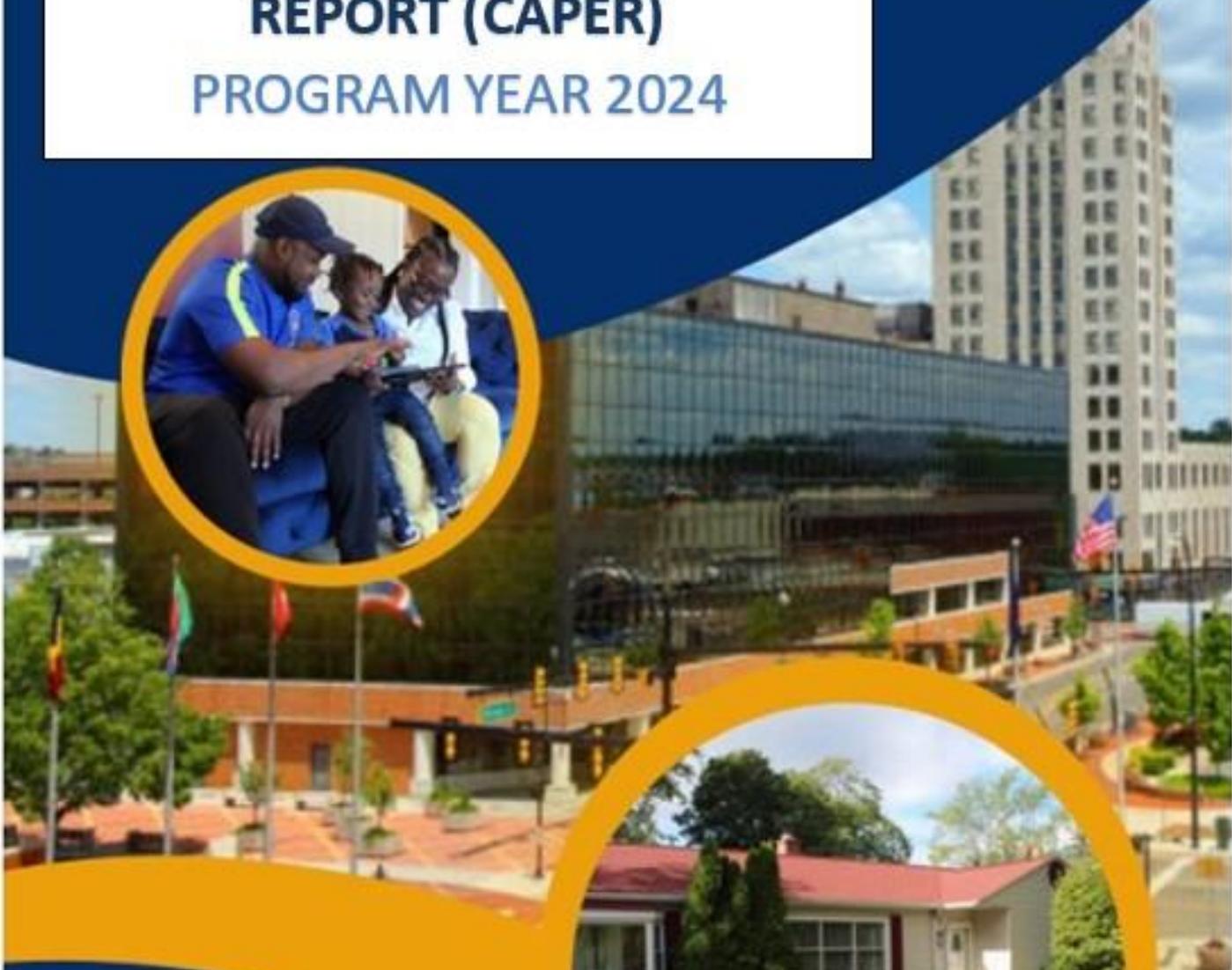


CITY OF BATTLE CREEK

CONSOLIDATED ANNUAL PERFORMANCE EVALUATION REPORT (CAPER) PROGRAM YEAR 2024



269-966-3315



10 N Division St, Battle Creek, MI
49014



<https://battlecreekmi.gov/181/Community-Development>

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.

91.520(a)

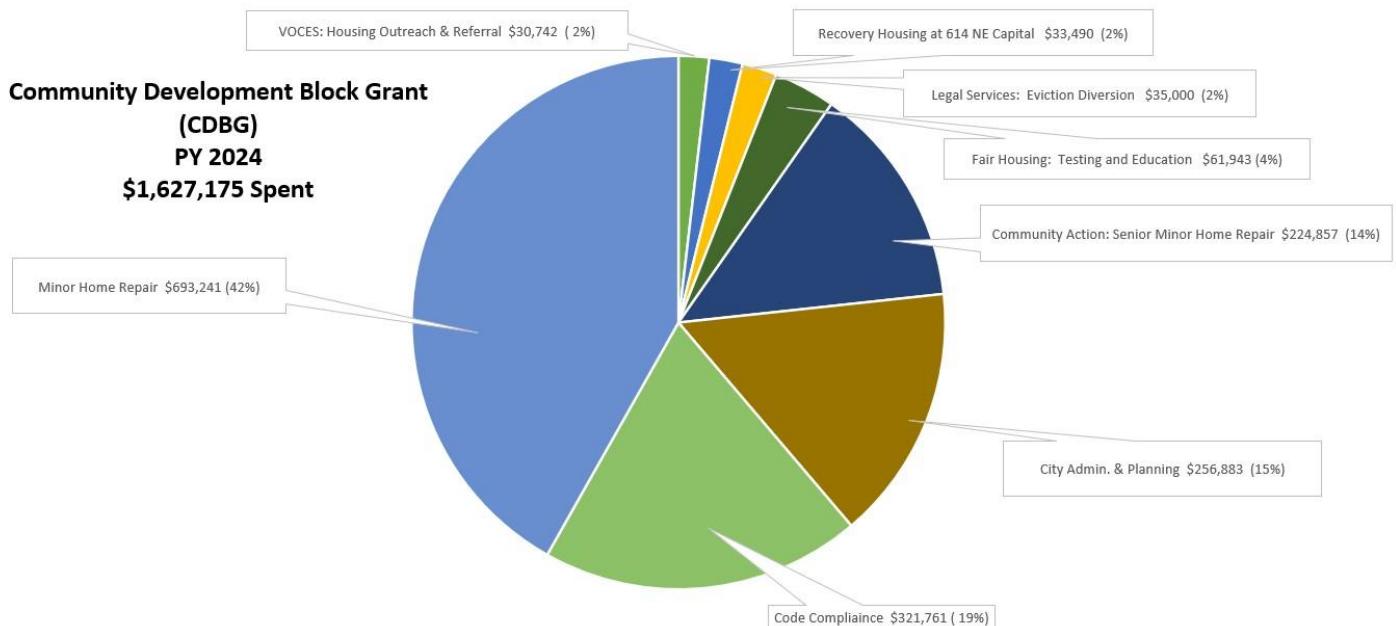
This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The City of Battle Creek, through its Community Development Division, is the entitlement grant administrator of formula allocations from the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) programs. Each year the U.S. Department of Housing and Urban Development (HUD) requires the submission of an annual report, the Consolidated Annual Performance Evaluation Report (CAPER) which meets the reporting requirements in Section 104(e) of the Housing and Community Development Act of 1974, as amended, and 24 CFR Part 91 regarding the Consolidated Planning requirements.

Community Development manages the federal **Community Development Block Grant (CDBG)** and **HOME Investment Partnership (HOME)** programs for the **City of Battle Creek**, as well as **Lead Hazard Remediation Programs**, the **Battle Creek Public Schools Housing Incentive Program** and provides support to the City's **Neighborhood Planning Councils**.

