needs acknowledged in the City's Consolidated Plan. Program Year (PY) 2016 Annual Action Plan (July 1, 2016 through June 30, 2017) represents the second program year in which to address the needs identified in the City of Kalamazoo's 2014 - 2018 Consolidated Plan, approved by the Kalamazoo City Commission on May 19, 2014.

The Action Plan constitutes the City's application to HUD for its Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG) funding allocations, which are the primary resources for addressing Kalamazoo's housing and community development needs. The City expects to receive approximately **\$2,127,607** in PY2016 funding through the **CDBG (\$1,487,874)**, **HOME (\$422,450)**, and **ESG (\$138,353)** federal entitlement grants. The City and its Subrecipients will also utilize approximately **\$94,893 in anticipated program income** in PY2016. The City has unallocated CDBG funds from prior years in the amount of **\$62,997.62** to be allocated in FY 2017. The complete available budget to include unallocated funds for **PY2016 totals \$2,206,568**.

The Community Planning and Development Department will also report, to the extent possible, on other resources expected to be used in ways consistent with the Consolidated Plan. This includes both funds and resources of other organizations and agencies, local nonprofits, and for-profits which address the housing and community development needs of the City and its residents.

Decisions about the annual allocation of federal resources is based upon the 2014 - 2018 Consolidated Plan, which was developed after a thorough public participation process conducted both informally with community partners, stakeholders, neighborhood organizations and residents and formally via public hearings. The priorities, goals and objectives outlined in the Consolidated Plan were developed based on the feedback received during this public process, as well as the evaluation of housing, homeless, special needs population, and other relevant community development data.

Based on the analysis of needs and the input received, the City's priority needs and expected resources for 2016 are as follows:

**Table Priority - 8 Expected Resources - Priority Table**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				Expected Amount Available Reminder of ConPlan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public - Federal	· Administration · · Housing Rehabilitation · · Minor/Emergency Home Repair · · Support of TBRA · · Support Fair Housing · · Public infrastructure improvements · · Code Enforcement · · Crime Prevention · · Transformative Neighborhood Projects · · Youth programming	\$ <b>1,487,897</b>	\$ <b>94,893</b>		\$ <b>1,582,790</b>	\$ <b>3,817,587</b>	These funds will leverage City dollars through public infrastructure investment and other City services. In addition, other local, state, and federal funds will be leveraged by City sub recipients for housing activities.

ESG	Public - Federal	· Administration support for Continuum of Care · Prevention · Rapid Re-Housing · Shelter Operational Support · Supportive services	\$ <b>138,353</b>	\$ -	\$ -	\$ <b>138,353</b>	\$ <b>252,745</b>	The Continuum of Care will leverage City funds with other HUD ESG funding
HOME	Public - Federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$ <b>422,450</b>			\$ <b>422,450</b>	\$ <b>288,162</b>	HOME dollars will leverage additional HOME funds from other local funders, MSHDA and federal sources

Table 1 – 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**

Often, additional resources are leveraged by our Subrecipients and partners to complete a project. These leveraged funds often come from the State of Michigan through the Michigan State Housing Development Authority or through foundations like the Kalamazoo Community Foundation. However, these funds are not known until the Subrecipient submits an application through the City's competitive application process.

Community Development Block Grant funds will leverage additional resources as follows:

- Public Infrastructure projects will be supported with additional City and State infrastructure dollars.
- Code enforcement, crime prevention and youth services will leverage additional City general fund dollars. Subrecipients of the City will leverage Michigan State Housing Development Authority and other State funds, as well as nongovernmental funding to expand the scope of rehabilitation assistance.

HOME Investment Partnership Funds will leverage additional public and private investment:

Homeownership investment will be supported by other agencies such as the Michigan State Housing Development Authority and community foundation grants.

- Rental projects may leverage additional funding from HUD; the Federal Home Loan Bank programs; the application of Low Income Housing Tax Credits; private equity investment, private construction and acquisition financing; and other private sources.
- HOME match requirements will be achieved through the donation of property, labor and materials, as well as payments in lieu of taxes for affordable housing developments in the City.

Emergency Solutions Grant funding will leverage additional investment as follows:

- The Kalamazoo County Continuum of Care receives approximately \$1.8 million in grant funding from HUD and approximately \$300,000 from the Michigan State Housing Development Authority each year.
- City Subrecipients also receive grants from funders like The United Way and other nongovernmental organizations. Match requirements will be met through these funders.

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

No publicly owned land will be utilized.

**Discussion**

**Annual Goals and Objectives**

**AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)  
Goals Summary Information**

**AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)  
Goals Summary Information**

**Table - 9 Goals and Objectives**

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2014	2018	Affordable Housing	City-wide low-income households  CDBG-Eligible Census Tracts	Rehabilitation of Existing Units Rental Assistance	CDBG: \$331,375 HOME: \$422,450	Rental units rehabilitated: 12 Household Housing Unit  Homeowner Housing Added: 1 Household Housing Unit  Homeowner Housing Rehabilitated: 112 Household Housing Unit  Tenant-based rental assistance: 41Households Assisted

2	Homeless Assistance	2014	2018	Homeless	City-wide low-income households	Rapid Re-Housing Home less Prevention	ESG: \$138,353	Homeless Person Overnight Shelter: 149 Persons Assisted  Homelessness Prevention: 126 Persons Assisted
3	Neighborhood Enhancement	2014	2018	Non-Housing Community Development (NE, Demolition, Code, Parks & Rec)	CDBG-Eligible Census Tracts	Public Improvements/Infrastructure Public Services	CDBG: \$711,299	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 28884 Persons Assisted Public service activities other than Low/Moderate Income Housing Benefit: 28884 Persons Assisted Buildings Demolished: 7 Buildings Housing Code Enforcement/Foreclosed Property Care: 300 Household Housing Unit

4	Youth Development	2014	2018	Non-Homeless Special Needs	City-wide low-income households  CDBG-Eligible Census Tracts	Public Services	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted
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**Table 1 – Goals Summary**

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):**

A total of 153 families/households are planned to be assisted with housing during FY 2016-2017 (41 renters and 112 homeowners). All households benefitting are extremely- low, low, or moderate income. The 41 rental units and 112 homeowners will be assisted under the CDBG, HOME and ESG programs. The criteria established by the City of Kalamazoo for households to benefit under this program conforms to the CDBG and HOME Program affordability requirements.

## AP-35 Projects – 91.220(d)

### Introduction

The City of Kalamazoo continues to conduct meetings to address its goals and needs. Goals and needs addressed are either carried out by the City or through one of its Subrecipient nonprofit partners.

