The 2019 CAPER is the fifth performance report in the five-year Consolidated Plan cycle. The Report describes the allocation expenditures of Housing and Urban Development (HUD) Block Grant funds during the 2019 program year which runs July 1, 2019 to June 30, 2020.
CITY OF KALAMAZOO
JULY 2019 – JUNE 2020
Consolidated Annual Performance Evaluation Report

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CR-05 - Goals and Outcomes

**Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)**
This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The Consolidated Plan is designed to help local jurisdictions assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions. The consolidated planning process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from the three federal Community Planning and Development (CPD) formula block grant programs with service the City of Kalamazoo: the Community Development Block Grant (CDBG), the HOME Investment Partnership (HOME), and the Emergency Solutions Grant (ESG) program. In the Consolidated Annual Performance and Evaluation Report (CAPER), grantees report on accomplishments and progress toward Consolidated Plan goals in the prior year. The 2019 program year is the first year plan of the five-year Consolidated Plan. The program year covers the period from July 1, 2019 to June 30, 2024.

The following goals adopted in the 2019-2024 Consolidated Plan guided the City of Kalamazoo in assigning annual community priorities:

**Affordable Housing** - 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.

**Homeless Assistance** - 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.

**Neighborhood Enhancement** - 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.

**Youth Development** - 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

**Economic Development** – Expand economic opportunity that influence growth and stability for small businesses during and after COVID-19 Pandemic. Priority activities may include but are not limited to:

- Housing Assistance and Prevention of homelessness
- Maintenance or Improvement of Access to Public Services
- Maintenance or Improvement of Public Facilities and Infrastructure
- Economic Development, including retention and/or creation of employment opportunities for affected businesses
Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

The City observed progress in all of the goals for FY 2019 through the use of CDBG and HOME funds. The City of Kalamazoo receives a relatively modest amount of CDBG and HOME funding, and the City’s funding has remained level over the past couple of years. For this reason, the City maintains a fairly simple CDBG and HOME program, limiting resource to fewer sub-grantees and selecting those that will deliver the best outcomes to reach the City’s goals.
<table>
<thead>
<tr>
<th>Goal / Category</th>
<th>Funding</th>
<th>2019 Consolidate Plan Outcome</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Affordable Housing</strong></td>
<td>Source</td>
<td>Amount</td>
<td>Subrecipient</td>
</tr>
<tr>
<td>HOME</td>
<td>100,000</td>
<td>New Horizon</td>
<td>Rental units rehabilitated</td>
</tr>
<tr>
<td>HOME</td>
<td>118,000</td>
<td>Habitat for Humanity</td>
<td>Homeowner Housing Added</td>
</tr>
<tr>
<td>CDBG</td>
<td>275,000</td>
<td>S5, CH34, Lead Prog 11</td>
<td>Homeowner Housing Rehabilitated</td>
</tr>
<tr>
<td>HOME</td>
<td>0</td>
<td>N/A</td>
<td>Direct Financial Assistance to Homebuyers</td>
</tr>
<tr>
<td><strong>Homeless Assistance</strong></td>
<td>Source</td>
<td>Amount</td>
<td>Subrecipient</td>
</tr>
<tr>
<td>CDBG</td>
<td>$40,000</td>
<td>United Way MwC</td>
<td>Continuum of Care Counseling</td>
</tr>
<tr>
<td>HOME</td>
<td>$0</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>ESG</td>
<td>$0</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Goal /Category</td>
<td>Funding</td>
<td>2019 Consolidate Plan Outcome</td>
<td>2019</td>
</tr>
<tr>
<td>----------------</td>
<td>---------</td>
<td>-------------------------------</td>
<td>------</td>
</tr>
<tr>
<td><strong>Neighborhood Enhancements</strong></td>
<td>Source</td>
<td>Amount</td>
<td>Subrecipient</td>
</tr>
<tr>
<td>CDBG</td>
<td>$150,000</td>
<td>Public Safety</td>
<td>Public service activities other than Low/Moderate Income Housing Benefit</td>
</tr>
<tr>
<td>CDBG</td>
<td>$100,000</td>
<td>Demolition</td>
<td>Buildings Demolished</td>
</tr>
<tr>
<td>CDBG</td>
<td>400,000</td>
<td>Code Enforcement-cw</td>
<td>Housing Code Enforcement/Foreclosed Property Care</td>
</tr>
<tr>
<td><strong>Youth Development</strong></td>
<td>Source</td>
<td>Amount</td>
<td>Subrecipient</td>
</tr>
<tr>
<td>CDBG</td>
<td>$36,855</td>
<td>Parks &amp; Rec Infrastructure</td>
<td>Public service activities other than Low/Moderate Income Housing Benefit</td>
</tr>
<tr>
<td><strong>Economic Development</strong></td>
<td>Source</td>
<td>Amount</td>
<td>Subrecipient</td>
</tr>
<tr>
<td>CDBG</td>
<td>$</td>
<td>Parks &amp; Rec Infrastructure</td>
<td>Public service activities other than Low/Moderate Income Housing Benefit</td>
</tr>
</tbody>
</table>

Table 1 - Accomplishments – Program Year & Strategic Plan to Date
Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

