

2019 Action Plan

First Year Annual Action Plan
Of
2019-2023 Consolidated Plan
Substantial Amendment - 4

DRAFT



Prepared for:
Community Planning & Economic
Development
Community Investment Division
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Action Plan

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) 2019 Annual Action Plan (July 1, 2019 through June 30, 2020) represents the fifth program year in which to address the needs identified in the City of Kalamazoo's 2019 - 2023 Consolidated Plan, approved by the Kalamazoo City Commission on May 06, 2019.

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 use approximately **\$4,202,194**, in PY2019 funding through the **CDBG (\$1,615,035) and HOME (\$492,146)** federal entitlement grants. The City and its Subrecipients will also utilize approximately **\$120,680, in anticipated program income** in PY2019. The City has unallocated prior year CDBG program funds in the amount of **\$132,369** to be allocated. The City was allocated **\$958,737** in **CDBG-CV -1** and **\$482,782** in **CDBG-CV-3** by HUD in response to COVID-19 Pandemic. The complete available budget to include COVID-19 funding for **PY2019 totals \$3,987,826.**

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 2019 - 2023 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.

COVID-19

The City of Kalamazoo was notified on April 2, 2020 that we will be receiving \$958,737 in FY20 CDBG-CV funding. HUD has advised entitlement communities to amend their 2019 AAP documents because the 2020 plans have not been approved. The numbers below under Expected Resources and in the Annual Goals & Objectives include the CDBG-CV

funds.

The City of Kalamazoo was notified on September 11, 2020 that we will be receiving \$482,782 in FY20 CDBG-CV funding. HUD has advised entitlement communities to amend their 2019 AAP documents to reflect this award. The numbers below under Expected Resources and in the Annual Goals & Objectives include CDBG-CV – 1 and CV-3 allocations.

PY2019 Action Plan Budget - Amended May 2020, January 2021, September 2022

SOURCES	
CDBG Allocation	\$1,615,035
CDBG Prior Years Unallocated Funds	\$132,369
CDBG Anticipated Program Income	\$120,680
HOME Allocation	\$492,146
HOME Prior Year allocated Funds	\$186,077
CDBG -CV -1	\$958,737
CDBG-CV -3	\$482,782
TOTAL 2019 FUNDS AVAILABLE	\$3,987,826

USES		
Agency	Activity Name	Funding
CDBG - ADMINISTRATION¹		
City of Kalamazoo	Administration	\$323,007
Subtotal:		\$323,007
CDBG - GENERAL		
City of Kalamazoo	Code Administration	\$400,000
City of Kalamazoo	Demolition	\$100,000
Subtotal:		\$500,000
CDBG - PUBLIC SERVICE²		
City of Kalamazoo Public Safety	Crime Prevention	\$150,000
United Way of Battle Creek and Kalamazoo Region	Continuum of Care	\$20,000

¹ CDBG Planning and Administrative Services are subject to a 20% cap.

² CDBG Public Service activities total is subject to a 15% cap.

Ministry with Community	Homeless Prevention	\$30,000
City of Kalamazoo	P&R Youth Development	\$36,855
Subtotal:		\$236,855
CDBG - AFFORDABLE HOUSING		
Senior Services, Inc.	Home Repair for the Elderly	\$125,000
Community Homeworks	Critical Home Repair & Weatherization Program	\$125,000
City of Kalamazoo	Lead Base Paint Hazard Reduction Program	\$94,542
City of Kalamazoo	Code Enforcement Pilot Program	\$125,000
Kalamazoo Neighborhood Housing Services	Down Payment Assistance	\$75,000
Subtotal:		\$544,542
*CDBG - Neighborhood Enhancement		
City of Kalamazoo	Target Neighborhood	\$200,000
Subtotal:		\$200,000

*CDBG-CV (CARES Act Special Allocation)		
Agency	Activity Name	Funding
City of Kalamazoo	Administration	\$114,554.75
Housing Resources, Inc.	Rental Assistance	\$719,053.00
United Way	Small Business Assistance	\$239,684.25
Senior Services	Food Assistance	\$ 25,000.00
Housing Resources, Inc.	Subsistence Payments	\$343,227.00
N/A	Emergency Hotel Stays	\$ 0
TOTAL CDBG-CV PROGRAM ALLOCATIONS:		\$1,441,519.00

ANTICIPATED PROGRAM INCOME		
Agency	Activity Name	Funding
City of Kalamazoo	Small Business Revolving Loan	\$11,280

Kalamazoo Neighborhood Housing Services	Minor/Emergency Roof Repair	\$95,000
Community Homeworks	Critical Minor Home Repair	\$14,400
Anticipated Program Income Total		\$120,680

HOME		
Agency	Activity Name	Funding
City of Kalamazoo	Administration ³	\$49,214
New Horizon	Rental Rehab	\$118,000
KVHH - CHDO	Home Ownership (New Build) ⁴	\$100,000
City of Kalamazoo	Affordable Housing Program	\$411,008
HOME TOTAL HUD ALLOCATION:		\$678,222

³ HOME Program Administration is subject to a 10% cap.

⁴ CHDO Set Aside of \$73,821 included in this amount.

