

City of Battle Creek, Michigan
Community Development



2019-20 CAPER
(DRAFT)

Prepared for the
U.S. Department of Housing
and Urban Development



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CR-05 - Goals and Outcomes

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

91.520(a)

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

The City of Battle Creek, through its Community Development Division, is the entitlement grant administrator of the City's allocation of Community Development Block Grant (CDBG) program and HOME Investment Partnership (HOME) program. The Consolidated Annual Performance and Evaluation Report (CAPER) meets the reporting requirements in Section 104(e) of the Housing and Community Development Act of 1974, as amended, 24 CFR Part 91 regarding the Consolidated Planning requirements.

The CAPER provides information on the outcomes of projects and activities proposed in the City's 2019-20 Annual Action Plan highlighting the community development initiatives accomplished during the period of July 1, 2019 through June 30, 2020. This is the City of Battle Creek's fifth and final annual performance report for the 2015 – 2019 Consolidated Plan.

In the 2019-20 program year the City of Battle Creek's Community Development Division made progress towards fulfilling the goals of the City's 2015-19 Consolidated Plan by administering programs and engaging in numerous collaborative efforts to address community needs prioritized in the plan. Because programs funded with CDBG and HOME funds have numeric goals associated with them in the Department of Housing and Urban Development's (HUD) online reporting system (called IDIS), they are evaluated in this report quantitatively using charts and maps as well as qualitatively through narrative. Much of the collaborative work does not have numeric goals associated with it in IDIS, so the results are only reported in the narratives.

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)

Includes 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.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Demolition	Non-Housing Community Development Blight elimination	CDBG: \$	Buildings Demolished	Buildings	26	16	61.54%	1	0	-
Housing Code Enforcement	Affordable Housing Non-Housing Community Development	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	12,500	15,474	123.38%	2500	1906	76.24%
Lead Hazard Assessment	Affordable Housing	CDBG: \$	Other	Other	20	6	30.00%	5	2	40.00%
Placemaking and strategic planning	Affordable Housing Non-Housing Community Development	CDBG: \$	Other	Other	5	5	100.00%	1	1	100.00%
Production of new rental units	Affordable Housing	CDBG: \$	Rental units constructed	Household Housing Unit	20	1	5.00%	4	0	0.00%
Program Delivery	Program Administration	CDBG: \$ / HOME: \$	Other	Other	5	5	100.00%	1	1	100.00%
Public Infrastructure / Street improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	1	1	100.00%	-	-	-
Public Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	200	0	0.00%	-	-	-
Rehabilitation and repair of homeowner housing	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	280	230	82.15%	64	68	101.56%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Rehabilitation of existing rental units	Affordable Housing	CDBG: / HOME: \$	Rental units rehabilitated	Household Housing Unit	16	3	18.75%	4	0	0.00%
Rental Assistance	Affordable Housing Homeless	HOME: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	72	28	38.89%	0	0	20%

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

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The City of Battle Creek's 2015-19 Consolidated Plan detailed 15 priority need areas to be addressed. All strategies and goals are associated in the plan with one or more of these priority needs:

- Improve property conditions in LMI neighborhoods*
- Reduce blighted vacant and abandoned buildings*
- Preserve affordable housing
- Increase affordable housing through new units
- Ensure the safety of rental housing*
- Help LMI households sustain their housing
- Help people access affordable housing
- Improve fair housing awareness and accountability*
- Improve vibrancy and amenities in LMI areas
- Increase public services to access housing and employment
- Increase community engagement*
- Increase employment opportunities and training
- Infrastructure improvements: place-making
- Infrastructure that supports affordable housing
- Support collaborative homelessness efforts*

Please note that Community Development staff have simplified this list for presentations to the public in order to make it easier to communicate where community development resources are being invested. The simplified list is eight priority needs including the six that are starred above. Needs related to increasing, preserving, and sustaining people in housing are condensed into "develop, preserve and help people access quality, affordable housing". Needs that address vibrancy, neighborhood amenities, infrastructure improvements and place-making are condensed into "improve amenities and infrastructure in LMI areas through place-making".