**Table - 10** Project Information

#	Project Name
1	CDBG Planning and Administration
2	Code Enforcement
3	Demolition
4	Fair Housing Activities
5	Public Facility & Infrastructure
6	Public Safety - Neighborhood Officers
7	The Frank B. Lay Historical Residence
8	Critical Home Repair
9	TBRA - Administration
10	Home Repair for the Elderly
11	LISC Continuum of Care
12	Tenant Based Rental Assistance (TBRA)
13	Lease Purchase
14	Kalamazoo Collective Housing

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

The reasons for allocation priorities results from the City of Kalamazoo completing an extensive outreach process as part of the development of the 2014-2018 Consolidated Plan. This outreach was evaluated against the data collected for the plan; the realities that the City must consider when determining priorities like yearly budgets, staff capacity, etc.; and, what other funders are doing in the community. Based on this evaluation, a set of priorities were established and these priorities were vetted by the Community Development Act Advisory Committee and adopted by the City Commission as part of the 2014-2018 Consolidated Plan.

Obstacles to addressing underserved needs are due to the reduction of financial resources, which results in decreased staff and less funding to local nonprofit providers. Kalamazoo continues to experience a number of obstacles in helping those most in need. More innovative and creative partnerships and funding schemes will need to be considered as these obstacles, particularly funding, are likely to continue.

The need for permanent affordable supportive housing continues to be a concern for persons experiencing homelessness and other special needs populations. The gap between the number of affordable units and those in need continues to be significant for the City and the region.

The development of new affordable housing, particularly with supportive services, is a goal of the Continuum of Care. Partnerships with the City of Kalamazoo, local nonprofit housing providers and Michigan State Housing Development Authority, is needed to develop an affordable housing

strategy. The City will continue to invest in affordable housing through both the CDBG and HOME grant programs.

Providing services, particularly housing, to the chronically homeless continues to be a challenge in Kalamazoo. The small numbers of people with complex, unmet needs who experience homelessness are frequent users of shelters and emergency health care. They often have long histories of homelessness and untreated or poorly managed mental illnesses and addictions. Their frequent stays in county or city jails, shelters, hospitals, etc. result in extraordinarily high costs in multiple public systems, but fail to improve the outcomes for the individuals or their communities.

To have a more proactive approach to homeless prevention, the Continuum of Care developed the Systems of Care team. They established work groups to address the needs/barriers of those that may become homeless. The team works to promote the adoption of evidence-based and promising program practices in support of a Housing First philosophy of care. They prioritize Continuous Quality Improvement in service delivery and educate and inform members on national and community best practices.

In general, the City, particularly the Department of Community Planning and Development, are making an effort to strengthen its relationship with county partners. The Kalamazoo County Department of Health and Community Services houses the Kalamazoo County Community Action Agency, which provides programs and services to help low income households achieve greater economic self-sufficiency. Working towards intergovernmental cooperation could result in joint community development projects, data sharing and best practices.

**Projects**

**AP-38 Projects Summary**

**Project Summary Information**

**Table - 11 Project Summaries**

<b>1</b>	<b>Project Name</b>	<b>CDBG Planning and Administration</b>
	<b>Target Area</b>	City-wide low-income households
	<b>Goals Supported</b>	Affordable Housing Homeless Assistance Neighborhood Enhancement Youth Development
	<b>Needs Addressed</b>	Administration of Programs
	<b>Funding</b>	CDBG: \$297,575
	<b>Description</b>	The CP&D Department will utilize the 20% percent cap available from the entitlement funding for management, monitoring and coordination of CDBG Activities.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	There is population of approximately 75,548 residing in the City of Kalamazoo of a non-low/mod and low-mod status will benefit from proposed activity.
	<b>Location Description</b>	415 Stockbridge Avenue Kalamazoo, MI 49001
	<b>Planned Activities</b>	Administration of the CDBG program for the 2016 program year to include: monitoring, reporting, technical assistance, etc.

2	<b>Project Name</b>	<b>Code Enforcement</b>
	<b>Target Area</b>	CDBG-Eligible Census Tracts
	<b>Goals Supported</b>	Neighborhood Enhancement
	<b>Needs Addressed</b>	Rehabilitation of Existing Units
	<b>Funding</b>	CDBG: \$425,000
	<b>Description</b>	The CP&D Department will fund Housing Inspectors and Anti-Blight staff who work in the CDBG-eligible Census Tracts to reduce slum and blight.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The Code Enforcement and Anti-Blight teams work within the CDBG-eligible neighborhoods to reduce the instances of slum and blight in these neighborhoods. There is a population of approximately 26,329 living in the six core (Eastside, Edison, Stuart/ Douglass, Northside, Southside, and Vine) neighborhoods. Approximately 68 percent of these households have incomes at 80 percent or less of the area median income and approximately 43.1 percent live below the federal poverty line.
	<b>Location Description</b>	The activities will take place in the 1.00, 2.01, 2.02, 3.00, 5.00, 6.00, 9.00, 10.00 and 11.00 Census tracts.
<b>Planned Activities</b>	The City's Code Enforcement and Anti-Blight Team will contribute to the quality of owner housing in the City through their enforcement efforts in the CDBG-eligible neighborhoods. The team will manage the following type of activities: abandoned residential structure cases; secure and board structures open to casual entry; condemn structures; work with the Building Board of Appeals; issue graffiti violations conduct inspections and enforcement of dangerous structures or dilapidated structures, structures found open to casual entry, trash and junk on private property, curb lawn trash, zoning violations, tall grass/weeds, and graffiti.and general blight.	
3	<b>Project Name</b>	<b>Demolition</b>
	<b>Target Area</b>	CDBG-Eligible Census Tracts
	<b>Goals Supported</b>	Neighborhood Enhancement
	<b>Needs Addressed</b>	Neighborhood Improvements
	<b>Funding</b>	CDBG: \$58,017
	<b>Description</b>	Spot blight demolition of approximately 5 vacant/blighted residential structures in eligible CDBG neighborhoods.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	There is a population of approximately 26,329 living in the six core CDBG-Eligible Census Tracts (Eastside, Edison, Stuart/ Douglass, Northside, Southside, and Vine) neighborhoods. Approximately 68 percent of these households have incomes at 80 percent or less of the area median income and approximately 43.1 percent live below the federal poverty line that will benefit from this proposed activity.