The CAPER provides information on the outcomes of projects and activities described in the City's 2024 Annual Action Plan for community development initiatives accomplished during the period of July 1, 2024 through June 30, 2025. This is the City of Battle Creek's fifth annual performance report for the 2020-2024 Consolidated Plan.

In Program Year (PY) 2024, from July 1, 2024 through June 30, 2025, the City received CDBG funds of \$1,228,110 and HOME Investment Partnership funds of \$267,571.52. Using current year funds and



unspent funds from previous years, in Program Year 2024, the City spent \$1,627,175 in CDBG funds in eight programs, including \$256,883 for Administration and Planning. The City administered CDBG-funded Minor Home Repair program assisted 40 households with health and safety repairs including roofs and furnaces spending a total of \$693,241 during the program year. In addition through a subrecipient agreement, Community Action assisted an additional 18 households with \$224,857 of funding remaining from PY 2023. The City spent \$321,761 on funding Code Compliance in target areas in low and moderate-income areas of the City. The City spent \$35,000 supporting Legal Services through an eviction diversion program and \$30,742 supporting VOCES with interpretation and housing advocacy services to the Latino community.

The City is also completing a rehabilitation of a vacant building into recovery housing for households recovering from opioid addiction at 614 NE Capital. In July 2024, the City of Battle Creek paid back \$128,266.47 to its line of credit, for a rental rehabilitation project at 614 NE Capital where the private developer failed to make progress on completing units of affordable housing, failing to deliver national objectives for the CDBG program. The City used Opioid Settlement funds to pay the line of credit back. The city took over ownership of the property from the developer and is now rehabbing the five unit apartment building to create recovery for persons recovering from opioid addiction. A competitive requests for proposals system was utilized to select a provider of recovery services to operate the facility after the rehabilitation is complete.

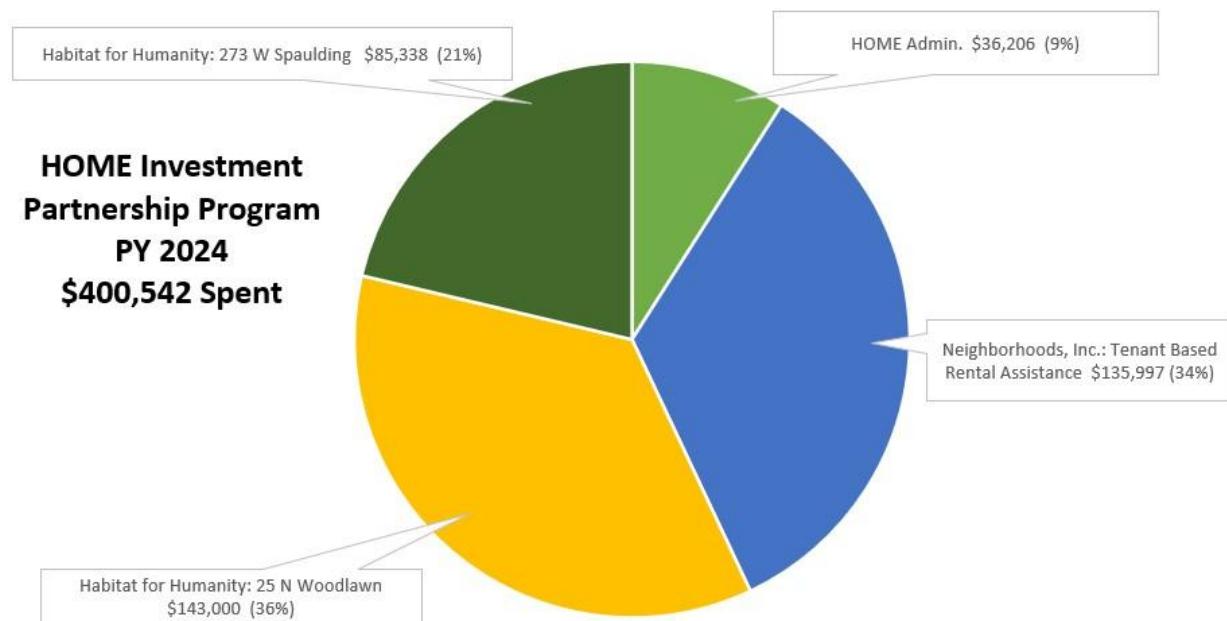
The City also funded the Fair Housing Center of Southwest Michigan to test the rental and real estate markets in Battle Creek and to conduct fair housing education.

The CDBG program has reserved \$490,000 in funding for New Level Sports through its Youth Village vision to construct a childcare facility to serve the Washington Heights community, this project has been delayed because of environmental concerns with the soil on the project. The environmental concerns are almost resolved with an approved Response Action Plan approved by the Michigan Department of Environment, Great Lakes and Energy (EGLE). The project is expected to move forward with a Finding Of Significant Impact in November of 2025.

Community Development Block Grant Funding (CDBG)	Spent in PY 2024	Committed to Projects	Remaining Funds in PY 2025
Minor Home Repair	\$ 693,241	\$ 693,241	\$ -
Code Compliance	\$ 321,761	\$ 392,217	\$ 70,456
City Admin. & Planning	\$ 256,883	\$ 256,883	\$ -
Community Action: Senior Minor Home Repair	\$ 224,857	\$ 300,000	\$ 75,143
Fair Housing: Testing and Education	\$ 61,943	\$ 75,000	\$ 13,057
Legal Services: Eviction Diversion	\$ 35,000	\$ 35,000	\$ -
Recovery Housing at 614 NE Capital	\$ 33,490	\$ 323,602	\$ 290,112
VOCES: Housing Outreach & Referral	\$ 30,742	\$ 35,000	\$ 4,258
Child Care Center at New Level Sports	\$ -	\$ 490,000	\$ 490,000
Total Spent CDBG funds in PY2024	\$ 1,657,918	\$ 2,600,944	\$ 943,025.66

HOME Investment Partnership Funds	Spent in PY 2024	Committed to Projects	Remaining Funds in PY 2025
Habitat for Humanity: 25 N Woodlawn	\$ 143,000	\$ 143,000.00	\$ -
Neighborhoods, Inc.: Tenant Based Rental Assistance	\$ 135,997	\$ 235,810.00	\$ 99,812.79
Habitat for Humanity: 273 W Spaulding	\$ 85,338	\$ 143,000.00	\$ 57,662.00
HOME Admin.	\$ 36,206	\$ 36,206.49	\$ -
In-Fill Housing	\$ -	\$ 489,357.00	\$ 489,357.00
Down Payment Assistance	\$ -	\$ 200,000.00	\$ 200,000.00
Total Spent HOME funds in PY2024	\$ 400,541.70	\$ 1,247,373.49	\$ 846,831.79

In HOME Investment Partnership Program, the City spent \$400,542 utilizing unspent funds from previous years HOME funding in addition to the \$267,571.52 in PY2024 allocation of HOME funding. HOME funding was expended through four activities, a Tenant-Based Rental Assistance administered by a subrecipient, Neighborhoods, Inc.; HOME Administration; and the new construction of two single family homes by the Battle Creek Area Habitat for Humanity with Habitat acting as a developer and Community Housing Development Organization (CHDO). The Tenant-Based Rental Assistance program assisted 37 households with short-term rental assistance and help with security deposits. The TBRA written agreement has additional funding to spend in the next program year, and the city will be providing additional years of funding.



The City continued to administer the additional resources allocated to address needs arising from the pandemic, including HOME-ARP funds. In late 2021, the City has received a federal award of HOME-American Rescue Act Program (ARP) funds for \$1,095,587. In PY2024, the City spent \$190,614 of its HOME-ARP award through subrecipients, with a remaining amount of \$469,874.71.