"Increase employment opportunities and training" is left off the list in public presentations because while it is a priority for the community, it is largely being addressed through a larger community-wide economic development effort called BC Vision. This effort is being led and supported by a wide range of community stakeholders including the Kellogg Company, the WK Kellogg Foundation, the Battle Creek Community Foundation, Battle Creek Unlimited, local school districts, the WK Kellogg Community College, and dozens of non-profits, employers, small businesses, and resident groups. BC Vision has six action teams: College and Career Readiness, Kindergarten Readiness, Culture of Vitality, Workforce Development, Small Business, and Large Business.

The City of Battle Creek is very much involved in the work of BC Vision, particularly around small

business development and creating a culture of vitality in the community. The Battle Creek City Manager is on the BC Vision steering committee and the Assistant City Manager is one of the co-chairs off the Culture of Vitality action team. The City is also playing an active role with other stakeholders in the development of a comprehensive, community-wide economic development plan.

The following accomplishments of the City and its partners from the 2019-20 program year highlight the progress being made to address priority needs:

Improve property conditions in LMI neighborhoods

- Code Compliance completed 1,906 enforcements within CDBG target areas, addressing blight, health and safety issues related to housing.
- Code Compliance issued 37 vouchers for free paint to property owners with peeling paint violations (funded with local resources).
- The Calhoun County Land Bank Authority (CCLBA) neighborhood mow and maintenance program enlisted seven different community groups to mow and maintain 300 vacant lots in the City of Battle Creek throughout the program year. The program provides non-profit groups, churches, youth employment and neighborhood groups that commit to mowing and maintaining 20 vacant lots per assignment with a \$3,000 stipend for the season.

Reduce blighted vacant and abandoned buildings

- Code Compliance completed 68 new enforcements on vacant, abandoned or dangerous buildings in CDBG target areas. Roughly 400 vacant or abandoned buildings were monitored monthly during the program year.

Ensure the safety of rental housing

- Code Compliance completed 637 rental inspections in CDBG target areas.
- Participated in the Rental Housing Roundtable, a sub-committee of the Battle Creek Area Homeless Coalition which meets monthly and organizes quarterly Landlord Dinner & Discussions to improve relationships with area rental property owners and provide education about available supportive services, utility assistance, fair housing, legal rights and responsibilities, rental registration, code compliance and other topics. Attendance, event evaluations and feedback have been overwhelmingly positive.

Develop, preserve and help people access quality, affordable housing

- The City's Minor Home Repair program completed 65 projects for low and moderate income home owners.
- The City's HOME Homeowner Rehab program completed construction on two projects in a

targeted area in the North Central Neighborhood Planning Council (NPC).

- Habitat for Humanity completed rehabilitation and sale of a property in the Post/Franklin CDBG target area resold to a low-income first time homebuyer.
- The City's CHIP Medicaid-funded Lead Safe Program completed full lead abatement of 21 residential units.

Improve fair housing awareness and accountability

- City staff serve as members of the “Beyond Separation” Design Team of the Truth, Racial Healing, and Transformation (TRHT) Initiative. TRHT is a community-wide collaborative initiative funded by the W.K. Kellogg Foundation focused on creating a racial equity movement in Battle Creek. The Beyond Separation team is focused on housing and addressing segregation and is comprised of representatives from the City, the Battle Creek Area Association of Realtors, the Fair Housing Center of Southwest Michigan, the Urban League, and community members.
- Beyond Separation team created a 10 page homebuyers guide as a response to an ask from the African American community to provide better information about the home buying process. The guide uses all local pictures and models and is being disseminated by the Urban League, the City, and the Realtor Association. Available at: www.battlecreekmi.gov/566
- Beyond Separation held a community forum on housing and segregation at New Level Sports in February with over 50 participants. The forum promoted the home buyer guide and was used to gather input and data for the City’s Consolidated Plan and the Beyond Separation strategic plan.
- Staff continues to work with the City’s Human Relations board, which reviews and advises on fair housing issues and the results of systemic investigations.
- The Fair Housing Center of Southwest Michigan conducted 9 fair housing trainings that resulted in 74 individuals being trained on fair housing rights.
- Staff created a 2019 Fair Housing Report which chronicled four years of Fair Housing work in Battle Creek using source documents and narrative collected from City staff activities, Fair Housing Center trainings, systemic investigations, and events; Human Relations Board community engagement sessions; and TRHT events and initiatives. The report is available online at: www.battlecreekmi.gov/566

Increase community engagement

- Community Development staff completed four workshops on community needs with neighborhood planning councils. These were in addition to four public hearings held annually as part of the planning and reporting process for the annual action plan.
- Staff created a community development needs survey and distributed to all properties in Battle Creek and surrounding townships via mailed water bills and social media resulting in over 900 completed surveys. Both quantitative and qualitative data were collected, themed and incorporated into the City’s Consolidated Planning process. This included data theming workshops with the community involving more than 40 community leaders from local agencies

and community groups.