During year one 2019 program year, of the 5-year plan, the City of Kalamazoo effectively used its Community Development Block Grant (CDBG) and HOME, funds to undertake a variety of programs, projects and activities designed to address housing and community development needs throughout the City of Kalamazoo. High priority initiatives included owner-occupied housing rehabilitation, homebuyer assistance, slum/blight clearance, provision of public safety services, and technical assistance. The accomplishments of the City of Kalamazoo was consistent with the consolidated Plan’s high-priority community development and housing objectives, and are presented in this report within the 2019 program year.
CR-10 - Racial and Ethnic composition of families assisted
Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

<table>
<thead>
<tr>
<th>Race</th>
<th>CDBG</th>
<th>HOME</th>
<th>ESG(not Funded)</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>34</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td>Black or African-American</td>
<td>83</td>
<td>20</td>
<td>0</td>
</tr>
<tr>
<td>Asian</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>American Indian or American Native</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Native Hawaiian or Other Pacific Islander</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Mixed</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Unspecified</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>117</strong></td>
<td><strong>23</strong></td>
<td><strong>0</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Ethnicity</th>
<th>CDBG</th>
<th>HOME</th>
<th>ESG(not Funded)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hispanic</td>
<td>0</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Not Hispanic</td>
<td>117</td>
<td>22</td>
<td>0</td>
</tr>
</tbody>
</table>

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

**Narrative**

Generally the CDBG, HOME and ESG programs serve the entire City of Kalamazoo in accordance with the program requirements of each grant because there is a need for services throughout the City’s 22 neighborhoods. However, the listed ethnic and racial populations assisted with these funds represent the at-risk population served in Edison, Northside, Oakwood, Southside, Douglas, Eastside, Stuart, Vine and the Central Business District. ESG was not awarded by HUD for PY2019
CR-15 - Resources and Investments 91.520(a)

Identify the resources made available - Updated

<table>
<thead>
<tr>
<th>Source of Funds</th>
<th>Source</th>
<th>Resources Made Available</th>
<th>Amount Expended During Program Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG</td>
<td>Public - Federal</td>
<td>$1,868,084</td>
<td>$173,657.92</td>
</tr>
<tr>
<td>HOME</td>
<td>Public - Federal</td>
<td>$492,146</td>
<td>$0.00</td>
</tr>
<tr>
<td>CDBG-CV</td>
<td>Public - Federal</td>
<td>$958,737</td>
<td>$0.00</td>
</tr>
</tbody>
</table>

Table 3 - Resources Made Available

Narrative

The table above outlines the Consolidated Plan awarded funding received between July 1, 2019 and June 30, 2020. HUD contracts were sign in December 2019. This table includes only new funds received during the program year and does not account for either unspent prior year funds used for FY2019 activities or funds from prior years spent during the 2019 program year. Source of drawn funds is from PR02 (IDIS Run Date: 02/02/21).

CDBG assistance was provided in low- and moderate-income communities as a result of City Commission’s approval. The boundaries of these areas make up nine at-risk districts (Edison, Northside, Oakwood, Southside, Douglas. Eastside, Stuart, Vine and the Central Business District). Per IDIS report PR26 – CDBG Financial Summary Report (IDIS run date: 02/02/21).

- Low/Mod benefit this reporting period – 80%
- Public Service Cap –15%
- Planning and Administration Cap –5%

Most activities undertaken utilize CDBG and HOME funds to prevent homelessness, reduce persons in poverty and improve the quality of life for Kalamazoo residents; either directly or indirectly. Homeless programs directly influence poverty. Projects that indirectly affect poverty include those that upgrade the community and provide affordable housing. Programs that prevent homelessness and improve quality of life include housing assistance) and supportive services. CDBG, HOME and ESG funds (as provided) are used to prevent homelessness and reduce the number of poverty level families.

Funds expended during the program year include reprogrammed prior year funds and funds awarded to activities in prior years that were not spent until the 2019-20 program year. Any large construction project will span the course of several program years with expenditures occurring over multiple years. As a result, funds expended will not equal funds received.
Identify the geographic distribution and location of investments

<table>
<thead>
<tr>
<th>Target Area</th>
<th>Planned Percentage of Allocation</th>
<th>Actual Percentage of Allocation</th>
<th>Narrative Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG-Eligible Census Tracts</td>
<td>56</td>
<td>51</td>
<td>51</td>
</tr>
<tr>
<td>City-wide low-income households</td>
<td>44</td>
<td>49</td>
<td>49</td>
</tr>
</tbody>
</table>

Table 4 – Identify the geographic distribution and location of investments

Narrative

Although, the City of Kalamazoo targets at-risk neighborhoods (Edison, Northside, Oakwood, Southside, Douglas, Eastside, Stuart, Vine and the Central Business District) funding is not allocated by census tract, but allocated to programs that services these neighborhoods. City program planning is focused toward the number of persons that can be helped, and identifying projects that will produce the best benefit for the investment.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

The City requires matching funds from both CDBG and HOME Investment Partnerships program. All subrecipients involved in these programs meet a 25% match.

Sometimes subrecipients and partners leveraged funds to complete a project. Leveraged funds are often 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.