City of Battle Creek 2021 HOME-American Rescue Act (ARP) Formula Funding (December 2021-June 2025)		
Projects/Activities/Accomplishments	Amount Funded	Amount Remaining
Haven Life Recovery Programs - Supportive Services, 227 households assisted	\$ 252,000.00	\$ - Complete by June 30, 2024
HOME-ARP City Administration & Planning (15%)	\$ 164,338.05	\$ 73,613.07
Neighborhoods Inc of Battle Creek - Supportive Services, 596 households assisted	\$ 147,000.00	\$ 6,749.45
Drop-In, Self Help dba The SHARE Center - Outreach/Transportation/Supportive Services, 108 households	\$ 111,090.00	\$ 20,353.24
Gracious Homes - Supportive Services, 14 households assisted	\$ 52,000.00	\$ - Complete by June 30, 2024
Upholdings Permanent Supportive Housing Gap Financing (Awarded - No written agreement yet)	\$ 369,158.95	\$ 369,158.95
Battle Creek Community Foundation, Battle Creek Shelter (Canceled, May 2024)	Canceled	
TOTAL HOME-ARP HUD FUNDING	\$ 1,095,587.00	\$ 469,874.71 Amount Remaining

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Table 1 - Accomplishments – Program Year & Strategic 2020-2024 Consolidated Plan to Date

Goal	Indicator	Unit of Measure	Expected Consolidated Plan	Actual Strategic Plan	Percent Complete	Expected Program Year	Actual Program Year	Percent Complete
Attainable, Affordable Housing	Rental units rehabilitated	Household Housing Unit	12	3	25.00%	0	0	
Attainable, Affordable Housing	Homeowner Housing Added	Household Housing Unit	4	2	50.00%	2	1	0.00%
Attainable, Affordable Housing	Homeowner Housing Rehabilitated/Minor Home Repair Program	Household Housing Unit	217	217	100.00%	45	58	193.33%
Attainable, Affordable Housing	HOME-funded Direct Financial Assistance to Homebuyers	Households Assisted	50	0	0.00%	5	0	0.00%
Attainable, Affordable Housing	HOME-funded Tenant-based rental assistance / Rapid Rehousing	Households Assisted	90	155	172.22%	30	37	96.67%
Facility Improvements; Non-housing Community Development/New Level Sport Child Care Facility (stalled because of environmental concerns)	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	800	0	0.00%	0	0	0.00%
Housing Code Enforcement	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	1,0000	13,024	130.24%	2,000	5,064	253.20%
Public Service Grants	Public service activities other than Low/Moderate income Housing Benefit/VOCES Housing Outreach & Referral	Persons Assisted	2,605	832	31.94%			
Public Service Grants	Homelessness Prevention/Eviction Diversion	Persons Assisted	0	29		320	29	9.06%

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.

The goal of the City's Five Year Consolidated Plan is to ensure safe, prosperous, and equitable communities by creating strong, sustainable, and inclusive neighborhoods and quality affordable homes for all people of Battle Creek.

In order to achieve this goal, the plan has six strategic priorities. The accomplishments of the City and its partners from the 2024 program year highlight the progress being made to address these priorities:

Local Priority 1: Ensure Housing is Affordable, Accessible, and Safe

Communities are stronger when people have access to quality, affordable and safe housing. This priority encompasses preserving current affordable housing, development of new units, increasing the diversity of housing options, ensuring that low and moderate income neighborhoods benefit from housing resources, and ensuring that rental housing is safe.

- The City's Minor Home Repair program completed 40 projects for low and moderate income home owners, and Community Action's Senior Minor Home Repair assisted and additional 18 households.
- The City's CHIP Medicaid-funded Lead Safe Program completed full lead abatement of 24 residential units, and the HUD Lead Safe Program funded 22 additional abatements.
- Overall, Code Compliance took 5,064 actions to inspect or work with property owners.
- Code Compliance completed 814 rental property registrations within CDBG target areas.
- Code Compliance conducted 3,973 property surveys in target neighborhoods.
- Code Compliance cited 166 housing code violations.

Local Priority 2: Activate Underutilized Land in Low Income Neighborhoods

Local Priority 2: Activate Underutilized Land in Low-Income Neighborhoods The City will encourage the activation of public, vacant and/or underutilized land in low income areas, consistent with the City's master plan. Activation of these spaces enables communities to preserve natural resources for public use; promote higher densities and a wider range of land uses around downtown and major corridors; assemble property for larger scale developments and improve connectivity between neighborhoods and the downtown.

The Calhoun County Land Bank Authority (CCLBA) continued to be engaged in Post/Franklin (NPC1) and Washington Heights (NPC2) neighborhoods and attended meetings with discussion of the land reuse strategy of vacant properties in these areas. The CCLBA has continued and progressed work in the Northcentral (NPC 2) area also known as the Washington Heights Neighborhood with their Advisory

Committee (AC). The AC worked diligently in 2023 and 2024 to decide the disposition of 167 or 257 properties that are owned the CCLBA. The end use of the properties activated land for development, side lots to adjacent owners, beautification, and other uses of the properties in the community.

The Youth Village Child Learning Center, the project plan is to activate underutilized land in the Washington Heights area, a historic and low- to moderate-income neighborhood. Establishing a childcare center can have a positive impact on the community, as it provides essential services to local families while also serving as a catalyst for future development in the surrounding city block. An Environmental Assessments is currently being completed by an environmental services consultant. Completing the Environmental Assessment is crucial to evaluate the potential environmental impacts of the project and ensure compliance with local regulations. The project received approval from EAGL to move forward with an approved soil mitigation plan called a Response Action Plan.

Since the project aims to benefit the low- to moderate-income population, staff of the Youth Village Learning Center will provide quarterly activity and progress reports to the City of Battle Creek for five years. The long-term vision is that the childcare center will act as a launching point for further development in the area, providing amenities to the local low- to moderate-income population that lives in the Washington Heights neighborhood.

Local Priority 3: Alleviate Poverty

Individuals and families can be said to be in poverty if they have resources far below those of an average individual or family and the impact is that they are essentially excluded from ordinary patterns, customs, activities, or quality of life. This priority encompasses strategies that raise income, reduce the impact of being low income, and break up concentrated poverty. Legal Services provide eviction diversion program served 95 households helping to prevent homelessness. VOCES provided housing advocacy and interpretation services to 81 Hispanic and Latino families to help them access resources.

The City of Battle Creek has established a robust and collaborative partnership with Neighborhoods Inc. of Battle Creek, which serves as the Housing Assistance and Resource Agency (HARA) for Calhoun County as designated by the Michigan State Housing Development Authority. Neighborhoods, Inc. administers a HOME-funded Tenant-Based Rental Assistance Program (TBRA). That served 37 households in PY2024.

In the PY2025, the City will be issuing a Request for Proposals for a subrecipient to administer \$200,000 of the down payment assistance (DPA) program funded by the HOME program. This program is designed to extend financial aid to qualified homebuyers, facilitating their ability to cover down payment and closing costs, thereby enhancing affordability and accessibility to homeownership. This program would be combined with homeownership counseling to prospective homeowners.

Local Priority 4: Community Engagement through Collaboration and Empowerment

This priority promotes engagement and empowerment at all levels to the community. Empowerment refers to the process by which people gain control over the factors and decisions that shape their lives. To that end, this priority emphasizes projects that promote ownership, create or clarify pathways for community members to access and utilize resources; and/or that engage them in community decision-making processes. Other objectives in this priority promote organizing at the institutional and organizational level to create a sense of shared purpose, increase capacity, coordinate planning, partner across sectors, and build coalitions. City staff serve on the Housing Solutions Board, the decision-making and planning body for the Calhoun County Continuum of Care and the Homeless Coalition. Community Development also provides support for the seven active Neighborhood Planning Councils.