Table 1 - Expected Resources – Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan:	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public and Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,615,035	120,680	132,369	1,626,724	7,472,336	These funds will leverage City dollars through public infrastructure investment and other City services. In addition, other State and Federal funds will be leveraged by City Subrecipients for housing activities.
HOME	Federal	Acquisition, Homebuyer assistance, Lease Purchases, Rehab, Multifamily rental rehab, New construction	492,146	0	0	492,146	1,968,584	HOME dollars will leverage additional HOME funds from MSHDA, as well as possible low-income housing tax credits depending on the projects funded.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan:	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
OTHER	Public and Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	CV-1 958,737 CV-2 482,782 1,441,519	0	0	1,441,519	0	CDBG-CV funds will be utilized for planning and administration, subsistence payments, food assistance, economic development and emergency hotel stays.

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 leverage 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.

Acceptable Sources of HOME Match

- Local or State general revenues
- Housing trust funds
- Foundations, donations
- Program income from HODAG, RRP or UDAG only after grant closeout
- Value of waived taxes, fees, or charges
- Appraisal value of land or real property not acquired with Federal Funds
- Difference between appraised value and acquisition cost, if property is a acquired with Federal funds
- Grant equivalent of below market
- Interest rate loans to the project
- The cost of investments, not made with federal resources, in on and off-site infrastructure that is directly required for the affordable housing assisted with HOME funds
- Federal Home Loan Bank grants
- Value of donated material or labor
- Direct cost of supportive services that facilitate independent living or as part of a self-sufficiency program
- Direct cost of homebuyer counseling for families that complete a HOME assisted purchase

If appropriate, describe publicly 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

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

Table 2 – Goals Summary

#	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2019	2024	Affordable Housing Non-Housing Community Development Public Services	City-wide low-income households CDBG-Eligible Census Tracts	Rehabilitation of Existing Units, Acquisition, Production of New Units, Down Payment Assistance, Public Services, COVID-19 Pandemic Response	CDBG: \$569,541 HOME: \$529,008 CDBG-CV: \$1,062,280	Household/Housing Unit Homeowner Housing Rehabilitated: 130 Down Payment Assistance: 10 Rental units rehabilitated: 2 Homeowner Housing Added: 2 Direct Financial Assistance: 10
2	Homeless Assistance	2019	2020	Homeless Outreach	City-wide low-income households	Homeless Outreach,	CDBG: \$50,000	Persons Assisted: 140
3	Neighborhood Enhancement	2019	2023	Non-Homeless Special Needs Non-Housing Community Development	CDBG-Eligible Census Tracts	Public Improvements/Infrastructure, Public Services, Neighborhood Enhancements	CDBG: \$800,000	Homeowner Housing Rehabilitated: 125 Buildings Demolished: 3 Housing Code Enforcement: 1132
4	Youth Development	2019	2020	Non-Housing Community Development	City-wide low-income households	Public Services, Neighborhood Improvements	CDBG: \$36,855	Persons assisted: 300
5	Economic Development	2020	2024	Non-Housing Community Development	CDBG-Eligible Census Tracts	Economic Development, COVID-19 Pandemic Response	CDBG-CV: \$239,684	Businesses Assisted: 95

Table 3 - Goal Descriptions

1	Goal Name	Affordable Housing
	Goal Description	<p>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.</p> <p>Additionally, this goal funds public services to promote housing access and stability through subsistence payments.</p>
2	Goal Name	Homeless Assistance
	Goal Description	<p>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.</p> <p>Funds will be used to invest in proven strategies to reduce the number of homeless individuals on the streets. Agency funded activities will include canvassing for clients, engaging clients, accessing or providing emergency and crisis intervention services, assessing clients, crisis intervention counseling, case management, providing access to any available entitlements, benefits, housing or other resources, direct provision of and/or referrals and linkages to health and/or behavioral health Services, and transportation of clients. The City will require funded agencies to specifically focus on chronically homeless individuals.</p>
3	Goal Name	Neighborhood Enhancement
	Goal Description	<p>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.</p>
4	Goal Name	Youth Development
	Goal Description	<p>Develop well-adjusted and productive youth through supporting youth programs and activities that provide recreational opportunities to low- and moderate-income people by funding staff to coordinate and manage programs at park facilities and the creation/improvement of parks and playgrounds.</p>
5	Goal Name	Economic Development
	Goal Description	<p>This goal supports small businesses in addressing safety and other concerns related to COVID-19.</p>

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):

Below are an estimated number of extremely low-income, low-income and moderate-income families the City will be assisting:

2222 Disabled rental households at or below 80% of area median income with new affordable rental housing; 20% of these units will be further restricted to households at or below 50% of area median income.

2222 households at or below 80% of area median income with homebuyer assistance.

222 households at or below 80% of area median income with new housing for ownership.

22222 households at or below 80% of area median income with owner occupied rehabilitation or reconstruction.