- Staff worked with Post/Franklin NPC members to develop a housing intervention strategy for the Post/Franklin CDBG Target Area. The planning process used the city's Neighborhood Intel system (<https://mi-battlecreek.dynamo.city>) to do analysis of neighborhood conditions, identify vulnerable populations and determine which intervention ideas would have the greatest impact. Information about housing resources from five different programs were distributed to 450 households, including the City's Lead Safe, Minor Home Repair, Paint Voucher programs. Each household was sent a mailer and visited door-to-door by volunteers from the BC Police Department, city staff, the Neighborhood Planning Council, and local churches.

Improve amenities and infrastructure in LMI areas through place-making

- No streets projects were planned for the 2019-20 program year.

Support collaborative homelessness efforts

- Community Development staff participated in the Homeless Coalition of Greater Battle Creek and Calhoun County, attending monthly meetings, and participating on various sub-committees.
- The City of Battle Creek's Parks and Recreation facility, Full Blast, hosted and City staff helped organize the 2019 Homeless Health Fair and VA Stand Down attended by over 500 homeless individuals.
- In response to the COVID crisis, the City converted its Full Blast recreational facility into a temporary homeless shelter to meet the additional demand for socially distanced shelter.

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	41	0
Black or African American	19	2
Asian	1	1
American Indian or American Native	0	0
Black/African American & White	1	0
Other Multi-Racial	3	0
Total	65	3
Hispanic	2	0
Not Hispanic	63	3

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 served through the minor home repair program, the HOME home owner rehab program, and the HOME Acquisition/Development/Resale Program

African-Americans made up 30.8 percent of beneficiaries served by City housing programs, a level just below what is considered proportionate to the need. While African Americans make up 16.6 percent of the general population in Battle Creek, they comprise 42 percent of Battle Creek's severe housing cost burdened population and 41 percent of the low- and moderate- income population. Since City housing programs are targeted at low- and moderate- income families, in particular those that experience housing cost hardships, the expectation is that roughly 40 percent of the beneficiaries of our program would be African American. This is the second year (of the last six) that African Americans have made up less than 40% of beneficiaries.

Hispanic and Latino persons make up 6.7 percent of the population, but only 2.9 percent of beneficiaries of CDBG and HOME programs in the 2019-20 program year. Participation is typically between zero and three percent, so while better than most recent years, this continues a long standing trend of under representation in City programs.

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	CDBG	1,188,872	1,218,907
HOME	HOME	254,827	91,394

Table 3 - Resources Made Available

*CDBG available:

- CDBG General Administration \$109,000
- Strategic Planning \$128,774
- Code Enforcement \$230,000
- Housing Rehab – Minor Home Repair \$635,000
- Rental Rehabilitation Program \$175,000
- Demolition Program \$10,000

HOME available:

- HOME General Administration \$25,482
- Home Owner Rehabilitation \$109,345
- Acquisition/Development/Resale \$120,000

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Fremont/McKinley Revitalization Area	15	24	
Northcentral Revitalization Area	20	29	
Post/Franklin Revitalization Area	40	29	
Urbandale Revitalization Area	10	3	
Wilson/Coburn Revitalization Area	15	11	

Table 4 – Identify the geographic distribution and location of investments

The Northcentral and Post/Franklin Revitalization Area received the most CDBG and HOME resources. The HOME homeowner rehab and ADR programs were targeted in these two neighborhoods. There has been a concerted effort to layer programs and resources from a number of different stakeholders in these neighborhoods including the City's Community Development, Code

Compliance and Police Departments; Neighborhoods Inc.; the Calhoun County Land Bank Authority; and Neighborhood Planning Councils #1 and #2. Stakeholders partnered to do outreach and coordinate services to families resulting significantly higher participation rates among residents and a tight geographic concentration of project sites.

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., Community Action, and the CCLBA.