	<b>Location Description</b>	The activities will take place in the 1.00, 2.01, 2.02, 3.00, 5.00, 6.00, 9.00, 10.00 and 11.00 Census tracts.
	<b>Planned Activities</b>	Will demolish five vacant, abandoned single-family residential structures.
4	<b>Project Name</b>	<b>Fair Housing Activities</b>
	<b>Target Area</b>	City-wide low-income households
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$20,000
	<b>Description</b>	Public service funding will be provided to support City staff who will conduct fair housing activities to support the 2014 Assessment of Fair Housing Plan.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	There is a population of approximately 75,548 residing in the City of Kalamazoo of a non-low/mod and low-mod status that will benefit from proposed activity.  Families experiencing discrimination will benefit from this proposed activity.
	<b>Location Description</b>	City wide
	<b>Planned Activities</b>	Public service dollars will be utilized to address the action items from the 2014 Assessment of Fair Housing Plan. In addition, community outreach, provider testing, complaint investigation and technical assistance to the City and federally funded sub recipients will be provided.
5	<b>Project Name</b>	<b>Parks and Recreation</b>
	<b>Target Area</b>	CDBG-Eligible Census Tracts
	<b>Goals Supported</b>	Neighborhood Enhancement
	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	CDBG: \$25,907
	<b>Description</b>	Infrastructure
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	There is a population of approximately 26,329 living in the six core CDBG-Eligible Census Tracts (Eastside, Edison, Stuart/ Douglass, Northside, Southside, and Vine) neighborhoods. Approximately 68 percent of these households have incomes at 80 percent or less of the area median income and approximately 43.1 percent live below the federal poverty line that will benefit from this proposed activity.
	<b>Location Description</b>	The activities will take place in the 1.00, 2.01, 2.02, 3.00, 5.00, 6.00, 9.00, 10.00 and 11.00 Census tracts.
	<b>Planned Activities</b>	The City of Kalamazoo Public Service Department will use CDBG funds to enhance the infrastructure of core neighborhoods within CDBG-eligible census tracts.

6	<b>Project Name</b>	<b>Public Safety - Neighborhood Officers</b>
	<b>Target Area</b>	CDBG-Eligible Census Tracts
	<b>Goals Supported</b>	Neighborhood Enhancement
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$150,000
	<b>Description</b>	The City of Kalamazoo Public Safety Department will use CDBG funds toward the salaries of two public safety officers for crime awareness and prevention in the low- to moderate-income neighborhoods.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Families within the CDBG-eligible neighborhood will benefit from this activity as Community Policing Officers will provide needed crime prevention activities. Partnerships will be established with the neighborhood associations to ensure outreach to the community.
	<b>Location Description</b>	The activities will take place in the 1.00, 2.01, 2.02, 3.00, 5.00, 6.00, 9.00, 10.00 and 11.00 Census tracts.
<b>Planned Activities</b>	<p>The role of the Community Policing Special Unit is to prevent crime through identification of trends and the creation of action plans for resolution in partnership with neighborhood and community organizations.</p> <p>The KDPS Community Policing Special Unit is intended to partner with the neighborhood associations to identify crime trends that negatively impact the quality of life within the CDBG-eligible neighborhoods, particularly Eastside, Edison and Vine. The Community Police Officers will maintain close relationships with neighborhood directors and associations to stay apprised of problems, "hot-spots," and priorities of the neighborhoods, so they can discuss prevention strategies and develop a comprehensive prevention approach in a timely manner.</p> <p>The Officers will attend monthly neighborhood association meetings and neighborhood watch meetings. They will give presentations within the neighborhoods on an array of topics, mostly geared toward crime prevention and personal safety awareness. The partnership between Public Safety and the citizens of the CDBG-eligible neighborhoods will assist in solving problems creatively to prevent crime.</p>	
7	<b>Project Name</b>	<b>Critical Home Repair (Community Homeworks)</b>
	<b>Target Area</b>	City-wide low-income households
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Rehabilitation of Existing Units
	<b>Funding</b>	CDBG: \$200,000
	<b>Description</b>	Community Homeworks will use CDBG funding to complete approximately 80 critical home repairs for low- to moderate-income homeowners.
	<b>Target Date</b>	6/30/2017

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Eighty (80) low-income households will benefit from this proposed activity.
	<b>Location Description</b>	City-wide low-income households
	<b>Planned Activities</b>	Minor/emergency home repair and moderate housing rehabilitation
<b>8</b>	<b>Project Name</b>	<b>TBRA – Administration (HRI)</b>
	<b>Target Area</b>	City-wide low-income households
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Rental Assistance
	<b>Funding</b>	CDBG: \$56,375
	<b>Description</b>	Housing Resources, Inc. will use CDBG funds to administer the Family Self-Sufficiency/TBRA program. It is estimated that 41 households will receive direct financial assistance through HOME TBRA with related technical and social services. Staff intake and related services/administration will be provided through CDBG.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 41 households will benefit from this propose activity
	<b>Location Description</b>	City wide
	<b>Planned Activities</b>	Housing counseling, rental inspections, and rental assistance.

9	<b>Project Name</b>	<b>Home Repair for the Elderly (Senior Services)</b>
	<b>Target Area</b>	City-wide low-income households
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Rehabilitation of Existing Units
	<b>Funding</b>	CDBG: \$75,000
	<b>Description</b>	Senior Services, Inc. will use CDBG funds to perform minor home repairs and barrier-free accessibility enhancements to approximately 32 housing units owned by senior citizens in CDBG-eligible Census Tracts throughout the City of Kalamazoo.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Thirty-Two (32) senior households will benefit from this proposed activity.
	<b>Location Description</b>	CDBG-eligible neighborhoods
	<b>Planned Activities</b>	Minor/emergency home repair and ADA accessibility improvements
10	<b>Project Name</b>	<b>LISC Continuum of Care</b>
	<b>Target Area</b>	City-wide low-income households
	<b>Goals Supported</b>	Homeless Assistance
	<b>Needs Addressed</b>	Homeless Prevention
	<b>Funding</b>	CDBG: \$20,000
	<b>Description</b>	LISC will provide technical assistance, capacity building training, and evaluation to approximately four housing and community development non-profit organizations, including CHDOs, operating in the City of Kalamazoo, primarily in the eligible CDBG neighborhoods. LISC will also provide staff for the Affordable Housing Partnership.
	<b>Target Date</b>	06/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Homeless families will benefit from this proposed activity.
	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Administration of the Continuum of Care.

11	<b>Project Name</b>	<b>Tenant Based Rental Assistance (TBRA) – (HRI)</b>
	<b>Target Area</b>	City-wide low-income households
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Rental Assistance
	<b>Funding</b>	HOME: \$80,000
	<b>Description</b>	Housing Resources, Inc. will use HOME funds for rental and rent deposit assistance to approximately 55 households through its TBRA program.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 41 Low-income families will benefit from this proposed activity.
	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Tenant based rental assistance
12	<b>Project Name</b>	<b>Property Development for Homeownership (Fair Housing Center of Southwest Michigan)</b>
	<b>Target Area</b>	CDBG-Eligible Census Tracts
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Rehabilitation of Existing Units
	<b>Funding</b>	HOME: \$76,974
	<b>Description</b>	Fair Housing Center will use HOME funds to rehabilitate and lease one vacant single family homes.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	One (1) low-income family will benefit from this proposed activity.
	<b>Location Description</b>	CDBG-eligible neighborhoods
	<b>Planned Activities</b>	Acquisition and rehabilitation of one vacant single-family housing units to be included in Lease/Purchase program.