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AP-35 Projects – 91.220(d)

Introduction

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

Table 4 – Project Names

#	Project Name
1	CDBG Planning and Development
2	Code Enforcement
3	Demolition
4	Parks & Recreation - Youth Program
5	Public Safety - Neighborhood
6	Community Homework's - Critical Home Repair
7	Senior Services - Home Repair for the Elderly
8	United Way of the Battle Creek and Kalamazoo Region - Continuum of Care - CDBG
9	Code Enforcement Repair Pilot Program
10	KNHS - Down Payment Assistance
11	Ministry with Community - Homeless Outreach
12	Neighborhood Enhancement – Target Neighborhoods
13	HOME Program Administration and Planning
14	New Horizon Rental Rehab Program
15	Kalamazoo Valley Habitat Homeownership Program
16	Affordable Housing Program
17	CV-General Administration
18	CV-Senior Services, Inc.
19	CV-Housing resources, Inc.
20	CV-Small Business Assistance
21	CV-The Lift Foundation-Knights Inn Acquisition
22	CV-Emergency Hotel Stays
23	CV-Subsistence Payments

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 2019-2023 Consolidated Plan. This outreach was evaluation 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 2019-2023 Consolidated Plan.

Obstacles to addressing underserved needs are due to the reduction of financial resources, which 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 is 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 a 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 that 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.

Table 3 – Project Summary

1	Project Name	CDBG Planning and Development
	Target Area	City-wide low-income households
	Goals Supported	Affordable Housing Homeless Assistance Neighborhood Enhancement Youth Development
	Needs Addressed	Administration of Programs
	Funding	CDBG: 323,765
	Description	The CP&D Department will utilize the 20% percent cap available from the entitlement funding for management, monitoring and coordination of Activities impacting low to moderate income residents. Funding also includes 85,404 in anticipated program income.
	Target Date of Completion	06/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	There is population of approximately 75,984 residing in the City of Kalamazoo of a non-low/mod and low-mod status will benefit from proposed activity.
	Location Description	415 Stockbridge Avenue Kalamazoo, MI 49001
	Planned Activities	Administration of the CDBG program for the 2019 program year to include monitoring, reporting technical assistance, etc.
2	Project Name	Code Enforcement
	Target Area	CDBG-Eligible Census Tracts
	Goals Supported	Affordable Housing
	Needs Addressed	Public Services
	Funding	CDBG: 400,000
	Description	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.
	Target Date	06/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	For 2019, the program anticipates that it will issue Housing Code violations affecting an estimated 1000-1300 homeowner and rental housing units to address, curb lawn trash, zoning violations, tall grass/weeds, and graffiti, and general blight.
	Location Description	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.
	Planned Activities	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 and general blight.

3	Project Name	Demolition
	Target Area	CDBG-Eligible Census Tracts
	Goals Supported	Neighborhood Enhancement
	Needs Addressed	Public Services
	Funding	CDBG: 100,000
	Description	Funding for the emergency demolition of imminently dangerous buildings and blight removal.
	Target Date	06/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	3 Buildings
	Location Description	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.
	Planned Activities	Will demolish three vacant, abandoned single-family residential structures.
4	Project Name	Parks & Recreation - Youth Development
	Target Area	CDBG-Eligible Census Tracts
	Goals Supported	Neighborhood Enhancement
	Needs Addressed	Public Services
	Funding	CDBG: \$36,855
	Description	Sponsor programs that are devoted to the mental well-being, discovery of self-worth and relationship development of children.
	Target Date	06/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The Parks and Recreation Department will provide an after school and summer youth program from the Youth Development Center located CDBG – Eligible Census Tract Edison Neighborhood. The Center draws from families primarily in the Eastside, Edison, and Vine neighborhoods which are CDBG-eligible. Approximately 68 percent of the households in these four neighborhoods have an income that is 80 percent or below the area median income. In addition, 72 percent of the students within the Kalamazoo Public School system in these neighborhoods are eligible for free and reduced lunch.
	Location Description	230 East Crosstown Parkway, Kalamazoo. Activity will serve census tracts 9, 16 and 13.
Planned Activities	The Youth Development Center provides services that include meeting space for youth and youth organizations; youth and staff training; programs; a resource center with information and equipment available for use by youth; and collaborative programming that includes intergenerational youth programs, leisure, social/educational and entrepreneurial programs.	
5	Project Name	Public Safety - Neighborhood
	Target Area	CDBG-Eligible Census Tracts
	Goals Supported	Neighborhood Enhancement

	Needs Addressed	Public Services
	Funding	CDBG: \$150,000
	Description	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.
	Target Date	06/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	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.
	Location Description	The activities will take place in one of following census tracts: 1.00, 2.01, 2.02, 3.00, 5.00, 6.00, 9.00, 10.00 and 11.00
	Planned Activities	<p>The role of the Community Policing 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>
6	Project Name	Community Homework's - Critical Home Repair
	Target Area	CDBG-Eligible Census Tracts
	Goals Supported	Affordable Housing
	Needs Addressed	Rehabilitation of Existing Units
	Funding	CDBG: \$150,000
	Description	Community Homework's will use CDBG funding to complete approximately 60 emergency home repairs and will rehabilitate three homes for low- to moderate-income homeowners.
	Target Date	06/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Sixty (60) low-income households will benefit from this proposed activity.
	Location Description	The activities will take place in one of following census tracts: 1.00, 2.01, 2.02, 3.00, 5.00, 6.00, 9.00, 10.00 and 11.00