Fiscal Year Summary – HOME Match

<table>
<thead>
<tr>
<th>Description</th>
<th>Match Available</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Excess match from prior Federal fiscal year</td>
<td>0</td>
</tr>
<tr>
<td>2. Match contributed during current Federal fiscal year</td>
<td>$53,500</td>
</tr>
<tr>
<td>3. Total match available for current Federal fiscal year (Line 1 plus Line 2)</td>
<td>$53,500</td>
</tr>
<tr>
<td>4. Match liability for current Federal fiscal year</td>
<td>0</td>
</tr>
<tr>
<td>5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)</td>
<td>0</td>
</tr>
</tbody>
</table>

Table 5 – Fiscal Year Summary - HOME Match Report
## Match Contribution for the Federal Fiscal Year

<table>
<thead>
<tr>
<th>Project No. or Other ID</th>
<th>Date of Contribution</th>
<th>Cash (non-Federal sources)</th>
<th>Foregone Taxes, Fees, Charges</th>
<th>Appraised Land/Real Property</th>
<th>Required Infrastructure</th>
<th>Site Preparation, Construction Materials, Donated labor</th>
<th>Bond Financing</th>
<th>Total Match</th>
</tr>
</thead>
<tbody>
<tr>
<td>New Horizon</td>
<td>12/08/20</td>
<td>29,500</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>29,500</td>
</tr>
<tr>
<td>Kalamazoo Valley Habitat</td>
<td>07/520</td>
<td>25,000</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>25,000</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>53,500</td>
</tr>
</tbody>
</table>

### Table 6 – Match Contribution for the Federal Fiscal Year
CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction’s progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

<table>
<thead>
<tr>
<th>Table 7 – Number of Households</th>
<th>One-Year Goal</th>
<th>Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Homeless households to be provided affordable housing units</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Number of Non-Homeless households to be provided affordable housing units</td>
<td>10</td>
<td>11</td>
</tr>
<tr>
<td>Number of Special-Needs households to be provided affordable housing units</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>137</strong></td>
<td><strong>14</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Table 8 – Number of Households Supported</th>
<th>One-Year Goal</th>
<th>Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of households supported through Rental Assistance</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Number of households supported through The Production of New Units</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Number of households supported through Rehab of Existing Units</td>
<td>120</td>
<td>57</td>
</tr>
<tr>
<td>Number of households supported through Acquisition of Existing Units</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>122</strong></td>
<td><strong>59</strong></td>
</tr>
</tbody>
</table>

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

Affordable housing continues to be a priority for the City of Kalamazoo. The City’s goal of improving 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 is intended to contribute to the overall affordable housing goals established in the 2019 – 2020 Consolidated Plan.

Activities related to affordable housing fell short this year due to the late release of funding and the COVID-19 Pandemic. With funding being release closer to fall in 2018 and 2019, Subrecipient planned their activities to start in the Spring of 2020 or to restart. In March of 2020 the City of Kalamazoo started closing down and immediately following the State of Michigan halted construction activities. In addition, Subrecipient reported that it was increasingly hard to find skilled labor. The shortage of skilled labor is currently being discussed with the City’s community college and area high school programs. The goal is to bring technical education back to address the shortage.

A barrier the City continues to encounter is the existence of more citizens in need of affordable housing than units available. In addition to the construction and rehabilitation of affordable housing and the rental and homeowners assistance programs completed in PY2019, the City continues to take the following actions to eliminate barriers to affordable housing:

1. The City of Kalamazoo's Code Enforcement and Anti-Blight efforts, funded with CDBG, have as their main objective the redevelopment of a suitable living environment through the identification and resolution of non-compliant and/or blighted housing units to be made available for low- and moderate-income households. This strategy increases the number of decent, code-compliant, affordable housing units in the City.
2. To eliminate the barrier of a lack of capacity and technical assistance required to provide affordable housing, the City of Kalamazoo utilized general fund dollars for the Local Initiatives Support Corporation to provide capacity building and technical assistance to housing, CHDO, and nonprofit organizations operating within Kalamazoo. The capacity and productivity of these organizations is an important element in addressing current barriers to the provision of affordable housing.

Discuss how these outcomes will impact future annual action plans.

The City of Kalamazoo’s primary focus continues to be affordable housing and monitors its progress against five-year affordable housing goals. It has also prioritized the development and construction of affordable housing during Program Year 2019 and beyond utilizing city, federal, and private resources (including institutional lenders and Foundation for Excellence dollars). The City is looking closely at the capacity of homeless housing providers as well as the extent to which the developers continue to participate in the production of permanent supportive housing for low to moderate income persons. The City will reevaluate its progress against five-year goals and adjust future Action Plan goals as needed on an annual basis.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

<table>
<thead>
<tr>
<th>Number of Persons Served</th>
<th>CDBG Actual</th>
<th>HOME Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>Extremely Low-income</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Low-income</td>
<td>4</td>
<td>1</td>
</tr>
<tr>
<td>Moderate-income</td>
<td>53</td>
<td>4</td>
</tr>
<tr>
<td>Total</td>
<td>59</td>
<td>5</td>
</tr>
</tbody>
</table>

Table 9 – Number of Persons Served

Narrative Information

The City of Kalamazoo is continuously working to support the lowest income earners in our community, and those who are cost burdened by spending more than 30% of their income on housing. The accomplishment data in Table 9 represents all beneficiaries of CDBG, as well as HOME beneficiaries, to include Affordable Housing Development Programs, and all Housing Repair Programs.
Evaluate the jurisdiction’s progress in meeting its specific objectives for reducing and ending homelessness...