13	<b>Project Name</b>	<b>Affordable Housing Rehabilitation (Kalamazoo Collective)</b>
	<b>Target Area</b>	CDBG-Eligible Census Tracts
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Rental
	<b>Funding</b>	HOME: \$100,000
	<b>Description</b>	Kalamazoo Collective will use HOME funds to rehabilitate and rent 6 vacant single family homes.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Six (6) low-income families will benefit from this proposed activity.
	<b>Location Description</b>	CDBG - eligible Census Tract
	<b>Planned Activities</b>	Rehab & Rental of Units
14	<b>Project Name</b>	<b>The Frank B. Lay Historical Residence (College Town Properties, LLC)</b>
	<b>Target Area</b>	CDBG-Eligible Census Tracts
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	CDBG - eligible Census Tract
	<b>Funding</b>	HOME: \$71,000
	<b>Description</b>	College Town Properties will use HOME funds to rehabilitate and rent 6 vacant single family homes.
	<b>Target Date</b>	6/30/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Six (6) low-income families will benefit from this proposed activity.
	<b>Location Description</b>	CDBG - eligible Census Tract
	<b>Planned Activities</b>	Rehab

**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 City of Kalamazoo has chosen to focus CDBG funds where at least 51 percent of the residents are considered low and moderate income by HUD. These neighborhoods and Census tracts are:

- 67.9% Eastside – 1.00
- 67.9% Central Business District – 2.01
- 80.5% Northside – 2.02 and 3.00
- 68.7% Douglas/Stuart – 5.00
- 72.85 Vine – 6.00
- 68.5% Edison – 9.00, 10.00 and part of 11.00
- 55.5% Southside – 11.00
- 52.1% Oakwood – 16.03

HOME and ESG funds are intended to be used throughout the City.

**Geographic Distribution**

Target Area	Percentage of Funds
City-wide low-income households	56%
CDBG-Eligible Census Tracts	44%

**Table- 12 - Geographic Distribution**

**Rationale for the priorities for allocating investments geographically**

The focus of CDBG funding in these areas was not only because of eligibility under HUD rules. Many of the core neighborhoods have additional socioeconomic reasons that warrant concentrating resources. Approximately 32 percent of individuals residing in the City of Kalamazoo are living below the federal poverty level. This is almost double the rate of individuals living below the poverty level for the State of Michigan and Kalamazoo County. While the City is experiencing higher rates of poverty, only three Census tracts meet HUD’s definition of “racially or ethnically concentrated areas of poverty.” An area must have a non-White/Caucasian population of 50 percent or more and poverty rate that exceeds 40 percent to be considered concentrated.

The three Census tracts are 1.00 (Eastside) and 2.02 and 3.00 (Northside). The Eastside Neighborhood has a poverty rate of 47.5 percent and 76.3 percent of the population is of minority status. The Northside Neighborhood (2.02 and 3.00) averages a poverty rate of 45.4 percent and a minority population of 92.1 percent.

The core neighborhoods also have much older housing stock. Approximately 90 percent of the homes were built prior to 1979, which raises the risk of lead based paint. Over 90 percent of the homes in

Census tracts 2.02 (Northside), 6.00 (Vine), 9.00 (Edison), and 16.03 (Oakwood) were built before 1979. According to the 2012 American Community Survey, approximately 60 percent of the homes found in the CDBG eligible census tracts were built prior to 1939. The advanced age of the housing stock indicates a need for continued maintenance, lead based paint removal, weatherization and energy efficiency upgrades.

It appears that neighborhood disparities in accessing community assets exist between the more affluent neighborhoods in the City and many of the core neighborhoods. The Edison and Northside Neighborhoods struggle with poor performing schools, have higher percentages of poverty and persons receiving public assistance. Not unexpectedly, these same neighborhoods tend to have lower participation in the labor market, lower percentage of persons employed and lower percentage of persons with either a high school or bachelor's degree. Access to employment centers may be more problematic because of difficulties accessing the transit system or limited financial means to own and maintain a car.

HOME and ESG funds are intended to be used throughout the City. HOME funds are predominately utilized to develop affordable housing. Dispersing affordable housing throughout the City helps to prevent concentrating low income residents within one neighborhood. ESG funds are predominately to assist the homeless. Many of the homeless shelters are located within downtown Kalamazoo or the core neighborhoods. However, the homeless prevention and rapid re-housing component of ESG may find funds spent throughout the City.

## **Discussion**

## Affordable Housing

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

#### Introduction

Affordable housing continues to be a priority for the City of Kalamazoo. Currently, there are more households in need of affordable housing than units available. For PY2016, the following goals are expected:

One Year Goals for the Number of Households to be Supported	
Homeless	452 ESG
Non-Homeless	41 TBRA – Counseling Housing Quality Insp
Special-Needs	86 ESG
<b>Total</b>	<b>579</b>

**Table - 13- One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	41- HRI - TBRA
The Production of New Units	0
Rehab of Existing Units	13 (K Collective/College Tn/FH)
Acquisition of Existing Units	0
<b>Total</b>	<b>54</b>

**Table – 14 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

The total numbers between the two tables differ because of the number of households that are expected to receive minor or emergency home repair, which have not been classified as full rehabilitation. In addition, one home is expected to receive down payment assistance which is also not included in the first table.

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

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

The City of Kalamazoo will continue to be supportive of the Public Housing Commission's expansion of services, and views a partnership with the Commission as an important step in addressing the local issue of "fair share housing," that is, ensuring that affordable housing is available throughout the County, and not just within the City of Kalamazoo. No direct funding actions are planned with the Public Housing Commission in PY2016.

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

The City will work with the Public Housing Commission to encourage residents to volunteer for the Community Development Act Advisory Committee, which works with the Community Planning and Development staff to advise the City Commission on matters pertaining to housing and community development within the City of Kalamazoo

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

### **Introduction**

The following activities, either supported by the City or our nonprofit community partners, will assist in the reduction or elimination of homelessness in Kalamazoo.

### **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**

**Housing Resources, Inc. and Goodwill Industries** sponsor a weekly Community Housing Hour, which includes a number of housing and social service providers that help resolve housing issues. The event reaches out to both the homeless and those in danger of becoming homeless. Organizations include the Department of Human Services, Legal Aid of Southwest Michigan, Kalamazoo Community Mental Health and Kalamazoo Neighborhood Housing Services. The type of services provided include housing search information, prevention of eviction, emergency shelter referrals, foreclosure and homeownership, budgeting and resources for landlords and tenants.

**Kalamazoo Community Mental Health and Substance Abuse Services support a Housing Recovery Center**, which assists individuals with finding and maintaining affordable housing. One of the services the Recovery Center offers is outreach to people living in emergency shelters and places not meant for human habitation. Ultimately, the outreach is to provide homeless individuals with the services they need and to help them find permanent and supportive housing.

**Catholic Charities Dioceses of Kalamazoo** utilizes a street outreach program grant from U.S. Department of Health and Human Services. The grant has enabled Catholic Charities to meet homeless youth at their point of need. The street outreach program allowed Catholic Charities to build upon and expand their current drop-in center services to have staff available on the street at designated times, seeking out youth who most need their services.