	Planned Activities	Community Homework's with provide loans for minor/critical home repair and moderate housing rehabilitation
7	Project Name	Senior Services - Home Repair for the Elderly
	Target Area	CDBG-Eligible Census Tracts
	Goals Supported	Affordable Housing
	Needs Addressed	Rehabilitation of Existing Units
	Funding	CDBG: \$125,000
	Description	Senior Services, Inc. will use CDBG funds to perform minor home repairs and barrier-free accessibility enhancements to approximately 50 housing units owned by senior citizens in CDBG-eligible Census Tracts throughout the City of Kalamazoo
	Target Date	06/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Fifty (50) senior households will benefit from this proposed activity.
	Location Description	The activities will take place in one of following census tracts: 1.00, 2.01, 2.02, 3.00, 5.00, 6.00, 9.00, 10.00 and 11.00
	Planned Activities	Minor/critical home repair and ADA accessibility improvements
8	Project Name	United Way of Battle Creek and Kalamazoo Region - Continuum of Care – CDBG (reprogramed from LISC)
	Target Area	City-wide low-income households
	Goals Supported	Homeless Assistance
	Needs Addressed	Homeless Emergency Shelters Homeless Prevention
	Funding	CDBG: \$20,000
	Description	United Way of the Battle Creek and Kalamazoo Region 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. United Way of the Battle Creek and Kalamazoo Region will also provide staff for the Affordable Housing Partnership.
	Target Date	06/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Homeless families will benefit from this proposed activity.
	Location Description	City-wide
	Planned Activities	Administration of the Continuum of Care.
9	Project Name	Code Enforcement Repair Program
	Target Area	CDBG-Eligible Census Tracts

	Goals Supported	Neighborhood Enhancement
	Needs Addressed	Funding will assist families with repairs resulting in code violations
	Funding	CDBG: \$125,000
	Description	City of Kalamazoo will utilize \$125,000 in CDBG funds to address critical home repairs that result in code violations.
	Target Date	7/01/18
	Estimate the number and type of families that will benefit from the proposed activities	The City of Kalamazoo will use CDBG funds to assist approximately 25 families with home repairs who are financially stressed.
	Location Description	These activities will take place in one of following census tracts: 1.00, 2.01, 2.02, 3.00, 5.00, 6.00, 9.00, 10.00 and 11.00
	Planned Activities	Funding will be used to address infrastructure improvements as needed.
10	Project Name	KNHS – Down Payment Assistance Program
	Target Area	Eligible Census Tracts
	Goals Supported	Affordable Housing
	Needs Addressed	Home Purchase - Down Payment Assistance
	Funding	CDBG: 75,000
	Description	City of Kalamazoo will use CDBG funds to address the need for down payment assistance for ten (10) for low/mod families.
	Target Date	06/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	City of Kalamazoo will use CDBG funds to address the need for down payment assistance for ten (10) for low/mod families.
	Location Description	The activities will take place in one of following census tracts: 1.00, 2.01, 2.02, 3.00, 5.00, 6.00, 9.00, 10.00 and 11.00
	Planned Activities	City of Kalamazoo will use CDBG funds to assist ten (10) low/mod families with down payment assistance. This program offers down payment assistance to first-time homebuyers. Eligible homebuyers can qualify for funding to use toward down payment and/or closing costs on a one- to four- family home or purchased in one of the five neighborhoods. The amount of the assistance will be up to \$7500. Eligible borrowers must be first-time homebuyers with a maximum annual household income up to 80% of Area Median Income (AMI); purchase a one- to four-family home, , or cooperative in one of the five core neighborhoods of the City of Kalamazoo; qualify for a mortgage loan from a participating lender; have their own savings to contribute toward down payment and closing costs; successfully complete a homebuyer education course with a HUD-approved counseling agency; and occupy the property as their primary residence for at least ten years.
11	Project Name	Ministry with Community
	Target Area	Eligible Census Tracts

	Goals Supported	Homeless Prevention
	Needs Addressed	Homelessness
	Funding	CDBG: 30,000
	Description	City of Kalamazoo will use CDBG funds to address homeless prevention.
	Target Date	06/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 100 to 125 homeless individuals will benefit daily.
	Location Description	The activities will take place in one of following census tracts: 1.00, 2.01, 2.02, 3.00, 5.00, 6.00, 9.00, 10.00 and 11.00
	Planned Activities	City of Kalamazoo will use CDBG funds to assist Ministry with Community in the prevention of homelessness
	12	Project Name
Target Area		CDBG-Eligible Census Tracts
Goals Supported		Neighborhood Improvement
Needs Addressed		Addresses stabilization of neighborhoods by providing funding to address quality of life, façade improvement, infrastructure, and beautification projects in targeted neighborhoods.
Funding		HOME: 200,000
Description		City of Kalamazoo will use CDBG funds to address targeted neighborhood needs for low to moderate income communities.
Target Date		06/30/2020
Estimate the number and type of families that will benefit from the proposed activities		The City of Kalamazoo will use CDBG funds for targeted low/mod neighborhoods Estimated benefits = 7200
Location Description		The activities will take place in one to nine of following census tracts: 1.00, 2.01, 2.02, 3.00, 5.00, 6.00, 9.00, 10.00 and 11.00
Planned Activities	The City of Kalamazoo will use CDBG funds to address quality of life, façade improvement, infrastructure, and beautification projects in targeted neighborhoods. housing for low/mod income families.	
13	Project Name	HOME Program Administration and Planning
	Target Area	City-wide low-income households
	Goals Supported	Affordable Housing
	Needs Addressed	Administration of Programs
	Description	The CP&D Department will utilize the 10% cap available from the entitlement funding for management, monitoring and coordination of HOME Activities.