- The \$3.8 million CCLBA grant from Michigan Homeowner Assistance Nonprofit Housing Corp and MSHDA Help for the Hardest Hit Blight Program was extended until September 1, 2019.
- Community Action Agency completed 42 minor home repair projects for seniors totaling \$117,425 for seniors. The program is funded by the Calhoun County Senior Millage.
- Neighborhoods, Inc of Battle Creek completed completed 33 Federal Home Loan Bank rehab projects totaling \$253,021 CDBG target areas in the past year.
- The Homeless Coalition of Battle Creek and Calhoun County also administered \$307,123 of HUD Continuum of Care funds.
- The City's Lead Safe Program completed 18 full lead abatement projects. The program is funded through a \$1.5 million grant from the Michigan Department of Health and Human Services.
- Code Compliance Division issued 42 vouchers totaling \$3,325 for free paint to property owners with peeling paint violations. This program is funded with city general funds.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	\$274,898
2. Match contributed during current Federal fiscal year	\$0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$274,898
4. Match liability for current Federal fiscal year	\$7,490
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$267,408

Table 5 – Fiscal Year Summary - HOME Match Report

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
		0	0	0	0	0	0	0
		0	0	0	0	0	0	0

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 begining 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 \$
\$18,334.50	0	\$18,334.50	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		0	0	0	0	0
Amount		0	0	0	0	0
Number		0	0	0	0	0
Sub-Contracts						
Number		0	0	0	0	0
Dollar		0	0	0	0	0
Amount		0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar		0	0	0	0	0
Amount		0	0	0	0	0
Number		0	0	0	0	0
Sub-Contracts						
Number		0	0	0	0	0
Dollar		0	0	0	0	0
Amount		0	0	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	0	0	0	0	0	0
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		
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic
Number	0	0	0	0
Cost	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	0	
Number of Non-Homeless households to be provided affordable housing units	42	12
Number of Special-Needs households to be provided affordable housing units	22	6
Total	64	19

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	62	67
Number of households supported through Acquisition of Existing Units	2	1
Total	64	68

Table 12 – Number of Households Supported

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

Outcomes for CDBG and HOME funded affordable housing programs generally met goals. Some activities were affected by delays caused by the coronavirus epidemic, typically those involving larger construction projects like the ADR program and the Rent Rehab program.

All HUD funded programs were halted in March 2020 due to the onset of the coronavirus epidemic. Staff worked remotely and developed protocols to restart construction programs. Minor home repair was back up and running by April, largely providing emergency type services such as repairs to restore heat or water service or outdoor work that easily facilitated social distancing such as roof replacement.

Construction on other HUD funded programs did not resume until after a more stringent coronavirus protocol was put in place in late May. Code compliance activities resumed in April.

Minor home repair program outcomes exceeded the goal. One of two ADR projects was completed. No rental rehab program units were completed, though seven units are currently under construction. Two of four homeowner rehab projects were completed.

Discuss how these outcomes will impact future annual action plans.

The City begins a new Consolidated Plan in the next program year so a number of new programs are being created and other established plans are being tweaked to be more impactful, however those changes are largely the product of the consolidated planning effort. That said, the coronavirus pandemic has created an immediate and critical need for temporary shelter for the homeless, rent assistance, utility assistance, and housing case management. These needs are being addressed using CARES Act CDBG-CV funds and are detailed in the Amended 2019 Annual Action Plan on the City's website: www.battlecreekmi.gov/182

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	45	3
Low-income	5	0
Moderate-income	15	0
Total	65	3

Table 13 – Number of Households Served

Narrative Information

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

Outreach to homeless people is conducted by the staff of the SHARE Center. Staff regularly visit camps of homeless people and provide a day shelter which offers coffee, computer access, bathrooms and laundry facilities. The SHARE Center is open daily from 8:00 am-8:00 pm. During bad weather, it stays open 24 hours a day. It has expanded its meal schedule and sees an average of 120 people per day. The SHARE Center works closely with the Department of Veterans Affairs to support all the veterans who use the Center, is funded by the Michigan State Housing Development Authority's Emergency Solutions Grant program and funding from Summit Pointe, Battle Creek's Community Mental Health Authority. The SHARE Center also houses Summit Pointe's Housing program. The SHARE Center uses HMIS and uses its assessment tool, the SPDAT. Staff at the Haven and S.A.F.E. Place also engage people in services and help find housing. The VA also has outreach staff who work with the shelters to enroll homeless veterans in services. The Ark of Kalamazoo also conducts outreach in Battle Creek to engage homeless youth under the age of 18.