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

The countywide Coordinated Community Assessment System utilizes Gryphon Place 2-1-1 to provide crisis intervention and perform the initial centralized screening and intake process to determine primary and urgent needs. Individuals are prioritized based on the severity of their housing crisis. Persons with greatest need are referred to Housing Resources, Inc., the Lead Agency/Housing Assessment and Resource Agency (HARA), for housing assessment and development of the Community Housing Assistance Plan (CHAP). Those with an urgent need are referred to area emergency shelters where the CHAP is developed in consultation with the HARA.

The HARA schedules the housing assessment visit within two days of initial contact. The HARA Housing Resource Specialist creates the CHAP utilizing the Homeless Management Information System (HMIS) and prioritizes strength based case management principles. Resources are provided based on need and may include: case coordination, financial assistance, landlord/tenant education/engagement, linkage to community partner resources, and referrals to mainstream service providers.

Emergency shelter services, with the goal of rapid re-housing, are provided to homeless households. These services include a shelter diversion assessment, shelter entry with the goal of rapid exit, financial assistance in the form of rental subsidy, and tenant-landlord engagement. Emergency shelters with rapid re-housing services have the goal of achieving sustainable permanent affordable housing.

The City of Kalamazoo continues to provide ESG funds through the Kalamazoo County Continuum of Care to support emergency shelter and transitional housing needs. Exact outcomes will not be known until the application process, which will occur in the summer of 2016.

**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**

Housing Resources Inc. (HRI), as the CoC's, Housing Assessment and Resource Center (HARA), hosts a Housing Stabilization Program providing community wide centralized intake and assessment and/or shelter diversion services, homeless prevention, focusing on reducing evictions for low income residents, rapid re-housing, rapidly exiting homeless households from emergency shelter to new sustainable housing options to avoid repeat episodes of homelessness, and permanent supportive housing, serving households where the head of household has a disability and who are chronically vulnerable to housing instability and repeat episodes of homelessness. Families and individuals are referred to the HARA for assessment and development of the Community Housing Assistance Plan (CHAP). Walk-in services are provided through centrally located satellite locations and at Ministry with Community, the local drop-in day shelter. Connections to services are also available at the weekly "Community Housing Hour"; located at the Goodwill Human Services Campus, multiple agencies participate in providing housing related information.

Gryphon Place's 2-1-1 Information and Referral service provides quick and easy access to information about service agencies (Dial 2-1-1 24 hours a day, 365 days a year) in Kalamazoo County. Community Resource Advisors work with callers to assess their needs, determine their options and provide appropriate programs/services, give support and advocate for the caller as needed.

The 2-1-1 Advisors have after-hour contacts for local housing agencies and shelters, the Access Center (Community Mental Health), Mobile Crisis Response (Youth), and public safety (welfare check, adult/child protective services). The local YWCA (Domestic Violence) and the ARK Youth Shelter maintain a 24-hour Hotlines; (269) 385.3587 and (800) 873-8336, respectively.

The CoC's prevention work includes a "homeless preference" vouchers registry and it works closely with the Michigan State Housing Development Authority's (MSHDA) agent who administers 947 Housing Choice Vouchers (HCV), 95 project-based, and HUD-VASH (veteran) vouchers.

In addition, the following programs have been developed to help prevent individuals and families from becoming homeless:

- The Eviction Diversion program is designed to prevent rental evictions, reducing the number of families and individuals who are at jeopardy of becoming homeless. This is a unique partnership between the court system and the Continuum of Care to prevent rental eviction.
- The Navigator Program is a results oriented program that strives to eliminate barriers to housing and services for those in most need. A nonprofit partner that provides housing and homeless services designates a person who is able to cut through barriers to resolve difficult situations when a client is in crisis, when repeated requests for service have not been addressed, or when

a client is repeatedly referred from agency to agency without action.

- Project Connect is a program that provides a day of assistance for families and individuals living in our community that are in need of services, ranging from haircuts, to Department of Human Services applications, from resume building to housing services. One important service that is provided is the ability to obtain birth certificates and personal identification, which is often a serious barrier to receiving other necessary benefits. More than 50 organizations come together and offer services at a single location.

In addition, the City funds Housing Resources, Inc. and Catholic Family Services with tenant based rental assistance (TBRA). These agencies expect to support up to 55 clients, some of which may be experiencing homelessness or in jeopardy of becoming homeless. Funds will also be provided through the ESG program toward rapid re-housing and homeless prevention.

**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.**

**Stakeholders and/or collaborating agencies that are responsible for ensuring that persons being discharged from a system of care are not routinely discharged into homelessness.** In 2012, the CoC developed and adopted a formal CoC Discharge Planning policy statement, and in 2013 the CoC's Systems of Care Team "Discharge Workgroup," including a representatives from Bronson Healthcare the Michigan Department of Health & Human Services (foster care discharges) studied local discharge policies; they work to identify issues, gaps, and barriers to a systematic approach to discharge. Additionally, providers of youth services work closely with the resources of the Coordinated Assessment and Referral Agency (HRI); the CoC assessment/discharge planning process identifies and coordinates individualized supports and services needed to live successfully in the community for any Kalamazoo County citizen with a disability, condition, or problem related to any life transition. Individuals frequently note they will stay with family or friends upon discharge; housing options may include placement with family, enrollment in transitional housing programs funded by faith based providers, subsidized housing, project based housing, and room and board facilities.

The Continuum of Care and related policies regarding discharge includes:

**HEALTH CARE.** The two regional hospitals serving the CoC have multi-disciplinary teams with comprehensive protocols that consider the need for housing with an individualized discharge plan. Kalamazoo Community Mental Health and Substance Abuse Services Emergency Mental Health outreach workers also provide on call emergency mental health evaluation and program placement. The CoC provides a single coordinated assessment and referral point of entry for all housing related emergencies in partnership with 2-1-1 to ensure appropriate housing and other community resources eligibility is assessed. Services may include access to emergency, transitional and permanent housing options, case management, landlord liaisons, and emergency financial assistance.

**MENTAL HEALTH CARE.** Kalamazoo Community Mental Health and Substance Abuse Services (KCMHSAS) has the responsibility for ensuring that persons being discharged from a system of care are not routinely discharged into homelessness. As the CoC's provider of public mental health and substance abuse services in Kalamazoo County, as required by state statute, KCMHSAS has a comprehensive discharge and

planning policy. An individual written discharge plan is prepared for each client in order to provide continuity of services. One component of the Comprehensive Individualized Discharge Plan is related to housing and shelter. KCMHSAS also operates a Homeless/Housing Resource Center. The local options for housing range from market rate units, subsidized project-based, subsidized specialized supportive housing, SRO residences, room and board homes, adult foster care, specialized residential, crisis residential, transitional and emergency shelter.