	Target Date	06/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	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.
	Location Description	These activities will take place in one of following census tracts: 1.00, 2.01, 2.02, 3.00, 5.00, 6.00, 9.00, 10.00 and 11.00
	Planned Activities	Administration of HOME Program.
14	Project Name	New Horizon Rental Rehab Program
	Target Area	HOME-Eligible Census Tracts
	Goals Supported	Affordable Housing
	Needs Addressed	Rehabilitation of Existing Rental Units
	Funding	HOME: \$118,000
	Description	City of Kalamazoo will use HOME funds to address the need for affordable Housing for low/mod families with disabilities.
	Target Date	06/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The City of Kalamazoo will use HOME funds to rehab/convert two apartments for handicap individuals. Any additional funding remaining will be used for the rehab/repair of additional units.
	Location Description	The activities will take place in one of the following census tracts: 1.00, 2.01, 2.02, 3.00, 5.00, 6.00, 9.00, 10.00 and 11.00
	Planned Activities	The City of Kalamazoo will use HOME funds to rehabilitate acquire and or construct affordable housing for low/mod income families.
15	Project Name	Habitat for Humanity Homeownership Program
	Target Area	HOME-Eligible Census Tracts
	Goals Supported	Affordable Housing
	Needs Addressed	Rehabilitation of Existing Homes
	Funding	HOME: 100,000
	Description	City of Kalamazoo will use HOME funds to address the need for two (2) affordable Housing for low/mod families.
	Target Date	06/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The City of Kalamazoo will use HOME funds to rehabilitate two (2) affordable housing for low/mod income families
	Location Description	The activities will take place in one of following census tracts: 1.00, 2.01, 2.02, 3.00, 5.00, 6.00, 9.00, 10.00 and 11.00

	Planned Activities	The City of Kalamazoo will use HOME funds to rehabilitate, acquisition n or construct affordable housing for low/mod income families.
16	Project Name	Affordable Housing Program
	Target Area	CDBG-Eligible Census Tracts
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable housing
	Funding	HOME: \$411,008
	Description	Affordable Housing Program will address the lack of affordable for low to moderate income families by rehabbing or constructing new units. The goal is to rehab or build affordable housing that will house low to moderate income families. .
	Target Date	06/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	For 2019, the program anticipates providing housing for a minimum of four low to moderate income families
	Location Description	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.
	Planned Activities	The City will work with developers to rehab or build four affordable housing units.
17	Project Name	CV-General Administration
	Target Area	City-wide
	Goals Supported	Affordable Housing, Homeless Assistance, Economic Development
	Needs Addressed	Rental Assistance, Public Services, Economic Development, Administration of Programs, COVID-19 Pandemic Response
	Funding	\$114,554.75
	Description	The function of this activity is to provide necessary staffing to develop, implement and monitor the overall performance of all CDBG-CV programs in the City.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	City-wide
	Planned Activities	The function of this activity is to provide necessary staffing to develop, implement and monitor the overall performance of all CDBG-CV programs in the City.
18	Project Name	CV-Senior Services, Inc.
	Target Area	City-wide
	Goals Supported	Public Services
	Needs Addressed	Affordable housing

19	Funding	CDBG: \$25,000
	Description	The purpose of the program is to aid in the form of meals for City of Kalamazoo senior residents for up to three months in response to the COVID-19 Pandemic
	Target Date	06/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	50 individuals
	Location Description	City-wide
	Planned Activities	Providing meals on wheels to quarantined senior individuals or senior individuals that need to maintain social distancing due to medical vulnerabilities.
	Project Name	CV-Housing Resources, Inc.,
	Target Area	City - Wide
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable housing
	Funding	CDBG-CV: \$719,053
	Description	Rental Assistance Program will assist qualified households that have been impacted by the COVID-19 pandemic.
	Target Date	06/30/2021
Estimate the number and type of families that will benefit from the proposed activities	100 households	
Location Description	City - wide	
Planned Activities	The City of Kalamazoo will partner with United Way of Battle Creek and Kalamazoo Region and Housing Resources, Inc., to provide rental assistance funding that will complement the City's "Eviction Diversion Program".	
20	Project Name	CV-Small Business Assistance
	Target Area	CDBG-Eligible Census Tracts
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG-CV: \$239,684.25
	Description	Promotion of Economic – Development activities to response to COVID-19 Pandemic
	Target Date	06/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	75 businesses

	Location Description	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.
	Planned Activities	The City will work with small businesses to purchase supplies and materials that will assist their business in re-opening to the public and maintain clean, social distance environments
21	Project Name	The Lift Foundation -Knights Inn Acquisition – COVID 19
	Target Area	City - Wide
	Goals Supported	Homeless Prevention
	Needs Addressed	Affordable housing
	Funding	CDBG-CV: \$0
	Description	Acquisition of the “Knights Inn” assist homeless families and individuals that have been impacted by the COVID-19 pandemic.
	Target Date	06/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City - wide
	Planned Activities	The City of Kalamazoo will partner with the Lift Foundation in the acquisition of the Knights Inn
21	Project Name	CV-Emergency Hotel Stays
	Target Area	City-wide
	Goals Supported	Homeless Assistance
	Needs Addressed	Public Services, COVID-19 Pandemic Response
	Funding	CDBG-CV: \$0
	Description	Focused on providing safe and accessible temporary housing for those needing to quarantine during COVID-19.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	0
	Location Description	City-wide
	Planned Activities	Focused on providing safe and accessible temporary housing for those needing to quarantine during COVID-19.
22	Project Name	CV-Subsistence Payments
	Target Area	City - Wide
	Goals Supported	Affordable Housing, Homeless Assistance