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 2019, the annual outreach event was hosted at the City's recreation facility, Full Blast and served almost 500 people in need of housing and services.

Addressing the emergency shelter and transitional housing needs of homeless persons

While the City of Battle Creek's inventory of emergency and transitional beds is usually adequate to fill the need of homeless people, the coronavirus epidemic and the requirement to social distance has created a severe shortfall. This was addressed in the short term with the conversion of the City's Full Blast recreational facility into a homeless shelter. A long term solution is currently being worked on that involves opening another permanent shelter facility close to the Haven of Rest and City Hall.

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. Cares Act CDBG-CV funds are being used to address these needs. 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.

This is an unmet need in permanent supportive housing and in 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.

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

Organizations that provide homelessness prevention in Battle Creek include Neighborhoods Inc., which provides foreclosure counseling and helps people restructure their debt and mortgages; Goodwill Financial Opportunities Center which also provides budget and foreclosure counseling; Legal Services which provides legal intervention and education about foreclosures and evictions; and Summit Pointe Housing is the Housing Access Resource Agency (HARA) for Calhoun County which provides eviction prevention services and help for homeless people to find housing. Summit Pointe Housing helps homeless people through four funding streams, three of which receive funding from the Michigan Housing Development Authority (MSHDA). Calhoun County Department of Health and Human Services, Salvation Army and Community Action also provide security deposit and utility assistance to prevent and resolve homelessness.

The Homeless Coalition has negotiated discharge protocols with local police departments and hospitals in past years. There is a need to reexamine these protocols with the Calhoun County Jail, Calhoun County Sheriff's Department, the Battle Creek Police Department, and the two local hospitals, Bronson Battle Creek near downtown and Oakland Hospital in Marshall. Integrated Health Partners provided medical case management and follow-up to frequent users of emergency rooms. Work needs to be done with all of these organizations to provide greater homeless prevention services.

The Haven's 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.

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, affordable housing in Battle Creek for low-income families and individuals. Homeless people can seek housing assistance from Summit Pointe Housing located in the SHARE Center. A housing case manager works with families and individuals to see if they qualify for available housing assistance. The first step is always to obtain Social Security cards and birth certificates. The Haven, the SHARE Center, Summit Pointe Housing 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.

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. Southwest Michigan Community Development Corporation 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 limited supportive permanent housing, currently three single family units for families and 15 units for individuals.

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 public housing units, administers the Housing Choice Voucher program and owns and manages 24 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 – (24) 2, 3, and 4-bedroom single family homes

The public housing units provided by the Battle Creek Housing Commission are in good condition and currently there are 51 families on the waiting list. The Housing Commission receives from \$350,000 to 450,000 yearly for renovation and maintenance expenses from HUD'S Capital Fund Program. In 2019, the Commission received a \$643,073 grant.

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 608 vouchers in Battle Creek, Albion and Portage. The majority of vouchers are in Battle Creek (544). The current waiting list is estimated at 225.

In 2019, the Commission received \$3,063,505 for its Housing Choice Voucher program.

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. The opportunity for homeownership provided the needed incentive for these families.

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

During the program year the Battle Creek Housing Commission conducted resident input meetings to obtain feedback regarding the types of activities and improvements which are most needed and would

provide the greatest benefit to Public Housing residents and the community. The general public as well as members of local government were extended invitations to participate in these meetings. The meetings are also used to inform residents of planned facilities improvements and serve to assure the proper expenditure of Capital Grant Funds.

Actions taken to provide assistance to troubled PHAs

The Battle Creek Housing Commission is not and has never been a troubled public housing authority.

DRAFT

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 City of Battle Creek completed two housing studies and one review of redevelopment practices in recent years that speak to the impact of public policies on affordable housing. No ordinances were specifically identified as creating a barrier to the development of affordable housing, but a number of procedural changes and new policy ideas were proposed for further consideration by the City. In 2013, McKenna Associates prepared a comprehensive housing study and an analysis of impediments to fair housing that recommended a number of specific ordinance amendments and development incentives. In 2015, the City was selected as a Redevelopment Ready Community (RRC) program participant by Michigan Economic Development Corporation which involved an assessment of the City's community revitalization efforts and provided recommendations for improving redevelopment efforts. These reports are available online at www.battlecreekmi.gov/186.