**FOSTER CARE.** Providers of CoC funded youth services, Catholic Charities and Lutheran Services in Kalamazoo adhere to the formal foster care policy of the Michigan Department of Health and Human Services which directs the treatment of youth in foster care including discharge. Person centered planning is completed early in the assessment process to assist youth in learning life skills, financial literacy, employment, educational, housing maintenance, health and relationship and other skills that will lead to self-sufficiency. Permanency is central to these plans, including assisting the youth to build a long term relationship with one person who will stay involved with the youth and coordinate individualized support. Youth who are permanent wards may stay in foster care up to age 19 and possibly beyond if the youth is unstable. Youth are discharged to their own apartment, to live with friends, relatives or permanent foster parents, to college dorms and other arrangements, as called for in their housing plan.

**CORRECTIONS.** The Kalamazoo County Jail (Sheriff’s Department), has discharge planning responsibility for those who are at risk of becoming homeless. The Sheriff’s Department implemented a discharge policy in 2008 and assistance on housing and other supports to sustain housing is made available at or near discharge, if requested by the inmate. The Chaplin’s office works with individuals to identify and coordinate community resources to meet the unique needs of each inmate. Information about housing assistance and other community based services are posted on boards internally within the jail. Inmates, at their option, are encouraged to take advantage of the information about housing or other related services. The CoC also works with faith based organizations that reach out to those with a history of criminal sexual conduct.

**Veterans:** The regional Veteran’s Administration (VA) follows a set of discharge criteria when releasing patients into the community. VA social workers and case managers assess and work with the patients who are homeless to find them appropriate shelter before their release. The VA works with emergency shelters, other homeless housing, and supportive services providers in the Continuum of Care to assure suitable placement is achieved after discharge

**Discussion**

**Table - 15**

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>
<b>N/A</b>
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family
Tenant-based rental assistance
Units provided in housing facilities (transitional or permanent) that are being developed, leased, or operated
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds
Total

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

### **Introduction**

Barriers to affordable housing are varied and complex. Possible barriers to the development or retention of affordable housing are public policies, particularly those of the City. Such policies include land use controls, zoning ordinances, building codes, and policies that affect the return on residential investment. In addition to public policies, larger social issues and outside forces impact the ability to access affordable housing. Social issues like poverty and lack of employment, and outside forces like reductions in Federal and State funding to develop new housing, present a barrier to affordable housing.

### **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 following information reviews some of the possible barriers in Kalamazoo:

#### ***Land Use Controls***

Most of the available land in the City has been developed. There are only a small number of large vacant tracts of land that remain, thereby limiting the future development of residential units. There are a number of smaller parcels that are vacant and suitable for infill construction of residential units. A number of vacant or underutilized commercial buildings are also prime locations for redevelopment, with residential use being at least a component of the use.

A barrier to the development and redevelopment of these infill sites is environmental contamination. Particularly in many of the lower income neighborhoods, many of the properties that are available for redevelopment are environmentally contaminated primarily due to overuse of the site or an adjacent site. Clean-up of these sites can be very costly, thereby limiting the ability to attract new business and housing to these sites. It is much easier and cheaper to develop “green fields” in the unpolluted, outlying communities than it is to develop the “brownfields” in the City.

#### ***Zoning Ordinance and Subdivisions***

The City’s existing Zoning Ordinance does not appear to be a barrier to affordable housing. It permits multifamily housing in five of the eleven residential zoning districts. In addition, duplexes are permitted in two other districts in which multifamily residential is not permitted.

The four single family residential districts allow for small minimum lot sizes, which permits higher density of development than in many of the jurisdictions surrounding the City of Kalamazoo. In adjacent jurisdictions, large lot zoning does create a barrier to affordable housing and establishes pressures that force some low income populations into the City of Kalamazoo. The low densities found in adjacent jurisdictions create increased prices and barriers to affordability.

Additionally, the City of Kalamazoo Zoning Ordinance allows for multifamily development in several commercial districts to allow for mixed use and to encourage walkability.

#### ***Housing and Building Codes***

The City of Kalamazoo enforces the Michigan Building Code, which is standard among municipalities in

the State.

The City employs an anti-blight and building code enforcement team. As a result, blight and abandonment issues are addressed more quickly. The rental certification program continues to be administered, which helps to improve the quality of rental housing. Concerns have been raised that the rental certification program is a barrier to affordable housing because it adds an additional cost to the management of rental properties. However, in a city where over half of the residential units are rental, a program of this type is necessary to not only maintain the health, safety and welfare of those who rent in Kalamazoo, but to maintain or improve property values in City neighborhoods.

## **Discussion**

The City will utilize a variety of strategies and support from community partners to help address barriers to affordable housing. Generally, the City utilizes 50 percent or more of the total HUD grant award towards housing activities. These funds will help to increase the supply of affordable housing, as well as helping those in affordable units to remain housed. In addition, the City has encouraged, through the competitive application process, that housing providers form partnerships in the hopes of avoiding duplication of services that would allow assistance to larger numbers of low income households.

Most of these partners also provide needed social services that help households with long term housing sustainability. The nonprofit partners receiving funding to assist with affordable housing in PY2016 are:

- Housing Resources, Inc.
- Community Homeworks
- Senior Services, Inc.
- Fair Housing Center of Southwest Michigan
- Kalamazoo Collective

The Kalamazoo Brownfield Redevelopment Initiative has been a tremendous resource in addressing the issue of contaminated properties that may have the ability to be redeveloped. Using captured tax revenue, the Brownfield Initiative has purchased many contaminated properties throughout the City. They then prepare these sites for redevelopment by removing the contamination. The properties are put back on the market and resold without the environmental contamination.

Some additional actions planned for PY2016 are:

- Work with local nonprofit housing providers on the development of new and/or rehabilitated housing. Encourage variety in housing types like duplexes, townhomes, 4-unit apartments to provide a wider range of rents and mortgage costs.
- Improve financial options for Kalamazoo residents to increase homeownership and homeowner maintenance by working with local lending institutions and nonprofits to develop loan types and/or underwriting requirements that would allow for nontraditional home loans.
- Work with local nonprofit housing providers to provide homeowner subsidies to help low income families with down payment assistance.
- Improve access to quality rental housing in Kalamazoo through continued support of tenant based rental assistance programs. In addition, consider the development of a program where vacant and/or tax foreclosed properties are sold to landlords who maintain exceptional rental

properties and will rehabilitate the home for rental use. Work with local nonprofit housing providers on free and/or reduced-cost financial literacy for households from the Eastside, Edison or Northside Neighborhoods. Focus CDBG funding on substandard housing and/or deferred maintenance of affordable housing units, particularly in the Eastside, Edison and Northside Neighborhoods.

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

### **Introduction**

The City of Kalamazoo will continue to engage in a variety of activities during the 2016 program year, which are intended to further local housing and community development goals.

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

The Community Planning and Development Department will continue to collaborate with our local community housing and human service providers, government officials, business leaders and citizens to identify areas of need in the community. Coordinated efforts have been improved and will continue to be enhanced through PY2016 with local funders and other governmental entities to try and address underserved needs.