Needs Addressed	Rental Assistance, Public Services, COVID-19 Pandemic Response
Funding	CDBG-CV: \$343,227
Description	Will support low- and moderate-income families in maintaining safe, affordable housing by providing financial assistance for rent, security deposit, utilities, or other associated allowable costs.
Target Date	06/30/2023
Estimate the number and type of families that will benefit from the proposed activities	Estimated 70 households
Location Description	City - wide
Planned Activities	The City will partner with Housing Resources, Inc to support low- and moderate-income families in maintaining safe, affordable housing by providing financial assistance for rent, security deposit, utilities, or other associated allowable costs.

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 funds are intended to be used throughout the City.

Table 4 - Geographic Distribution

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

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 56% 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 (R/ECAPs).” 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 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 funding was not a part of the City of Kalamazoo allocation for 2019.

However, the City of Kalamazoo will use public services to fund ESG administrative efforts throughout the City of Kalamazoo. Many of the homeless shelters are located within downtown Kalamazoo or the core neighborhoods.

AP-55 Affordable Housing – 91.220(g)

Introduction

As housing costs continue to rise, the City will utilize CDBG/HOME funding to develop safe, decent, affordable housing for low- and moderate-income households. CDBG/HOME funds will primarily be utilized for the development of single-family housing for ownership, multi-family housing for rental, rehabilitation of existing units and down payment/closing costs assistance for first time homebuyers.

For PY2019, the following goals are expected:

Table 5 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households to be Supported	
Homeless	125
Non-Homeless – Direct Financial Assistance	10
Special-Needs	2
Total	137

Table 6 - One Year Goals for Affordable Housing by Support Type

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Repair of Existing Units	120
Acquisition of Existing Units	2
Total	122

Discussion

The table describes the one-year goals for the CDBG/HOME Program as required by 91.220(g). It describes the term affordable housing to be defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership. This table does not include the 10 homes that will be supported through Down Payment Assistance (DPA).

AP-60 Public Housing – 91.220(h)

Introduction

Kalamazoo does not have public housing.

Actions planned during the next year to address the needs to public housing.

N/A

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

N/A

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

assistance.

N/A

Discussion

N/A

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

Introduction

The City of Kalamazoo continues to invest future federal funds to projects providing benefits to very low- and low-income persons who are homeless or have special needs. During the public outreach process, the city reconfirmed that homelessness is a major issue the community faces. For this reason, the city will allocate federal funds to the Continuum of Care and will give priority to affordable housing projects that provide housing units to homeless persons.

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

The goals and actions for reducing and ending homelessness including reach out to homeless persons and assessing their individual needs are as follow:

Housing Resources, Inc. and Goodwill Industries sponsor a weekly Community Housing Information Hour.

Participating organizations include but are not limited to the Department of Health and Human Services, and Kalamazoo Community Mental Health. The services include coordinated entry screening for households experiencing homelessness or at risk of experiencing homelessness, information and referral, and screening and assessment.

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.

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

To support outreach efforts to homeless persons, City of Kalamazoo staff and citizens are encouraged to participate in the annual point-in-time (PIT) count. Staff and residents have participated in the count in previous years.

Addressing the emergency shelter and transitional housing needs of homeless persons

Gryphon Place 2-1-1 provides 24 hour information and referral services to residents in need of help to Kalamazoo continuum of care organizations. These individuals are then presented through a Community Housing Matching Process

(CHaMP) within 5 business days and matched with available housing resources that best meets their needs and prioritizes our community's most vulnerable citizens.

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 will continue to provide ESG funds through the Kalamazoo County Continuum of Care to support emergency shelter and transitional housing needs upon funding. Exact outcomes will not be known until an allocation is made from HUD.

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

Moving towards prevention, the Continuum of Care is currently utilizing over 1,100 vouchers to help in the fight to alleviate homelessness in the City of Kalamazoo. The Housing Assistance and Resource Agency (HRI) was given an increase in funding this year from MSHDA ESG monies to help more individuals stay in their housing to bring down the amount of people evicted or foreclosed upon in 2019.

The Continuum of Care funded agencies have also worked diligently in developing a standardized process of entry along the “no wrong door” premise. The new system will consolidate paperwork and essentially create a centralized bureaucracy that will eliminate confusion and remove multiple barriers to entry for those seeking housing in the City of Kalamazoo.

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.

The Kalamazoo County Multi-Purpose Collaborative Body passed a resolution to work cooperatively with the Kalamazoo Continuum of Care to ensure a discharge policy for persons leaving publicly funded institutions or systems of care.