Local Priority 5: Affirmatively Further Fair Housing

Fair housing is the right to choose housing free from unlawful discrimination. Federal, state, and local fair housing laws protect people from discrimination in housing transactions such as rentals, sales, lending, and insurance. When accepting grant funds from HUD, the City agrees to use the funds affirmatively to further fair housing.

Local Priority 6: Restore Vitality in Low Income Neighborhoods

Vibrant and strong neighborhoods make a strong city. They possess a sense of place and a feeling of safety and familiarity. Houses are occupied and well maintained and public spaces are inviting, walkable, and lively. Strategies and projects that successfully address this priority create, facilitate, ensure, or enhance these conditions. Code compliance completed 5,064 code actions in CDBG target areas to address health and safety issues. The Calhoun County Land Bank Authority (CCLBA) concentrated work in the Northcentral (NPC 2) area with W.K. Kellogg Foundation funding continues to be driven by the community engagement of the Washington Heights Neighborhood Advisory Committee. CCLBA staff with this 14-member group of residents, property, and business owners, elected officials, and community leaders has had success in providing a platform for citizens to engage in the use of the property that is vacant in their neighborhood. In addition, with funding from WKKF, the CCLBA is now able to provide clear title on properties being sold through its Side Lot Program and help owners combine the new lot with their existing home so long as there are no other barriers like an existing mortgage. The pilot program provides the new owner with a clear title, and when possible, a combined property resulting in a better asset and investment. CCLBA also made investments in a handful of houses in its portfolio to return them to productivity. Repairs include adding roofs, stabilizing foundations, and addressing site clearance needs. In addition, staff is working with partners to build support around the construction industry, this is mainly being accomplished by monthly breakfasts that feature guest speakers and networking.

CR-10 - Racial and Ethnic composition of families assisted

**Describe the families assisted (including the racial and ethnic status of families assisted).
91.520(a)**

	CDBG	HOME
White	144	22
Black or African American	88	16
Asian	1	0
American Indian or American Native	1	0
Native Hawaiian or Other Pacific Islander	0	0
Total	234	38
Hispanic	97	0
Not Hispanic	137	38

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

Narrative

The numbers represent outcomes from the CDBG and HOME programs. The number of persons served includes persons that benefitted from the following programs: minor home repair programs run by the City and Community Action, eviction diversion services, housing case management, and tenant-based rental assistance and the homebuyer of 25 N Woodlawn.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	\$1,228,110.00	\$1,657,918.00
HOME	public - federal	\$267,571.52	\$400,541.70

Table 3 - Resources Made Available

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Airport Revitalization Area	10	16	See Below
Central Revitalization Area	15	27	
North Central Revitalization Area	30	21	This amount is lower than in previous years.
Post/Franklin Revitalization Area	20	14	See Below
Urbandale Revitalization Area	15	14	About expected amount of services was provided.

Table 4 – Identify the geographic distribution and location of investments

Narrative

The table above identifies the geographical distribution and location of investments. The most CDBG resources were spent in the Wilson/Coburn Neighborhood Planning Council 3 area, this revitalization area is an area of concentrated poverty and distressed areas. The Trinity Neighborhood Center is located in a closed Methodist church, this community center is managing a food pantry and applying for housing resource to lead a revitalization effort. The revitalization area with the second highest amount of Minor Home Repair investment was the Northcentral or Washington Heights area, this is the area of the City that is historically home to the City's largest African American population. The City along with the Calhoun County Land Bank has been focusing resources on in the Northcentral Revitalization and Post/Franklin areas to strengthen housing values and fund in-fill housing. New Level Sports Ministries and the Washington United Methodist Church has been leading redevelopment efforts in the Northcentral, Washington Heights area. Habitat for Humanity is building five new homes in the LaMora Park area of the Urbandale Revitalization area, this is where the new build at 25 N Woodlawn happened. A second house built by the Battle Creek Area Habitat for Humanity will be completed in PY2025 for homeownership at 273 W. Spaulding.

Minor Home Repair services are provided City wide on a first come, first served basis, all recipients provide income documentation. All five areas are geographies served by Neighborhood Planning Councils.

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.

A great deal of money was used in this community that was not HUD money. This includes dollars received by the Battle Creek Housing Commission, Neighborhoods Inc., and Community Action.

- Community Action Agency completed minor home repair projects for seniors totaling \$327,643 for seniors. The program is funded by the Calhoun County Senior Millage.
- Senior Millage assisted 6,348 older adults, age 60 and over, in the 2024 fiscal year spending \$3,371,692 through 21 different programs.
- Neighborhoods Inc. of Battle Creek provided housing assistance through MI-HOPE (\$495,000) and MICH (\$275,000), both funded by MSHDA.
- The HUD Continuum of Care funds awarded \$558,435 to eight different programs.
- The MSHDA Balance of State Emergency Shelter Grant award was \$167,513 split between Neighborhoods, Inc. as the HARA, and the Haven Emergency Shelters.
- The Citys Lead Safe Program completed 24 full lead abatement projects. The program is funded through a \$1.5 million grant from the Michigan Department of Health and Human Services.
- The City of Battle Creek is also working with a developer of permanent supportive housing, Upholdings, to develop 55 units of permanent supportive housing on five vacant parcels of land that the City currently owns. Two additional parcels would be included in the development, one currently owned by the Calhoun County Land Bank and one donated by the Battle Creek Community Foundation. Low income housing tax credits (LIHTC) would pay for the construction and housing choice vouchers from the Battle Creek Housing Commission would contribute to the operating costs of the permanent supportive housing development.

Because of being in an area with a high poverty rate, HOME match has been waived for the City of Battle Creek for the past four years.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	\$268,848
2. Match contributed during current Federal fiscal year	\$32,055
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$300,903
4. Match liability for current Federal fiscal year	0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$300,903

Table 5 – Fiscal Year Summary - HOME Match Report

Match provided is the value of Habitat for Humanity volunteers who worked on the two home builds during the program year. The volunteer hours are valued at \$10 per hour for working on 25 N. Woodlawn and 273 W. Spaulding. Volunteers sign in and out of the job site recording and documenting the hours worked.

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials , Donated labor	Bond Financing	Total Match
25 N. Woodlawn	Various Dates					\$23,905		
273 W. Spaulding						\$8,150		

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
0	0	0	0	0

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period									
	Total	Minority Business Enterprises				White Non-Hispanic			
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic				
Contracts									
Dollar Amount	0	0	0	0	0	0			
Number	0	0	0	0	0	0			
Sub-Contracts									
Number	0	0	0	0	0	0			
Dollar Amount	0	0	0	0	0	0			
	Total	Women Business Enterprises	Male						
Contracts									
Dollar Amount	120,399	0	120,399						
Number	2	0	2						
Sub-Contracts									
Number	0	0	0						
Dollar Amount	0	0	0						

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition

Parcels Acquired	0	0			
Businesses Displaced	0	0			
Nonprofit Organizations Displaced	0	0			
Households Temporarily Relocated, not Displaced	0	0			
Households Displaced	Total	Minority Property Enterprises			White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	
Number	0	0	0	0	0
Cost	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	15	37
Number of Non-Homeless households to be provided affordable housing units	136	59
Number of Special-Needs households to be provided affordable housing units	15	0
Total	166	96

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	20	37
Number of households supported through The Production of New Units	2	1
Number of households supported through Rehab of Existing Units	49	58
Number of households supported through Acquisition of Existing Units	0	0
Total	76	96

Table 12 – Number of Households Supported

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

The City deferred implementation of a number of its planned programs, down payment assistance and infill housing development because of staff transitions. Outcomes for CDBG and HOME funded affordable housing programs that were implemented generally met goals. The Community Development Division has encountered changes in staffing during the past program year.