Based on the information gathered for the development of the 2014-2018 Consolidated Plan, one of the more underserved populations is the very low income, particularly in regards to housing. Low income renters experience the greatest housing cost burden in Kalamazoo. The tenant based rental assistance programs supported by the City and sponsored by Housing Resources, Incorporated will help us address this underserved need.

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

In PY2016, the City will continue to place an emphasis on affordable housing as part of the competitive grant application process. A total of four nonprofits and one for profit organization will receive CDBG, ESG and HOME funding to expand new and maintain existing affordable housing. Approximately 753 thousand (CDBG/HOME) of the total funds provided to the City will be used towards the improvement of affordable housing in the City.

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

One single-family home will be completely rehabbed with PY2016 funds. The removal of lead based paint, if found, will be a requirement of these rehabilitations. In addition, the City plans to utilize \$83,627 to demolish blighted residential structures in the City. It is likely that these homes may contain lead based paint because they tend to be older structures where lead is more prevalent. The removal of approximately five structures will reduce the chances of a household living with lead contamination.

The City will also continue to work with the Michigan Department of Community Health, Division of Environmental Health, and Healthy Homes Program to reduce lead-based paint hazards. The Division provides grant funding to homeowners to remediate lead based paint. Through the City, local nonprofits and neighborhood associations are kept apprised of available funding and the process to receive grant funds.

### **Actions planned to reduce the number of poverty-level families**

Reduction in poverty has recently become a priority for the Kalamazoo City Commission. They have decided to take a leadership role in fostering collective action to reduce poverty in the City, especially for children.

To that end, the City Commission is actively involved with and supportive of, the Kalamazoo County Poverty Reduction Initiative. This initiative is a coalition of local business, education, human service, economic development, philanthropic, government, legal, academic, and faith-based leaders whose mission is “to foster collaborative and mutually accountable public-private partnerships that increase both access to and resources for individuals and families living in poverty.”

The Poverty Reduction Initiative has long-range plans to raise funds to invest in the rehabilitation of substandard rental units and homes owned by low income households. They intend to encourage and assist in the conversion of existing market rate units to affordable housing, and add permanently affordable rental units with an investment in rental subsidies.

For PY2016, the City of Kalamazoo will continue to work towards helping those in poverty access affordable housing. In addition, the City has developed a Section 3 preference policy to promote the procurement of Section 3 businesses. The intent is to improve the economic circumstances of local low income business owners and residents.

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

Local Initiatives Support Corporation (LISC) will continue to coordinate housing and community development efforts through the Sustainable Communities Initiative. They have reached out to other service providers, neighborhood organizations and funders to help them achieve the goals of the Initiative, which are expanded capital investment in housing, increasing family income and wealth, stimulating the local economy, improving access to quality education and developing healthy environments and lifestyles. The Deputy City Manager will continue to sit on the Board of LISC Kalamazoo. The Continuum of Care is operated as a compliment to the LISC Sustainable Communities Initiative. This collaboration of nonprofit, business, governmental, education, health, human service, advocacy entities, and constituent groups are creating a comprehensive and integrated approach to end homelessness and insure permanent housing for low income people. The Continuum of Care has three volunteer groups that help improve provision of services, eliminate barriers to housing, improve the management of data, and allocate funding. The Community Development Manager will sit on the Allocations and Accountability Team.

The City will continue to host bi-monthly meetings with the core CDBG-eligible neighborhoods during PY2016. The executive directors of each neighborhood organization attend the meetings along with representatives from City departments like Public Safety, Public Services, Parks and Recreation, and Community Planning and Development. The meetings focus on neighborhood issues, the coordination of services, updates on City improvements, etc. The intent is to provide an open forum for neighborhood leaders to work cooperatively with the City on addressing neighborhood needs.

The City, particularly the Department of Community Planning and Development, could benefit from stronger relationships with our county partners. The Kalamazoo County Department of Health and Community Services houses the Kalamazoo County Community Action Agency, which provides programs and services to help low income households achieve greater economic self-sufficiency. The City will work towards more intergovernmental cooperation in PY2016 to work towards joint community development projects, data sharing and best practices.

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

The City of Kalamazoo has indicated that the priorities that should be addressed during the five year period of this Plan are affordable housing, homeless assistance, neighborhood enhancement and youth development. The institutional structure for the neighborhood enhancement and youth development priorities is internal to the City and has no gaps to providing services. The affordable housing priority could benefit from a stronger relationship with the Kalamazoo County Community Action Agency. Community Planning and Development staff at the City plan to engage with the housing programs staff to review possible areas of partnership that will improve affordable housing outcomes.

The development of new affordable housing, particularly with supportive services, is also a goal of the Continuum of Care. Partnerships with the City of Kalamazoo, local nonprofit housing providers and the Michigan State Housing Development Authority will need to be an affordable housing development strategy. The City will continue to invest in affordable housing through both the CDBG and HOME grant programs. The development of new units will continue to be considered based on successful financial statements and plans.

To have a more proactive approach to homeless prevention, the Continuum of Care developed the Systems of Care team. They established work groups to address the needs/barriers of those that may become homeless. The Team works to promote the adoption of evidence-based and promising program practices in support of a Housing First philosophy of care. They prioritize Continuous Quality Improvement in service delivery and educate and inform members on national and community best practices.

**Discussion**

**Program Specific Requirements**

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

**Introduction**

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.

**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.

**Table - 16**

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

**Other CDBG Requirements**

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

**HOME Investment Partnership Program (HOME)**

**Reference 24 CFR 91.220(I)(2)**

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

The City does not plan any other forms of investments except for those identified in Section 92.205 of the HOME Investment Partnership Program Final Rule.

- 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:

Per the requirements of 24 CFR 92.254, the City will require Subrecipients and developers to recapture all, or a portion of, the HOME investment if the homeowner decides to sell the house within the affordability period at whatever price the market will bear. The homebuyer may sell the

property to any willing buyer. However, the sale of the property during the affordability period triggers repayment of the HOME funds utilized when it was originally purchased.

a. Reduction during the Affordability Period (Forgiveness):

The Subrecipient or developer will forgive the direct HOME subsidy during the time of the affordability period. The total amount of the direct HOME subsidy will be equally divided among the years of the affordability period. For example, a \$40,000 direct HOME subsidy would be equally forgiven over the 10 year affordability period, reducing by \$4,000 each year.

Forgiveness will only be given to the homebuyer for each year they occupy the home as their primary residence.

b. Amount of Repayment and Net Proceeds:

Net proceeds are defined as the sale price minus superior non-HOME loan repayments and any closing costs. If there are no net proceeds or insufficient proceeds to recapture the full amount of HOME investment due, the amount subject to repayment must be limited to what is available from net proceeds.

c. Homebuyer Agreement

Recapture of the HOME investment and forgiveness over time is required to be detailed in the Homebuyer Agreement signed by the homebuyer and recorded on a deed restriction with the County Clerk/Register of Deeds.