The Point In Time count for 2020 included 639 homeless individuals; a reduction of 9% from the PIT count of 702 in 2019. The City partners with the county’s Continuum of Care (CoC). The CoC partners with 30+ diverse organizations that collaborate as a system to fund prevention, shelters, permanent and supportive housing.

Local Initiative Support Corporation (LISC) convened various stakeholder meetings surrounding a revamped CoC. On January 15, 2020 LISC’s advisory board, which has functioned as the CoC Governance body, approved a transition of the CoC from LISC to the United Way of the Battle Creek and Kalamazoo Region (UWBCKR). The proposed transition included key changes to the structure of the CoC. These include: (1) the establishment of a dedicated CoC Local Board that meets all HUD representational requirements and that has at large seats that are filled by CoC membership vote; and (2) increased staff capacity to three full time positions including a CoC Director to lead strategic and collaborative activities, a CoC Associate to manage the technical aspects of HUD and MSHDA compliance and processes, and an HMIS System Administrator to provide oversight and guidance for the day-to-day operations of the HMIS system. In May of 2020 UBCKR began onboarding those three staff positions.

Together with our partner agencies, we provide the following continuum of services: (1) Prevention & Access - people at imminent risk of homelessness are linked to community resources. We take a proactive approach to keeping people housed, educating and advocating on related issues. (2) Response & Rapid Re-Housing - people experiencing homelessness receive assistance to address their immediate housing crisis. We work to get homeless people into permanent housing as quickly as possible, and to creating new, affordable housing options. (3) System Change & Transition - we ensure access to supportive services and improve system effectiveness so people can transition from crisis to stability. (4) Build Community Capacity - by coordinating local, state, and national resources in the community we improve agency capacity to serve, track our progress, and bring resources and public policy support solutions to end homelessness.

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

The CoC seeks to find and engage unsheltered persons by utilizing outreach teams and local Public Safety Departments. Catholic Charities provides Street Outreach services for runaway and homeless youth, Integrated Services of Kalamazoo outreach staff and peer supports focus on individuals and provides general and family outreach. The CoC collaborates with local nonprofit service providers, City and County government, public safety and public health departments to coordinate outreach for people who are unhoused and/or living in encampments. Outreach efforts include centralized intake with assessment at area shelters, outreach satellite locations, and the public school’s homeless liaisons. Additional outreach locations include Health & Human Services, Goodwill, Michigan Works and the Gospel Mission. Additionally, community partners offer a weekly Community Housing Hour; residents can access five - ten community agencies offering housing information. The local drop-in center, open daily, provides meals, phones and coordinated access referrals. The CoC distributes cards with all emergency contact information to churches, shelters and drop-in facilities. A local 24-hour HELP-Line is available to anyone in crisis. The CoC has utilizes a single assessment tool for people experiencing homelessness. The Service Prioritization Decision Assistance Tool (SPDAT) provides an evidence-informed assessment that measures acuity of participants. Based on the SPDAT scores, clients are prioritized with those most vulnerable placed as the top priority for available housing resources.
Addressing the emergency shelter and transitional housing needs of homeless persons

The CoC agencies understand that to transition a family from the street or a shelter setting to permanent housing involves the leveraging of a complex array of community resources to meet interwoven housing and non-housing needs. Case Management is essential in helping families navigate the “system” to find resources that help increase their income and ability to sustain positive housing options. Our CoC Navigators from partner agencies work together to address systems imposed issues/barriers. 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.

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

Our partner agencies provide, Prevention & Access. We take a proactive approach to keeping people housed; educating and advocating on related issues. Response & Rapid Re-Housing; People experiencing homelessness receive assistance to address their immediate housing crisis. We work to get homeless people into permanent housing as quickly as possible; and to creating new, affordable housing options. System Change & Transition; We ensure access to supportive services and improve system effectiveness, so people transition from crisis to stability. Build Community Capacity; By coordinating local, state, and national resources in the community; we improve agency capacity to serve; track our progress and bring resources and public policy support solutions to end homelessness. One of the CoC’s goals in coming year is working to strengthen partnerships to prevent homelessness after discharge from public funded institutions.

The Sheriff’s Department assistance on supports to sustain housing is made available at discharge, if requested by the inmate. The CoC provides a single assessment and referral point of entry for all housing related emergencies in partnership with 2-1-1 staffed with Housing Resource Specialists who provide access to resources and mainstream service providers including information about applying for SSI and SSDI.
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.

As of January 2020, the MI-507 Kalamazoo CoC has a fully functioning Coordinated Entry System. The Coordinated Entry system was implemented with an aim to end homelessness in the community by improving how we assign housing opportunities based on appropriate tools and effective targeting efforts. The CE process is intended to quickly triage people in a housing crisis to available resources. Individuals and households experiencing homelessness can enter the system, be assessed, and be referred to available housing options within less than two weeks.

The intention of Coordinated Entry is to: (1) target the correct housing intervention to the correct individual and/or family, particularly for those with high acuity and high need; (2) divert people who can solve their own homelessness away from the system; (3) greatly reduce the length of time people are experiencing homelessness by quickly moving people into the appropriate housing; and (4) significantly increase the likelihood of housing stability by better targeting the appropriate housing intervention to the corresponding needs.