Minor home repair program assisted 40 households and Community Action acting as a Subrecipient provided 18 additional households minor home repair. The average project provided \$17,000 in assistance mainly new roofs and furnaces/water heaters. Funding does not go as far as it had in the past because of increases in costs for roofs and other home repairs. The cost for labor and materials have increased, causing the program to run out of funds while maintaining a significant waitlist.

A three unit rental rehab project at 614 NE Capital did not complete during the program year due to substantial delays caused by the pandemic and lack of capacity of the developer. The City repaid HUD \$128,135.22 to cancel this rental rehabilitation projects in July 2024 and is currently working on completing the rehab of the 5 unit apartment building to be operated as recovery housing for people overcoming opioid addition.

The Battle Creek Area Habitat for Humanity completed the new construction of one single family house during PY2024 and is in the process of completing new construction of another address early in PR2025.

City transit canceled a planned CDBG-funded transit infrastructure project to rebuild four bus stops. This funding was reprogrammed in a substantial amendment to the Minor Home Repair program to catch up on the Minor Home Repair wait list. Two HOME funded programs will launch in PY2025 an in-fill housing development program and a down payment assistance program.

The HOME Tenant Based Rental Assistance program has helped address homelessness and other worse case rental housing needs, 37 households were assisted in PY2024.

Discuss how these outcomes will impact future annual action plans.

The City of Battle Creek completed its 2025-2029 Consolidated Plan during Program Year 2024. Code Compliance and Minor Home Repair will remain priorities for funding in future years. The Minor Home Repair program maintains a waiting list and continues to demonstrate a high demand for the program from low-income homeowners. The Tenant Based Rental Assistance program also provided critical assistance that is highly prioritized.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	89	27
Low-income	71	7
Moderate-income	74	4
Total	234	38

Table 13 – Number of Households Served

Narrative Information

Most of the City's affordable housing resources go towards serving families that are Extremely Low-Income. These outcomes demonstrate the City's efforts to foster and maintain affordable housing by preserving affordable owner-occupied housing, helping low-income families maintain their current rental housing, and helping low-income families secure affordable housing.

HOME TBRA assistance provides three to six months of rental assistance to address worst-case housing needs defined as low-income renters who pay more than half of their income in rent and live in seriously substandard housing which included households that are homeless people and those who have been involuntarily placed. HOME TRBA was provided to 37 households consisting of 80 people. This assistance was provided through a sub-recipient agreement with Neighborhoods, Inc. (NIBC) which serves as the HARA (Housing Assistance Resource Agency) for Battle Creek and Calhoun County.

The significant disparity between projected and actual goals in this section is largely due to originally including public service grant outcomes in the action plan. Acquisition of new units is zero out of ten because the City has yet to implement the infill housing program. These outcomes demonstrate the City's efforts to foster and maintain affordable housing by preserving affordable owner-occupied housing and helping low-income families obtain rental housing.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

In May 2024, the Battle Creek Shelter which was opened during the COVID pandemic, closed because of lack of operating funds after the Battle Creek Community Foundation stopped operating as a funder and as the fiduciary. This facility was offering low barrier shelter for 50 men and up to 20 women. The Haven has one outreach worker with visits encampments and works to engage people experiencing homelessness in shelter and substance abuse treatment. The SHARE Center operates a van purchased a van and employs an outreach worker.

In March of 2024, the collaborative planning body for the Calhoun County Continuum of Care switched from Summit Point to the United Way of South Central Michigan, the United Way also serves as the lead for the Kalamazoo County Continuum of Care.

Outreach to homeless people is conducted by the staff of the Haven and the SHARE Center. Staff regularly visit camps of homeless people. Day shelter is provided by the Share Center which is open daily from 8 am to 7 pm., and offers coffee, computer access, bathrooms and laundry facilities. The SHARE Center works closely with the Department of Veterans Affairs to support all the veterans who use the Center and receives funding from Summit Pointe, Battle Creek's Community Mental Health Authority.

Each year the Homeless Coalition organizes a Homeless Health Fair/Project Homeless Connects/VA Stand Down which offers free haircuts, meals, toiletries, blankets, health care services and other services to engage homeless people. In a typical year, the annual outreach event is hosted at the City's recreation facility, Full Blast and serves approximately 300 people in need of housing and services.

HOME-ARP Discussion

The City through a HOME American Rescue Program (ARP) federal grant is providing \$1,095,587 of support for organizations assisting people experiencing homelessness. This funding as been spent as detailed in the HOME ARP funding chart.

HOME American Rescue Program (ARP)	Spent Life-to-Date	Committed to		Remaining		
		Projects	Funds for PY 2025	2022	2023	2024
Haven Transitional Living Program	\$ 252,000.00	\$ 252,000.00			\$ 192,415.00	\$ 59,585.00
Neighborhoods, Inc	\$ 140,250.55	\$ 147,000.00	\$ 6,749.45		\$ 56,488.15	\$ 83,762.40
The SHARE Center	\$ 90,736.76	\$ 111,090.00	\$ 20,353.24		\$ 71,763.50	\$ 18,973.26
City Admin	\$ 90,724.98	\$ 164,338.05	\$ 73,613.07	\$ 39,756.97	\$ 33,521.16	\$ 17,446.85
Gracious Homes	\$ 52,000.00	\$ 52,000.00			\$ 41,153.93	\$ 10,846.07
Upholdings Permanent Supportive Housing	\$ -	\$ 369,158.95	\$ 369,158.95			
	\$ 625,712.29	\$ 1,095,587.00	\$ 469,874.71	\$ 39,756.97	\$ 395,341.74	\$ 190,613.58

Addressing the emergency shelter and transitional housing needs of homeless persons

There is a continuing need for case management to help people connect to housing, employment and services, and rental assistance to help families and individuals move to permanent housing. HOME-ARP funds distributed prioritize case management and other supportive services. Shelter and services for victims of domestic violence are provided by S.A.F.E. Place which is always full and is seeking to expand their programming and stabilize ongoing funding of operations.

There is an unmet need for permanent supportive housing and affordable housing in quality condition for families and individuals. Homeless providers work creatively to obtain private donations, government funding, and foundation funding to fulfill their missions to help homeless people and others leaving unsafe home situations. They work constantly to maintain funding for their current inventory of shelter beds and services. The HOME-ARP planning process also prioritized permanent supportive housing and the City's allocation plan proposes funding for a 55 unit PSH development.

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

The City of Battle Creek Community Development Division plays a limited role in the discharge planning of Calhoun County institutions and systems of care to prevent and address homelessness. Systems of Care include Summit Pointe, the mental health public authority for Calhoun County, the hospitals in Battle Creek and Marshall, state foster care, and those released from county jail. The needs of homeless families and individuals is large and the resources available to address problems are limited.

The numbers of people experiencing homelessness since the ending of the COVID public health emergency have grown. CDBG public services have funded through Legal Services, an Eviction Diversion program provided in the County eviction court room, and VOCES to conduct housing outreach among underserved Spanish speaking people. Because of the increasing costs of materials and labor, the Minor Home Repair program has had growing needs for more funding to prevent the development of a long waiting list. In Program Year 2025, public services will not be funded.

The City is providing resources to the Continuum of Care through the HOME-ARP program. The SHARE Center is providing outreach services at the day center serving people experiencing mental health challenges and homelessness; housing case management through Neighborhoods, Inc.; supportive services to the Life Recovery Programs run by the Haven of Rest for men and women; and drug recovery for homeless women through Gracious Homes. The HOME TBRA program provides first months rent and up to three months of rental assistance to families and individual seeking to avoid or recover from homelessness through a subrecipient, Neighborhoods Inc., which also serves as the Housing Access Resource

Agency (HARA) for Calhoun County.