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 period of affordability is detailed in either the Subrecipient or developer agreement with the City of Kalamazoo. The agreement also requires the Subrecipient or developer to ensure compliance with the affordability period by placing a covenant or deed restriction that runs with the property and is recorded with the County Clerk/Register Office. A copy of the recorded document is provided to the homeowner and the City of Kalamazoo.

Per the requirements of 24 CFR 92.254, the Subrecipient or developer will recapture all or a portion of the HOME investment if the homeowner decides to sell the house within the affordability period at whatever price the market will bear. The homebuyer may sell the property to any willing buyer. However, the sale of the property during the affordability period triggers repayment of the direct HOME subsidy provided to the homeowner when it was originally purchased.

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:

The City of Kalamazoo does not utilize HOME funds to secure existing debt for multifamily

## Emergency Solutions Grant (ESG)

### Reference 91.220(l)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

**Source of Funding.** All CoC programs are funded by the McKinney-Vento Homeless Assistance Act of 1987 and administered by HUD; some ESG funds are passed through to the Michigan State Housing Development Authority (MSHDA). McKinney-Vento programs provide outreach, shelter, transitional housing, supportive services, rent subsidies, and permanent housing for people experiencing homelessness and/or at risk of homelessness.

- Additionally, in 2009, Congress passed the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act to consolidate HUD homelessness programs (Supportive Housing Program, Shelter Plus Care, and Moderate Rehabilitation/Single Room Occupancy). The Hearth Act amended and reauthorized the McKinney-Vento Homelessness Assistance Act, and is intended to further assist people in regaining stable, permanent housing and supports a coordinated intake process, effective data collection, performance measurement and program evaluation systems.
- The dollar amount of available funding is determined competitively for the Continuum of Care Program Competition and by formula to each jurisdiction (State of Michigan, Kalamazoo City and County) for the Emergency Solutions Grants program. The CoC and the City of Kalamazoo combine their Emergency Solutions Grants, funded by MSHDA and HUD, respectively, into a single application process.
- Funding is subject to federal appropriations, state and local allocations and terms of the relevant Notice of Funding Availability (NOFA); *funding is not guaranteed by the CoC, City of Kalamazoo, HUD or MSHDA until grant agreements are finalized and executed.*

**Eligible Uses of Funding.** CoC and/or ESG funding is available for projects that provide:

- Homeless outreach, assessment, and prevention; Emergency shelter (ES); Transitional housing (TH); Permanent housing with supportive services (PSH); Permanent Housing-Rapid-Rehousing (PH-RR) Permanent housing only (PH); Supportive services only (SSO), and Planning, HMIS, and Grant Administration.

### Ineligible Uses of Funding

Funds cannot be allocated to any organization that:

1. Does not comply with the nondiscrimination provisions of local, State and Federal civil rights laws (see CoC Fair Housing Policy); or
2. Requires participation in religious activities as a condition for receiving services; or
3. Does not comply with the Equal Access to Housing in HUD Programs – Regardless of Sexual Orientation or Gender Identity Final Rule (2012 Equal Access Rule).

### CoC Collaborative Applicant

The Local Initiatives Support Corporation (LISC) employs the CoC Director and serves as Kalamazoo County's Lead Agency and Collaborative Applicant. The City of Kalamazoo's Deputy City Manager serves on the LISC Board; the LISC Board serves as the CoC's governing body.

**If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.**

The Continuum of Care formalized a “No Wrong Door” countywide Coordinated Community Assessment System in 2009. Gryphon Place 2-1-1 provides crisis intervention 24/7 and performs the initial Centralized Screening and Intake process to determine primary and urgent needs. Individuals are prioritized based on the severity of their housing crisis. Persons with primary need are referred to Housing Resources, Inc., the Lead Agency/Housing Assessment and Resource Agency (HARA) for housing assessment and development of the Community Housing Assistance Plan (CHAP). Those with an urgent need are referred to area emergency shelters where the CHAP is developed in consultation with the HARA. Walk-in services are provided through centrally located satellite locations and through the weekly Community Housing Hour at the Goodwill Human Services Campus where multiple agencies participate in providing housing related information.

Through enhancements and expansion of the coordinated access and assessment process and the implementation of the CHaMP (Community Housing Matching and Planning) process, families becoming homeless will be prioritized for services and housing placement.

In addition, through a partnership with United Way and the YWCA, a “Liaison to Success” pilot program will be implemented in 2016 that serves 20 “underemployed” households specifically identified as to receive intensive supportive services for the purpose of improving financial and housing stability in the household with specialized services for families exiting the YWCA family shelter who will have an additional Victim Services case management component. These actions are dependent on the availability of housing units for those experiencing homelessness. The CoC’s newly formed HART (Housing Action Response Team) includes a team member dedicated to Housing Location and Landlord Engagement to find available units for these households.

**3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations) will be allocated**

The City of Kalamazoo currently renews funding for nonprofit agencies carrying out ESG-funded emergency shelter activities, provided that the contractual obligations have been met and project outcomes have been successful. The City may choose to reduce or eliminate funding to an agency that does not meet contractual obligations, or that administers a project that fails to meet outcome goals. If an existing program does not fit with the City's objectives, the agency may be asked to change its program design. The City may also transition to a competitive RFP process. The City does not plan to initiate other large ongoing ESG-funded emergency shelter programs. The City of Kalamazoo currently subcontracts all ESG funding to Housing Resources, Inc., which administers the ESG Program.

**4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG**

In order to meet the requirements under § 576.405(b), the City of Kalamazoo have partnered with the Local Initiatives Support Corporation (the local CoC Board). The local CoC Board and its multiple subcommittees each include participation by multiple people with lived experience of homelessness. One CoC Board subcommittee (the Community Advisory Forum) specifically provides a solutions-driven forum for those with lived experience of homelessness and front-line service workers to listen and support each other. It also brings consumers, providers and interested community members together to share information, and identify emerging issues and trends.

**5. Describe performance standards for evaluating ESG**

The procedures outlined in the ESG Monitoring Plan are designed specifically to apply to the monitoring of ESG-funded projects in the City of Kalamazoo.

Through on-site and desk monitoring, the reviewer can determine whether the program participant's performance meets program requirements and improve program participant performance by providing guidance and making recommendations. The specific purposes of monitoring are to:

- Validate the accuracy of information presented by the program participants;
- Follow-up on problems identified during the monitoring visit;
- Determine compliance for those activities where there is sufficient information to make eligibility and/or national objective determinations;
- Evaluate the reasonableness of judgments made for those activities that necessarily involve high levels of program participant judgment;
- Ascertain the Subrecipient's ability to ensure that activities carried out meet compliance requirements;
- Verify the accuracy of the program participant's records; and,
- Identify apparent causes of any problem(s) and offer recommendations for corrective actions.