There are strong "guidelines" about discharge from the State hospitals and from the mental health unit at Borgess Hospital. Kalamazoo Community Mental Health and Substance Abuse Services employ hospital liaisons to work with individuals prior to release to create a "person centered plan" which includes next steps after discharge. Kalamazoo Community Mental Health and Substance Abuse Services also funds a jail liaison position to connect people in jail with appropriate mainstream, Medicaid funded mental health services.

The Continuum of Care Planning Policy regarding discharge follows:

Foster Care: Local foster care providers are required to adhere to Michigan's laws, policies, and procedures applicable to adult and child foster care placement and discharge. Young adults (ages 18-21) transitioning out of foster care to independent living are assisted in finding suitable and sustainable living arrangements. They may be provided first month's rent, security/utility deposit, and monies to purchase household goods, food, and supplies. Discharge is guided by a needs assessment and the information collected in a Individual Service Plan.

Health Care: Discharge planning assessment, planning, and follow-up procedures are managed by providing a multi-disciplinary team approach to patients with post-hospital needs. Discharge Planning is the vehicle which moves the patient to the proper level of post-hospital care and/or to the proper facility

The regional Veteran's Administration (VA) serves 14,000 veterans per year, half of whom are from the local area. The hospital 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.

Mental Health: The Kalamazoo County Mental Health and Substance Abuse Services agency follows the dictates of Section 330.1209b of the Mental Health Code, which states that "the community mental health services program will produce in writing a plan for community placement and aftercare services that is sufficient to meet the needs of the individual."

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.

The rental assistance through Housing Resources, Inc. and Catholic Family Services may support individuals leaving an institutional setting. In addition, the ESG funds that will be allocated through the Continuum of Care will assist with

rapid re-housing and homeless prevention.

Discussion

In addition, Kalamazoo county conducts a 24-hour count of those who are experiencing homelessness in our community annually. The Point-in-Time Count is intended to provide a snapshot of Kalamazoo Count’s homeless population. It is one way to collectively understand the scope and breadth of homelessness in our community. The count is an important effort that ensures the voices of people experiencing homelessness are heard and efforts are made to provide appropriate services. It also helps communities develop more effective plans and measure progress toward ending homelessness.

One year goals for the number of households to be provided housing through the use of HOPWA for:
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 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

Recognizing that Zoning can serve as a barrier to housing options and affordability, the City of Kalamazoo is undertaking a Zoning Code rewrite and an update to the Zoning Map. These changes are designed to increase the quantity and location of housing types throughout the City.

The City’s existing Zoning Ordinance 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.

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.

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.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

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 City of Kalamazoo's code enforcement and anti-blight effort is funded with CDBG. One of the enforcement teams' main purposes is the identification and resolution of blighted housing units, which can be made available for low-income households, thereby increasing the number of affordable housing units in the City.

The City of Kalamazoo has also provided CDBG funding to the Local Initiatives Support Corporation for capacity building and technical assistance of housing, Community Housing Development Organizations and/or neighborhood-based nonprofit organizations operating within Kalamazoo. The capacity and productivity of these organizations are important elements in addressing current barriers to the provision of affordable housing.

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 over the five-year period of the Consolidated Plan are:

- Focus CDBG funding on substandard housing and/or deferred maintenance of affordable housing units, particularly in the Eastside, Edison and Northside Neighborhoods.
- Pilot a housing repair program for low-income homeowners that receive code violations.
- Lead Hazard Removal. The City of Kalamazoo has been awarded a Lead Based Hazard Reduction grant. Purpose is to identify, and control lead based hazards. Focus is on homes with children under six year of age.

Discussion

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 PY2019 are:

- Community Homeworks
- Senior Services, Inc.
- New Horizons
- Kalamazoo Valley Habitat for Humanity
- Kalamazoo Neighborhood Housing Services

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.

The City of Kalamazoo will continue to support development for PY2019 as follow:

- 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 recognizes that the needs of Kalamazoo residents extend beyond housing and infrastructure. These needs include reducing lead-based paint hazards, reducing poverty, developing institutional structures, and enhancing coordination between public and private social service agencies. The following is a list of actions that the City of Kalamazoo intends to implement over the next fiscal year to achieve success in addressing the housing and community development needs of low to moderate income residents.

Actions planned to address obstacles to meeting underserved needs.

The City recognizes the significance of taking actions to address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead-based paint hazards, reduce the number of poverty-level families and enhance the coordination between public and private housing and social service agencies. The paragraphs below address the actions being undertaken by the City.

Actions planned to foster and maintain affordable housing.

In PY2019, the City will continue to place an emphasis on affordable housing as part of the competitive grant application process. A total of five nonprofit organizations will receive CDBG and HOME funding to expand new and

maintain existing affordable housing. Approximately **\$568,000** (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.

Lead based hazards in the City of Kalamazoo remain a significant concern in light of the City's desire to rehabilitate older housing stock to maintain affordable housing. According to the U.S. Census, 89 percent of the owner-occupied and 74 percent of renter-occupied housing in the City was built prior to 1980, and of which, 26 percent of owner-occupied and 12 percent of renter-occupied have children present.

The City of Kalamazoo has been awarded a Lead Based 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 2019 – 2023.
- 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.

The City also continues to include lead hazard reduction strategies into 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."