The Community Development Supervisor serves on the Housing Solutions Board, the decision making body for Calhoun County Continuum of Care of homelessness assistance. This Board meets monthly to discuss coordinated entry and other issues the system is experiencing. The Homeless Coalition is the general membership body of the Continuum of Care and it meets virtually every other month. The leadership for the Continuum of Care changed in March 2024 from Summit Point to the United Way of South Central Michigan. The United Way also serves as the HMIS administer and lead planning body for the Kalamazoo County Continuum of Care. As the new Continuum of Care director works to understand Calhoun County and its system of care, the Housing Solutions Board is expecting to see changes to the current system and will be working on developing a new strategy in the upcoming year.

Homelessness is multifaceted. Each family and individual has their own story of trauma and housing instability. Case managers at the Haven of Rest, the SHARE Center, S.A.F.E. Place, Gracious Homes, and other build relationships to help families and individuals solve the problems that have led to homelessness. The Haven of Rest emergency shelter runs a Jail Ministry works with people in Calhoun County's jail who do not have a place to live after release. CityLinC runs a Second Wind program that links people released from jail with employment and support.

Battle Creek has a large domestic violence shelter called S.A.F.E. Place and the Haven provides emergency shelter to men, women and families with children. Calhoun County does not have a shelter that serves unaccompanied children under the age of 18. This is a gap in services. Kalamazoo as a program of Catholic Charities called the ARK that can sometimes provide shelter to accompanied youth from Calhoun County. Child Protective Services will make referrals for foster care to provide services.

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

There is a shortage of safe, quality, deeply subsidized housing in Battle Creek for extremely low-income families and individuals, but the larger problem is access. Many families or individuals that are unable to locate stable housing are being denied housing because they are perceived to be a higher risk due to a past eviction, poor credit, or a criminal history.

Homeless people can seek housing assistance from Neighborhoods, Inc., located at 47 N Washington Street. A housing case manager works with families and individuals to see if they qualify for available housing assistance. The Haven, S.A.F.E. Place, Neighborhoods, Inc., and the Volunteers of America's Supportive Services for Veteran Families all use the SPDAT, needs assessment tool to prioritize housing services to those in highest need.

Other sources of short term rental and utility assistance include the Calhoun County Department of Health and Human Services State Emergency Relief, the Salvation Army's Social Services Program, Community Action and area churches. Currently, families and individuals in need of housing assistance need to approach each individual organization for assistance. The Haven provides case management to help families and individuals gain a regular income to pay for housing and to access community resources to help prevent further episodes of homelessness.

Goodwill's Financial Opportunities Center has a financial fitness program to help people work through debt and low credit scores. Legal Services provides legal services and eviction prevention. Women's Co-op provides support for women leaving poverty and seeking help through their store, volunteering and the Solutions Highway Program. Neighborhoods, Inc. provides homeownership counseling for those interested and able to own their own home, and also rents units to people recovering from homelessness. The Haven provides adult foster care, 15 units for individuals.

S.A.F.E. Place is a 54-bed emergency shelter for victims and survivors of domestic violence and sex trafficking located in Battle Creek. In addition to the shelter, they provide counseling, advocacy, referrals, and tutoring to survivors and their children. Shelter advocates are available 24/7 and 365 days a year via the crisis line.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The Battle Creek Housing Commission provides subsidized housing through various programs in the City of Battle Creek. The Commission was created on August 9, 1960 through a City ordinance. The five member Housing Commission is appointed to five year terms by the mayor with approval by the City Commission. The Housing Commission owns and manages 320 affordable housing units, administers the Section 8 Housing Choice Voucher program (approximately 640 vouchers of which 150 are devoted to a HUD-VASH program), and owns and manages 14 units of scattered site homeowner units.

The following is a list of the public housing facilities and unit type.

Northside Drive Homes – (16) 2 and 3-bedroom single family homes

Parkway Manor – (84) 1, 2, 3 and 4-bedroom townhomes

Cherry Hill Manor – (150) 1-bedroom apartments

Kellogg Manor – (70) Efficiency and 1-bedroom apartments

Home Ownership Program – (14 of 100 Turnkey III units remain to be sold) 2, 3, and 4-bedroom single family homes.

In July 205, the Battle Creek Housing Commision completed converting its portfolio to the Rental Housing Demonstration (RAD) to multi-family contract for Project Based Vouchers.

In addition to the public housing units and the scattered site homeowner units, the Battle Creek Housing Commission administers the Housing Choice Voucher program. Currently, it administers and has a budget for 809 vouchers in Battle Creek, Albion and Portage. Of those 809, 640 are currently being utilized. The majority of vouchers utilized are in Battle Creek (541), some ported out to other communities, and 30 in the Albion area.

The Housing Commission assists mostly extremely low income and very low-income households in its public housing units and mostly very low and low-income families with Housing Choice vouchers. The homeownership program predominantly assists low-income households. According to Commission representatives, families interested in the homeownership program must earn at least \$18,000 per year and have full time employment. Many of the existing residents of the homeowner units were former public housing and/or Housing Choice voucher recipients.

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

The Battle Creek Housing Commission built 100 smaller homes in the 1990s in the Turnkey III Homeownership Program. The Housing Commission has 14 of the original 100 homes left in their inventory. They are working with the current families to qualify for bank loans to purchase the remaining homes in the program.

The Executive Director of the Battle Creek Housing Commission holds regular meetings with the residents of the three large scale developments, Parkway Manor for families, Kellogg House for singles and couples with disabilities and Cherry Hill for older adults, age 50 and over. The meetings are also used to inform residents of planned facilities improvements and receive resident input on needed improvements. The meetings are listed in the monthly newsletter distributed to all residents.

The five-member Board of Directors has one resident commission who provides input on policy and decision making. The Supervisor of Community Development serves as a Board member for the Housing Commision.

Actions taken to provide assistance to troubled PHAs

The Battle Creek Housing Commission is not a troubled PHA.

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

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

The work to reduce the effects of public policies that serve as barriers to the construction of affordable housing remains a challenge. The City is working on several fronts to lower costs and other impediments to development. The city is working with numerous developers to encourage the submission of applications to the Low-Income Housing Tax Credit (LIHTC) Program . The City Commission has granted Pilots in Lieu of Taxes (PILOTS) to several proposed developments and provided options to purchase city-owned land to developers. A development on the site of a former K-Mart building was approved in the 2023 LIHTC competition. The City has engaged a consultant to help its relationship with Michigan State Housing Development Authority (MSHDA) and developers.

In 2023, the City of Battle Creek has received a \$50,000 planning grant from MSHDA to help develop an Affordable Housing strategy to update its 2018 Master Plan. This community engagement and consultation process for the affordable housing strategy will be incorporated in the citizen participation plan for the development of the 2025-2029 Consolidated Plan. The Affordable Housing strategy will be completed in early 2026. The initial public meetings will be dual purpose for the development of both plans, as will a public survey and consultations with community leaders. The city is also in the process of renewing its approval as a Redevelopment Ready Community.

The City has undertaken several actions to reduce the costs of building new housing and encourage development of housing:

On November 11, 2020, the City Commission passed a zoning amendment that made Accessory Dwelling Units (ADU) allowable on parcels with adequate space and lowered the minimum required square footage from at least 750 to at least 450 square feet.