“Landlord Liaisons” are key to housing the homeless; we have many scatted site locations and few multi-family projects. CoC funded agencies have “low barrier” entry approaches including tenant screening practices that promote applicant acceptance regardless of their sobriety or use of substances, completion of treatment, and participation in services. The YWCA has a 64-bed shelter, counseling, referral and advocacy services for residential and non-residential clients, two intensive post-shelter programs and other collaborative programming with numerous community organizations. Non-residential clients or other individuals are referred to the CoC coordinated access and assessment agency that maintains a hot-line and family shelter. The Housing Choice Vouchers (HCV) stabilize people living in homelessness, allowing them to cope with and conquer addictions, re-gain physical and mental health, find employment and complete educational or other goals. The coordinated assessment agency maintains a list of homeless people ensures that HCVs go to the people most in need of housing. To keep the HCV placement list populated the CoC works with and engages on-site at the local shelters so that chronically homeless people are entered on the waiting list and work with the HCV Agent to know when/where turnover is occurring and they help to locate persons and identify housing. The Housing Assessment and Resource Agency (HARA) serves all populations and works with all providers and their outreach teams who serve special populations.
CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The City of Kamalazoo does not have public housing. However, Kalamazoo County does have a public housing commission for the purpose of administering a housing voucher program for the area. The City of Kalamazoo continues to be supportive of the Public Housing Commission 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.

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

Actions taken to provide assistance to troubled PHAs

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

The City of Kalamazoo Community Development (CD) continues to strategically invest in key neighborhoods within the City that have been hit hardest by poverty, the City’s subsequent economic expansion if not carefully monitored could present a risk of gentrification. Kalamazoo focuses on the development of eco-friendly affordable housing, sustainable economic development, and an expansion of neighborhood services through its Foundation for Excellence Program. The program continues to support the following City goals:

- Shared Prosperity – Abundant opportunities for all people to prosper.
- Connected City – A city that is networked for walking, biking, riding, and driving
- Inviting Public Places – Parks, arts, culture, and vibrant streets
- Environmental Responsibility – A green and healthy city
- Safe Community – Creating a safe environment for living, working, and playing.
- Youth Development – A city with places and supports that help young people thrive
- Complete Neighborhoods – Residential areas that support the full range of people’s daily needs
- Strength Through Diversity – An inclusive city where everyone feels at home
- Economic Vitality – Growing businesses and stabilizing the local economy to the benefit of all.
- Good Governance – Ensuring the City organization has the capacity and resources to effectively implement the community’s Strategic Vision in a sustainable way.

Community Development, along with non-profit developers, continues to assess the feasibility of the conversion vacant residential structures to affordable housing units throughout the six identified census tracts. In addition, the City continues to work with non-profit developers to offer an affordable financing to property owners.

In addition to the rehabilitation of affordable housing and the rental and homeowners assistance programs completed in 2019 the City continued to take the following actions to eliminate barriers to affordable housing:

- Redevelopment of suitable living environments and the develop a Code Enforcement Repair program to address code violations for citizens who are experiencing severe financial issues.
- Utilized general fund dollars for the Local Initiatives Support Corporation to provide capacity building and technical assistance to housing, CHDO, and nonprofit organizations operating within Kalamazoo.
- Staff concentrated on project and program delivery through the use of proactive approaches towards applications for federal and state leverage funds; this assisted CP&D to strategically place future activities in line to address obstacles.
- Increased internal efficiencies and realigning of program and services delivery to meet increased programmatic and administrative demands within provider network. CP&ED staff worked collaboratively with City officials, as well as the Parks, Transportation, Public Safety, Public
Services, and Economic Development to identify projects that met federal community
development program eligibility and meet timely draw down requirements.

CPED staff in 2019 continued to fine-tune approaches to help ensure projects readiness inspite of
COVID-19 Pandemic.

**Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

Reduced and limited funding remains to be the largest barrier to meeting underserved needs in
Kalamazoo. Like many entitlement communities, Kalamazoo's CDBG funding continues to experience a
reduction in funding. Reductions in State aid to the City of Kalamazoo and the local budget have
prohibited the City from being able to cover funding gaps, leaving many worthy and valuable programs
unfunded or under-funded. This challenge is beyond the capacity of the local jurisdiction to satisfactorily
address. Where practical the City has strongly encouraged organizations to consider collaborating in the
provision of serves to low-income residents in an effort to improve efficiency, strengthen capacity, and
best meet the needs of the underserved. In addition, the City provides technical assistance to providers
in their pursuit of other federal, state, or private funding sources.

**Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

The City of Kalamazoo Community Planning and Economic Development (CPED) is committed to
carrying out a comprehensive anti-poverty strategy in collaboration with the many community and
nonprofit organizations that also serve Kalamazoo's low income population. The City's CDBG, HOME and
other local funding will continue to support programs and organizations that provide assistance and
economic opportunities for low- and moderate-income persons and for populations with special needs.
Funds will continue to be used to support subsidized housing and economic growth of low income. The
City and other agencies will continue to collaborate in pooling necessary resources to assist individuals
and families with obtaining the tools to overcome poverty. The City in partnership with City partners
has a comprehensive slate of anti-poverty plans and programs meant to address a continuum of needs
from crisis to self-sufficiency, highlights of which are:

- Shared Prosperity Kalamazoo - a bold and ambitious plan to transform our community into a
place where every adult and every child thrives and prospers.
- Foundation for Excellence - a unique innovation by the City of Kalamazoo and private donors
to address systemic challenges to the prosperity of the city.
- Imagine Kalamazoo - is all about engagement: engagement with citizens, community groups,
businesses, developers, investors, philanthropists, government discussing it, planning it,
designing it, and acting on it.
- Open Doors Kalamazoo – an organization that provide a solution to the housing crisis for
low-wage working families. It assist those who don’t earn enough to afford an apartment,
those who are fleeing domestic violence and have no resources for safe housing.
- Kalamazoo Gospel Mission - is a non-profit organization that provides support to
homeless citizens in southwest Michigan. It offers short-term emergency shelter and
food, as well as a variety of long-term programs to address homelessness issues.
- Ministries with Communities - Serves as a daytime shelter, resource center, offers prepared
meals to the Kalamazoo community experiencing homelessness, poverty, mental illness and
other challenges.
Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The City of Kalamazoo has a solid institutional structure that includes local government, the school district, and area non-profits, and city staff who has developed good working relationships with many of the executive directors and staff of the non-profit agencies that request CDBG and/or HOME funding. City staff participated in a number of community boards that met to address the needs of homeless persons, underserved populations, and low-income residents, including the Continuum of Care (CoC) committee and its allocations committee.

Since 2006, the Local Initiatives Support Corporation has assisted in the coordination of housing development efforts on a county-wide basis. They have a coordinator that works effectively with all of the key partners and jurisdictions to encourage such concepts as inclusionary zoning and fair share housing. In addition, the Continuum of Care managed by Local Initiatives Support Corporation is a collaboration of nonprofit, business, governmental, education, health, human service, advocacy entities, and constituent groups formed to develop a comprehensive and integrated approach to addressing homelessness and building permanent housing for low-income people.

For FY2019, the City supported five neighborhoods (Oakwood, Vine, Northside, Eastside, and Edison) with the highest level of poverty in completing organizational assessments and plans. The goal of the project is to assist Neighborhood Associations in growing their capacity to serve their neighborhoods, while achieving the vision set forth in their respective neighborhood plans. Upon completion of capacity building plans the City will support the neighborhoods in trainings, implementation and completion of projects that will support organizational growth following the plans created.

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

To better link services to targeted populations, CP&D staff also maintains relationships with various organizations, and local, state and federal agencies including but not limited to, the Department of Health and Human Services (DHHS), and HUD.

The City of Kalamazoo also strives to maintain records for provider contacts, titles, and responsibilities for local non-profits and service agencies. The City annually interview and discuss the needs of the community with organizations throughout City's during its CDBG/HOME application process. This information influences how the funds are allocated and the goals are established as a City. The City does not have a housing authority, but maintains a good working relationship with the County's housing commission and other housing agencies serving residents of Kalamazoo. The City's involvement with the CoC has provided opportunities to building relationships with a wider range of housing and service providers in the region as well.

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

The City of Kalamazoo affirmative marketing policies and procedures for affordable housing goal is to ensure that all persons – regardless of their race, color, national origin, age, religion, sex, gender identity, disability, familial status or English proficiency – are aware of the affordable housing opportunities generated by federal HOME funds, the City funded housing activities, and any other program activities, in accordance with 24 CFR 108.1. The City uses the following methods for informing the public, owners, and potential tenants about fair housing:
1. The City of Kalamazoo Community Planning and Development Department shall be responsible for implementing the City’s Affirmative Marketing Policies and Procedures.

2. Recipients of CDBG, HOME and/or City funds shall be informed of the City’s Affirmative Marketing policies by having this policy referenced in the agreement as an attachment with the City for the receipt of funds and by making compliance with this policy a requirement for the duration of the agreement.

3. The City shall continue to support outside agencies to provide fair housing information/referral and case investigation services and tenant/landlord information/referral and mediation services.

4. The City collaborates with the County of Kalamazoo and the Fair Housing Center of Southwest Michigan to reduce discrimination in housing regionally.

5. The City shall carry out outreach and provide tenants and rental property owners with copies of the State of Michigan handbook on tenant and landlord rights and responsibilities, fair housing brochures, and Affirmative Marketing Policies and Procedures.

6. The City provides information about fair housing, fair housing services providers and links on the City’s website.

7. The City shall ensure that owners of CDBG and/or HOME funded rental/homebuyer housing provide information during monitoring visits on how their actions have complied with the City’s Affirmative Marketing Policies and Procedures.

8. The City shall periodically post flyers and brochures which describe fair housing laws and services, in the City Hall Center Lobby, which is open to the public.

9. Housing project owners shall instruct all employees and agents in writing and orally in the policy of nondiscrimination and fair housing.

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

The City of Kalamazoo along with the Department of Health and Human Services and CP&D have taken actions to reduce lead-based paint (LBP) hazards in accordance with HUD regulations. The City received a grant from the Office of Lead Hazard Control and Healthy Homes Lead Hazard Control (OLHCHH) in 2019 to address lead issues the City of Kalamazoo applied and was awarded a Lead Based Paint Hazard Reduction grant. Purpose is to identify and control lead based hazards. Focus is on homes with children under six year of age. The specifics of the grant are as follows.

- Grant period is 1/1/2019 – 6/30/22
- Grant award is $1,999,362. We were awarded full amount of request.
- Number of houses - 72  60% homeowner/40% rental
- Grant was written in collaboration with Kalamazoo Neighborhood Housing Services
- Grant uses approximately $200,000 of future CDBG funding as a match.