Two single-family homes will be completely rehabbed with PY2019 funds. The removal of lead-based paint, if found, will be a requirement of these rehabilitations. In addition, the City plans to utilize **\$100,000 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 three structures will reduce the chances of a household living with lead contamination.

Actions planned to reduce the number of poverty-level families.

For PY2019, 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.

Approximately one third of the City lives below the federal poverty. That number increases beyond 50% in several of the core neighborhoods that also have the highest concentration of people of color. The City of Kalamazoo has initiated Shared Prosperity Kalamazoo (SPK) to address poverty. SPK is a bold and ambitious plan to transform our community into a place where every child and every adult thrives and prospers. In 2014, the City Commission voted to make the reduction of poverty, especially among children one of its top priorities. This Commission priority was substantiated by the community through the Imagine Kalamazoo 2025 engagement process and the resulting Strategic

Vision and Master Plan. More than 3,500 community voices gave input on the opportunities and challenges the City faced. As a result of those voices the following goals were laid out in the Strategic Vision – Shared Prosperity, Connected City, Inviting Public Spaces, Environmental Responsibility, Safe Community, Youth Development, Complete Neighborhoods, Strength through Diversity, Economic Vitality and Good Governance. Shared Prosperity aligns most closely with the Strategic Goals of Shared Prosperity, Complete Neighborhoods, Youth Development, Strength through Diversity and Economic Vitality.

SPK is guided by a coalition made of an Organizing Committee and goal teams. The Organizing Committee is responsible for convening stakeholders for conversations and accountability around recommendations to meet the goals set forth in the plan. There are three teams each one focusing on a specific SPK goal. The members of the teams include both service providers and residents. They teams are intended to meet 4-6 times a year to share information, actions/programs to be presented to the Organizing Committee. SPK budget, plans and initiatives will have final approval by the City Commission before implementation.

SPK has three goals that work is being planned and implemented on simultaneously. They are; 1) Promote the health growth, development and learning of children 2) Increase access to good jobs; and 3) Promote strong families. SPK also has four targeted populations. They are; 1) Families of color 2) Families at or below poverty level and those not earning a living wage; 3) Families in neighborhoods of concentrated poverty and 4) Individuals with criminal records.

The combination of aspirational goals and community engagement has led SPK to focus on three particular neighborhoods that encompass five census tracts within the city—Eastside, Edison, and Northside—for targeted action projects.

The goals for this Affordable Housing Plan and SPK are closely aligned. Both plans address the following:

- Low to mod income residents
- Low to mod income and racially concentrated areas of the City/Census tracts
- Housing/Found in the Strong Families goal in SPK
- Youth development

The City of Kalamazoo is integrating HUD funding with private funding to address these shared goals.

In addition, the City has an approved Section 3 Preference Policy support local low-income businesses and residents, improving their financial stability.

The city will also provide loans to for profit organization willing to partner with the City to address Affordable Housing.

Actions planned to develop institutional structure.

The City of Kalamazoo has strengthened relationships in the past few years with local funders and nonprofit organizations. A more coordinated effort to project implementation is a priority discussed among the major stakeholders in the community. To that end, the Program Officers Network of Kalamazoo was organized. The Director of Community Planning and Economic Development will attend their meetings during the 2019 program year. The goal

is to allow foundations like Kalamazoo Community Foundation, the Gilmore Foundation and Arcus Foundation to work together towards improving grant coordination and the local distribution of grant funds.

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 host bi-monthly meetings with the core CDBG-eligible neighborhoods during PY2019. 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 PY2019 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 priority needs to 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 Southcentral Michigan Community Action Agency. Community Planning and Economic 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. 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.

The Continuum of Care Director has also empowered the Allocations and Accountability Team to be a much more vocal and essential team to the health and sanctity of the operation of the Continuum. This will come with voting members being able to directly inquire to the leadership of the funded agencies about operations and performance and then holding the agencies accountable for their actions. This is also the impartial team that decides how Continuum of Care funding received from HUD will be allocated to the funded agencies or any others applying for funding.

Discussion

As the City continues to develop public policy to address these needs, it will keep close communication with internal and external stakeholders, participate in conferences and staff development, and provide assistance to assure coordination among private and governmental health, mental health and service agencies.

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.

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	\$120,680
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	\$120,688

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.	76%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(l)(2)

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

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.

- **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.

- **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.

- **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

DRAFT

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

1. **Include written standards for providing ESG assistance provided the City is funding at a later time during the year.**

HUD did not allocate funding for this program for PY2019. However, \$20,000 (CDBG) is to be awarded to CoC for administrative support and 30,000 to Ministries with Communities for homeless assistance.

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 as available will be awarded 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.

2. 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 24-hour information and referral services to residents in need of help to Kalamazoo continuum of care organizations. These individuals are then presented through a Community Housing Matching Process (CHaMP) within 5 business days and matched with available housing resources that best meets their needs and prioritizes our community's most vulnerable citizens.*

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.

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).

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. For PY2019 the City of Kalamazoo did not receive funding for ESG. However, the City provided fund Local Initiatives Support Corporation in the amount of 20,000 through its CDBG allocation.

5. Describe performance standards for evaluating ESG.

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.

Discussion

For program year 2019 the Department of Housing and Urban Development did not fund Emergency Solutions Grant (ESG).