Taking effect in October 2023, the City's Building Inspection Division changed the fee structure for building permits to lower costs for smaller projects and increase the costs for larger projects. The City Commission approved a change to the building permit fee structure changing the calculation from a square foot model to a Standard Valuation model, which uses industry accepted baselines for estimating construction costs. Now, the value of a project is determined using: 1) A signed contract showing the cost of construction materials and labor; 2) An Architects cost estimate; 3) International Code Council's Building Valuation Data Table, available at City Hall or online; or 4) An agreed value between the city and the developer/homeowner.

To encourage residential redevelopment the City has approved standard residential building plans which

are preapproved and lower the time and expense of receiving planning and building inspections approval before construction can begin, this preapproval is to encourage the development of infill housing.

To reduce the cost of new construction, the Chief Building Official has approved the use of shallow frost protected footings instead of a traditional full depth crawl space or basement foundation. Habitat for Humanity is using this method for the foundations of its five new builds in the Urbandale neighborhood.

The City continues its dangerous and vacant and abandoned inspection process to encourage the redevelopment or demolition of unused buildings in Battle Creek's neighborhoods and commercial areas. Buildings that have been identified and put into these programs are inspected monthly by code officials and then building owners are billed for these inspections. The City arranges for the mowing of lawns around these buildings and the fees for mowing are billed to the owners and if unpaid are added annually to tax bills.

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

Public funding for community development activities is limited and the problems to be addressed in neighborhoods are complex and numerous. Strategies are based on giving neighborhoods tools to address blight and make rentals safe by funding code compliance and demolition; eviction diversion and housing case management services to help people stay housed or secure new housing; and home repair for those who cannot afford to repair their homes. CDBG funding was also used for program delivery costs, public engagement and strategic planning for 20% of the CDBG allocation. Planning and public engagement has been a key to pursuing additional funds from the State and local funders.

For the HOME program, funds were allocated to preserve affordable housing by funding rehabilitation of housing and by providing tenant-based rental assistance in partnership with nonprofit organizations.

While almost all funded activities occur in low- and moderate-income areas, the unmet need is large. The City has hundreds of registered vacant buildings; nearly a thousand people experience homelessness each year; rents are increasing dramatically; and, approximately 3,550 households are severely housing cost burdened meaning that they pay over 50% of their income in housing and utility costs. Funds are targeted to be strategically used to address community needs

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

Any housing unit that is rehabilitated, modernized, weatherized, or reconstructed using City or entitlement dollars must address lead paint hazards that are present. When Lead Inspections/Risk Assessments are required, they are done before work begins and when finished a Lead Clearance is required, all provided by a licensed Lead Inspector. All sub-recipients must comply with federal regulations for lead hazard reduction and/or abatement in an effort to reduce the hazards of lead paint in the community. Every homeowner is provided a pamphlet education about the lead risks before any

rehabilitation work begins. The City verifies these requirements have been met by monitoring programs yearly.

The Calhoun County Public Health Department and the City of Battle Creek started a Lead Poisoning Prevention Task Force in January of 2016 as a way for agencies within Calhoun County to share information about lead resources and activities. The initial focus was on stakeholders that serve areas that have had high levels of positive lead testing in the past.

The task force is a diverse group with representation from state, county, city, village and township governments; public health agencies, early childhood service providers, and non-profit housing providers. Up until the start of the pandemic the group met monthly to create action in three areas: increasing lead testing in children, decreasing lead exposures in homes and the environment, and creating greater public awareness about the risks of lead poisoning.

Since the beginning of the pandemic the task force has been on hiatus, but a number of the partners have continued to coordinate activities. The City and Community Action continue to implement the \$1.5 million per year CHIP Medicaid Lead Hazard Control Grant from the Michigan Department of Health and Human Services (MDHHS). The City was also awarded a \$3.4 Lead Hazard Control and Healthy Homes grant from HUD in 2020 and has abated over 37 homes with this funding, these funding ends October 31, 2025.

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

CDBG and HOME funded programs serve as the cornerstone of the City's efforts to address community development needs, including poverty. Programs and projects funded which addressed the causes, as well as the symptoms of poverty, included the following:

- Housing rehabilitation Minor Home Repair for low- and moderate-income homeowners unable to secure financing to address health, safety, and accessibility issues in their homes.
- Tenant-based Rental Assistance to assist people that are trying to get back on their feet with access to affordable housing.
- Eviction diversion provided by Legal Services, and housing outreach by VOCES for families who are Spanish speaking.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The City of Battle Creek continues to improve, and expand on, its collaborative efforts. Efforts are made to fill gaps identified through Consolidated Planning Workshop sessions, outreach sessions with citizen groups, meetings of local collaborative bodies and consultations with sub-recipients and other service organizations with similar missions. Staff will continue to identify and reach out to agencies and organizations that may be key partners in addressing the needs of low and moderate income persons within Battle Creek.

Community Development staff are involved with the Battle Creek Area Homeless Coalition, the Housing Solutions Board, the Battle Creek Area Realtors Association, the Battle Creek Housing Commission and various other boards and committees. As required, staff also continue to meet with many agencies in the community and provide technical assistance for those in need.

The City and the Calhoun County Land Bank Authority (CCLBA) continue to collaborate on housing and neighborhood development activities in Battle Creek neighborhoods. The City, Neighborhoods Inc., Community Action, Habitat for Humanity, and the CCLBA and other local agencies continue to work together to coordinate housing services and programs to families and to do joint planning to increase neighborhood impact. Working groups to coordinate the work of agencies building wheel chair ramps, collaborate in doing outreach to local and MBE/WBE contractors, to develop new lead abatement programs and to review neighborhood data and choose target areas for services, are examples of progress being made in this area.

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

Actions taken to enhance coordination between public and private housing and social service agencies include the City's participation in rental property owner outreach, the Calhoun County Lead Poisoning Prevention Task Force, board membership on the Battle Creek Housing Commission and membership on the Housing Solutions Board, the decision making body for Battle Creek/Calhoun County's Continuum of Care.

The WK Kellogg Foundation recently funded a housing assessment of for the City of Battle Creek and is conducting quarterly housing collaboration sessions. The WK Kellogg Foundation along with LISC Kalamazoo, Battle Creek Unlimited, the City of Battle Creek and the Calhoun County Land Bank are planning to create a Housing Trust Fund to invest more funds into the development of affordable housing.

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

As a condition of receiving HOME and other HUD formula based funding, the City of Battle Creek is required to certify that it will affirmatively further fair housing. This requires the City to identify and address impediments to fair housing choice. HUD defines an impediment to fair housing choice as: Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices; and any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

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

The City of Battle Creek monitored its CDBG and HOME subrecipients annually. All programs (including those internally administered) are required to submit quarterly progress reports. Community Development staff meet two times a month to discuss comprehensive planning and progress towards addressing priority needs.

Regarding the HOME program: CFR 92.251 (b) (3) Frequency of inspections states that "the participating jurisdiction must conduct an initial property inspection to identify the deficiencies that must be addressed. The participating jurisdiction must conduct progress and final inspections to determine that work was done in accordance with work write-ups."

The City of Battle Creek has established a policy that requires at least three inspections on every HOME-funded Homeowner Rehab, ADR and Rental Rehab project. The City's Housing Rehab Coordinator inspects properties and provides a written statement documenting each inspection and its results for the file. The Housing Rehab Coordinator does a pre-construction inspection with a cost specification before any rehab project is approved, then a mid-construction inspection is scheduled around the second draw of funds or when the project is nearing its mid-point. Before the final draw of funds is made, the Housing Rehab Coordinator checks to see that all City permits have been finalized and a certificate of occupancy has been issued, and then conducts a final inspection.

All units assisted with TBRA receive a NSPIRE inspection by trained sub-recipient staff person and units assisted are required to be registered rentals with the City of Battle Creek. All registered rentals have to be inspected every three to six years depending on the renewal schedule and whether any complaints have been received.