Lead in the City of Kalamazoo is a high priority due to the Michigan Department of Community Health, Michigan State University and Michigan Department of Energy, Labor and Economic Growth, in 2012, produced a report on blood lead levels among children in fourteen target communities which included the City of Kalamazoo. Based on their findings, the City of Kalamazoo was in the top seven highest for confirmed elevated blood lead levels in children. As
a result of this finding lead based paint became a significant concern especially in light of the City’s desire to rehabilitate older housing stock and to maintain affordable housing. According to the U.S. Census, 84 percent of the housing stock in the City was built prior to 1979 and tend to be concentrated in the lower income neighborhoods.

The City includes lead hazard reduction strategies in repairs on rental properties inspected under the City Housing Code. The City inspects all rental properties at least once every three years. When potential or existing problems are located, inspectors require appropriate remedial action. In addition to the lead based paint disclosure rule of 1996, the City of Kalamazoo requires its Subrecipients to comply with the September 15, 2000 regulation, “Requirements for Notification, Evaluation and Reduction of Lead Based Paint Hazards in Federally-Owned Residential Property and Housing Receiving Federal Assistance.”
CR-40 - Monitoring 91.220 and 91.230

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

In addition to the monthly progress reports completed by Subrecipients, some form of monitoring is a part of every activity undertaken by the City. Mandatory “Pre-Award Training” are required for all sub-recipients for CDBG and or HOME projects, during the application process, each potential Subrecipient identifies the role they will play in the City’s consolidated plan. Routine desk reviews on eligible expenditures and beneficiary data are conducted on each claim. The City maintains ongoing contact with Subrecipients including phone calls, emails, site visits to meet with the director and board members, as needed, to ensure the program is meeting the standards established for the programs.

To implement effective federal entitlement funding, activities are monitored or technical assistance is provided on a consistent basis. Visits are prioritized by determining if any organizations are considered high-risk. High-risk sub-recipients include: new (first-year) sub-recipients; those with high staff turnover; sub-recipients with previous compliance or performance problems; sub-recipients executing complex activities for the first time. Sub-recipients’ files are reviewed for compliance with all regulations governing its administrative, financial, procurement and programmatic operations. Sub-recipients are also monitor in respect to their performance objectives.

Monitoring visits assist in determining if the subrecipient is carrying out its program and activities within the timeline denoted in the subrecipient agreement. It also ensures that the required records are maintained to demonstrate compliance with applicable regulations. CP&D regularly monitors HOME-assisted properties to confirm that residents qualify for HOME designated units and borrowers comply with regulatory requirements as outlined in property agreements. CP&D’s CDBG administrative staff conduct monitoring reviews of each subrecipient every one to two years to ensure program compliance with HUD regulations. Technical assistance was conducted throughout the 2019 year to various Subrecipients including City of Kalamazoo staff for various projects. In 2019, CP&D staff provided technical assistance to the Providers. CP&D staff monitors ESG contracts monthly for compliance, financial management systems and programmatic activity. LISC administered the ESG program and funds for 2019. Additionally, staff is committed to providing accurate non-duplicative demographic information in IDIS to comply with HUD’s reporting requirements.

Citizen Participation Plan 91.105(d); 91.115(d)
Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The City of Kalamazoo encourages residents and other interested parties to participate in the CDBG process by attending public meetings and submitting comments if unable to attend. Residents are given a minimum of 15 days to comment on the CAPER before it is submitted to HUD for approval. Any comments received are included in the final submission to HUD with a response. In recent years we included acceptance of email submissions to make it even easier for residents to participate in the process.

To get the word out, the City of Kalamazoo issues press releases to notify the public of upcoming meetings, fund availability, and how to submit comments. These ensure a multi-media approach of notifications including local newspapers, newsletters, city website posting and social media networks.

Following the approved Citizen Participation Plan, the 2019 CAPER was made available to the public September 28 – October 12, 2019. A public notice was published in the Kalamazoo Gazette and posted on the CP&D’s website.
On October 10, 2019 during the 15-day public comment period a question and answer session was held during the City’s regularly schedule public Community Development Act and Advisory Committee meeting. All Kalamazoo residents were invited to attend. The City of Kalamazoo responded to one citizen comment during the CAPER “Question and Answer Session”, which addressed 2020 application process.
Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

No changes were made to programs or to program objectives in 2019. The City of Kalamazoo followed the 2019 Annual Action Plan as submitted and approved by HUD.

<table>
<thead>
<tr>
<th>Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?</th>
<th>No</th>
</tr>
</thead>
</table>

[BEDI grantees] Describe accomplishments and program outcomes during the last year.
Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

<table>
<thead>
<tr>
<th>Address</th>
<th>#Units</th>
<th>HOME Funds Invested</th>
<th>Affordability Period</th>
<th>Start Date</th>
<th>End Date</th>
<th>Compliance</th>
</tr>
</thead>
<tbody>
<tr>
<td>1336-1348 Portage Rd</td>
<td>(4) 16</td>
<td>240,000</td>
<td>15</td>
<td>10/31/11</td>
<td>10/31/26</td>
<td>In Review</td>
</tr>
<tr>
<td>2233 Flower St</td>
<td>(7)56</td>
<td>850,000</td>
<td>20</td>
<td>1/16/06</td>
<td>01/16/26</td>
<td>In Review</td>
</tr>
<tr>
<td>3840 S. Burdick</td>
<td>(10)24</td>
<td>400,000</td>
<td>20</td>
<td>01/09/04</td>
<td>01/09/24</td>
<td>In Review</td>
</tr>
<tr>
<td>1801 N. Westnedge</td>
<td>(3)40</td>
<td>380,000</td>
<td>15</td>
<td>01/20/11</td>
<td>01/20/26</td>
<td>In Review</td>
</tr>
<tr>
<td>345 N. Burdick</td>
<td>59</td>
<td>645,447</td>
<td>20</td>
<td>09/25/12</td>
<td>09/25/32</td>
<td>In Review</td>
</tr>
<tr>
<td>4774 Horton Drive - part of 3939 S. 12th Street</td>
<td>68</td>
<td>550,900</td>
<td>20</td>
<td>01/03/05</td>
<td>01/03/25</td>
<td>In Review</td>
</tr>
<tr>
<td>727 Mabel</td>
<td>1</td>
<td>15,033</td>
<td>10</td>
<td>11/7/07</td>
<td>10/25/17</td>
<td>In Review</td>
</tr>
<tr>
<td>332 Hutchinson</td>
<td>1</td>
<td>63,480</td>
<td>15</td>
<td>03/05/13</td>
<td>03/05/28</td>
<td>In Review</td>
</tr>
<tr>
<td>926 Albert</td>
<td>1</td>
<td>66,170</td>
<td>15</td>
<td>03/05/13</td>
<td>03/05/28</td>
<td>In Review</td>
</tr>
<tr>
<td>309 W. North</td>
<td>4</td>
<td>126,000</td>
<td>20</td>
<td>1/27/15</td>
<td>1/27/35</td>
<td>In Review</td>
</tr>
<tr>
<td>303 &amp; 305 &amp; 307 W. North</td>
<td>3</td>
<td>136,217</td>
<td>20</td>
<td>1/27/15</td>
<td>1/27/35</td>
<td>In Review</td>
</tr>
<tr>
<td>701 N. Pitcher St</td>
<td>12</td>
<td>250,000</td>
<td>15</td>
<td>05/07/07</td>
<td>05/07/22</td>
<td>In Review</td>
</tr>
<tr>
<td>214 S. Sage St</td>
<td>(2)38</td>
<td>140,000</td>
<td>20</td>
<td>10/11/11</td>
<td>10/11/31</td>
<td>In Review</td>
</tr>
<tr>
<td>1226 Washington</td>
<td>1</td>
<td>59,851.93</td>
<td>15</td>
<td>3/17/17</td>
<td>3/31/19</td>
<td>In Review</td>
</tr>
<tr>
<td>1230 Washington</td>
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<td>40,564</td>
<td>15</td>
<td>3/17/17</td>
<td>3/31/19</td>
<td>In Review</td>
</tr>
<tr>
<td>105 E. Michigan</td>
<td>(4)28</td>
<td>400,000</td>
<td>15</td>
<td>05/07/12</td>
<td>05/07/27</td>
<td>In Review</td>
</tr>
<tr>
<td>115 Fellows (KNHS)</td>
<td>1</td>
<td>70,637</td>
<td>15</td>
<td>09/18/18</td>
<td>09/18/33</td>
<td>In Review</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td>182</td>
<td><strong>$4,038,299.93</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Additional hired staff will assist in completing reviews to ensure compliance.

Provide an assessment of the jurisdiction’s affirmative marketing actions for HOME units. 92.351(b)

The City requires each CHDO and private developer-funded through the HOME program to submit an affirmative marketing plan or to utilize the City’s HUD-approved affirmative marketing plan when there are five or more assisted HOME units developed. This requirement is a mandatory condition in every CHDO agreement. Affirmative marketing steps consist of actions to provide information and attract eligible persons in the housing market without regard to race, ethnicity, national origin, sex, religion, familial status, or disability. This could include initiatives such as using the Equal Housing Opportunity logo in publications and signage and displaying fair housing information. Additionally, the City actively encourages housing developers to make subcontracting opportunities available to minority and womenowned businesses (MBE/WBE).
Data on the amount and use of program income for projects, including the number of projects and owner and tenant characteristics.

No HOME program income was received during 2019.

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

The following activities helped to foster and maintain quality affordable housing in the City of Kalamazoo:

- Community Development Advisory Action Committee
- City of Kalamazoo, CPD – Code Enforcement
- City of Kalamazoo, CPD – Emergency Housing Repair
- City of Kalamazoo, CPD – Lease Purchase Program
- City of Kalamazoo, CPD – HOME Housing Repair
- Housing Resource Incorporated
- Energy Efficiency: In order to foster housing affordability and assist households to maintain quality energy efficient housing, the City adopted HUD’s policy requiring energy star specifications for new construction and substantial rehabilitation projects.
The City of Kalamazoo did not receive ESG funding for 2019 program year.

**Reporting Period—All Recipients Complete**

<table>
<thead>
<tr>
<th>Description</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Program Year Start Date</td>
<td>07/01/2019</td>
</tr>
<tr>
<td>Program Year End Date</td>
<td>06/30/2020</td>
</tr>
</tbody>
</table>

3a. Subrecipient Form – Complete one form for each subrecipient
Subrecipient or Contractor Name: KALAMAZOO

City: KALAMAZOO
State: MI
Zip Code: 49007,
DUNS Number: 079283214
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 1236410