All Rehab properties, whether assisted with HOME funds or CHDO-Proceeds are inspected the required at least three times during the construction process and within 12 months of project completion. They are then inspected every three years by a Code Compliance Officer. Annually, the nonprofit owner of the rental rehab properties certifies that each property is suitable for occupancy, taking into account State and local health, safety, and other applicable codes, ordinances and requirements.

Each year the City hosts a contractor recruitment event and advertises for new contractors including minority, women and veteran owned business. The City attends the monthly breakfast for contractors organized by the local builders association and the Calhoun County Land Bank.

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 following measures were undertaken in accordance with the City's Citizen Participation Plan to ensure citizens have reasonable notice and an opportunity to comment on performance reports: The City notified the public via a public notice ad in the Shopper News on August 28, 2025 that under the Housing and Community Development Act of 1974, as amended and the Cranston- Gonzalez National Affordable Housing Act of 1990, the City of Battle Creek is required to do the following:

- Complete a performance report detailing the progress of the Community Development Block Grant and HOME Investment Partnership programs.
- Make the report available for public comment for at least 15 days.
- Hold a public hearing.

The Battle Creek City Commission held a public hearing on Tuesday, September 16, 2025, at 7:00 p.m. for the purposes of hearing public comment on the Consolidated Annual Performance Evaluation Report (CAPER).

A draft copy of the CAPER was made available from August 28, 2025 and will remain posted on the City's website.

A digital copy of the CAPER is available through the Community Development page on the City's website. Accomplishment data will be shared during public engagement sessions held at Neighborhood Planning Council meetings.

In all public notices, the City of Battle Creek notes that it will provide necessary auxiliary aids and services, such as signers for the hearing impaired and audio tapes of printed materials being considered in a public meeting with a seven day notice to the City. Individuals with disabilities should contact the City's City Clerk to arrange for accommodations. The City of Battle Creek will also provide interpretation services and translation of any printed material with written notice.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The City has ended its Rental Rehabilitation Program and in July 2024 paid back HUD \$128,135.22 for failure to deliver a national objective of three units of affordable rental housing at 614 NE Capital. Rental rehabilitation is a needed program in the community but the City has had difficulty getting such projects to completion because of the nature of self-employed, small developers and their limited access to capital to complete required work.

The City has reserved funding to a Youth Village Early Learning and Childhood Center with CDBG funds in the North Central/Washington Height Target area. This project has delayed starting because the environmental assessment found soil contaminated with heavy metals on the property parcels. Plans to remediate this situation are being developed and must be completed before the project can move forward.

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

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

The City does not have an BEDI grants.

CR-50 - HOME 24 CFR 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in 24 CFR §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

The City's HOME program has funded 4 rental housing rehabilitations in the past, annually the developer, Neighborhoods, Inc. submits a certification with the date of an annual inspection, and the income and race characteristics of the current residents. All four are occupied by income qualified tenants as certified by the developer, Neighborhoods, Inc. In the Tenant Based Rental Assistance program administered by the same subrecipient, Neighborhoods, staff ensure that assisted units are registered rentals and are conducting a housing inspection before rental assistance is provided.

The addresses of the four rental houses rehabbed with HOME funding are 94 Harvard, 96 Harvard, 66 Harvard and 18 N Wabash. As part of the rental registration process, the City inspects rental units once every six years.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 24 CFR 91.520(e) and 24 CFR 92.351(a)

No City of Battle Creek rental or homebuyer projects contain five or more HOME-assisted housing units. All properties assisted with HOME funds for HOR or ADR are single family properties. All HOME sub-recipients and nonprofit CHDO developers follow Fair Housing law and principles.

Currently all assisted properties are occupied. ADR properties and rental rehab properties are widely advertised in the local papers, at the Battle Creek Housing Commission and on the internet. All properties were sold or rented within the regulatory timeframes.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

During PY2024, the city received \$18,673 in program income from the proceeds of mortgage payoffs from previous home rehab programs that were guaranteed by no interest, no payment mortgages due at the sale of the home or death of the homeowner. All program income was added to the amount of funds available for the Minor Home Repair program. The city conducted 40 minor home repair projects during the program year which assisted homeowners in need of health and safety home repairs and have their household income documented to be below 80% of area median income.

In July 2024, the city paid back CDBG funds for not providing a national objective after five years of having the project open. The developer failed to complete the rehab after the demolition of the interior of the building occurred.

For 614 NE Capital, funds were expended from six different years of CDBG funding. Please see the chart that shows the different years of CDBG funding that were expended.

PY 2016	\$	27,452.50
PY 2017	\$	90,407.55
PY 2018	\$	8,081.42
PY 2020	\$	525.00
PY 2021	\$	1,500.00
PY 2022	\$	300.00
Amount to pay back	\$	128,266.47

The City signed a Rental Rehabilitation written agreement for the rehabilitation of three rental housing apartment units at 614 NE Capital on 5/27/2020 using CDBG entitlement funds. The city paid the 2016 and 2017 funds back to a local account in the amount of \$117,860.05. These funds were expended on minor home repair projects in PY2024.

**Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k)
(STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 24 CFR 91.320(j)**

The City of Battle Creek continues to strengthen its relationships with the Calhoun County Land Bank Authority and their efforts to work in neighborhood target areas to create opportunities for in-fill housing. Battle Creek has two organizations that have been Community Housing Development Organizations (CHDO) in the past, Neighborhoods, Inc also known as NIBC, and the Battle Creek Area Habitat for Humanity. Both NIBC and Habitat for Humanity have new leadership.

Battle Creek Area Habitat for Humanity is currently certified as a CHDO and has signed written agreements for HOME funding to newly construct two new single family homes, 25 N. Woodlawn and 273 W. Spaulding in the Urbandale area of the City. Habitat identifies homebuyers during the initial stages of homebuilding. During PY2024, 25 N. Woodlawn was sold to a qualified homebuyer. Habitat will complete construction of 273 W. Spaulding early in PY2025 and has already identified as qualified home buyer.

The City of Battle Creek is also working with a developer of permanent supportive housing, Upholdings, to develop 55 units of permanent supportive housing on land that the City currently owns. Low income housing tax credits would pay for the construction of the one bedroom apartments, and housing choice vouchers from the Battle Creek Housing Commission would contribute to the operating costs.

The City also owns other two other large vacant parcels that are being considered by developers for affordable housing using the Low Income Housing Tax Credit program. Hollander Development has been funded under the LIHTC program to develop 48 units of workforce housing at the former K Mart site.

CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	0	0	0	0	0
Total Labor Hours	0	0			
Total Section 3 Worker Hours	0	0			
Total Targeted Section 3 Worker Hours	0	0			

Table 14 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0	0			
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0	0			
Direct, on-the job training (including apprenticeships).	0	0			
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0	0			
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0	0			
Outreach efforts to identify and secure bids from Section 3 business concerns.	0	0			
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0	0			
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0	0			
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0	0			
Held one or more job fairs.	0	0			
Provided or connected residents with supportive services that can provide direct services or referrals.	0	0			
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	0	0			
Assisted residents with finding child care.	0	0			
Assisted residents to apply for, or attend community college or a four year educational institution.	0	0			
Assisted residents to apply for, or attend vocational/technical training.	0	0			
Assisted residents to obtain financial literacy training and/or coaching.	0	0			
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0	0			
Provided or connected residents with training on computer use or online technologies.	0	0			
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0	0			
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0	0			

Other.	0	0		
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Table 15 – Qualitative Efforts - Number of Activities by Program

Narrative

None of the activities funded by the City of Battle Creek in Program Year 2024 triggered Section 3 requirements.