Actions that have been taken in recent years include:

- The City hired Paul Fate and Associates in 2019 to complete an assessment of the community development delivery system in Battle Creek. This report assessed current market conditions, strengths and gaps in housing and neighborhood strategy, national best practices for creating vital cities, the state of nonprofit capacity and recommendations for strengthening the ecosystem. Available at: <http://www.battlecreekmi.gov/DocumentCenter/View/6150>.
- The City's Planning Division made a number of changes to its development review policies and procedures to improve and expedite service to the community and developers including: offering conceptual site plan review meetings for applicants; incorporating neighborhood planning council outreach information into the public participation strategy; and creating greater clarity around the development process by adding development review process flowcharts with timelines to the city website.
- Held a number of community conversations on the City's building inspections process that resulted in the creation of an advisory group with citizen and stakeholder representation that recommends changes to inspections policies and procedures.
- Modified the City's Vacant and Abandoned Buildings ordinance to create greater accountability around the most derelict properties while easing some provisions in order to help private owners return properties to productive use. Many of these properties are located in low- and moderate-income neighborhoods.

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; 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, which has seen decreased funding in most years, funds were allocated to preserve affordable housing by funding rehabilitation of housing and by providing tenant-based rental housing in partnership with nonprofit organizations. With the onset of the coronavirus pandemic, the need for rental assistance increased dramatically, whereas demand for home owner rehab declined due to the need for social distancing. As a result, City staff reprogrammed its 2019 HOME funds through an amendment to the 2019 Annual Action Plan, reducing home owner rehab funds and increasing TBRA to meet the need.

While almost all funded activities occur in low- and moderate-income areas, the unmet need is large. The City has 453 registered vacant buildings; over a thousand people experience homelessness each year; 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. The 2014 public engagement process and needs assessment for the Consolidated Plan informed these allocation priorities. Numerous public workshops are held each year to ensure that the strategies developed continue to address priority 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.

Since then the group has grown substantially. The task force is now 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. The group has been meeting 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.

In October of 2016 the task force released its “Get the Lead Out” Comprehensive Plan to address lead poisoning in Calhoun County.

In 2017, the City applied for and was awarded a \$1.5 million CHIP Medicaid Lead Hazard Control Grant from the Michigan Department of Health and Human Services (MDHHS). Families with a child enrolled in the CHIP Medicaid program are eligible to have a lead assessment conducted and all lead hazards abated through the program. Program priorities are children under age six with an elevated blood lead level and families with children under age 6 living in high risk areas. All of the high risk areas in Battle Creek are within CDBG Revitalization areas. The program is expected to affect 25 households annually.

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 during the 2018-19 program year which addressed the causes, as well as the symptoms of poverty, included the following:

- Housing rehabilitation for low- and moderate-income individuals unable to secure financing to address health, safety, and accessibility issues in their homes.
- Financial literacy and budgeting classes offered through SWMCDC to encourage asset growth and proper money management techniques and responsible use of credit.
- Tenant-based Rental Assistance to assist people that are trying to get back on their feet with access to affordable housing.

Other actions include collaborative efforts through the Battle Creek Area Homeless Coalition and BC Vision such as:

- Increasing the number of landlords participating in leasing to extremely low-income, homeless or at risk individuals through the Rental Round Table.
- A Workforce development action team made up of work force agencies, as well as business and education leaders to increase workforce readiness training and host a jobs and resource fair for unemployed residents.

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 Coordinating Council, the Housing Solutions Board 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 including the application for State of Michigan Housing and Hardest Hit Fund grants.

The City has provided technical assistance to Battle Creek Area Habitat for Humanity around becoming a Community Housing Development Organization (CHDO) for the HOME Program. The Battle Creek Area Habitat for Humanity was able to add four new low-income members or members that live in the CBDG LMI areas to its Board of Directors. Habitat was certified as a CHDO by the City in April, 2016 and by the State of Michigan in July, 2017. Habitat was awarded \$60,000 in State HOME funds in 2019.

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.

The City continued to assist in the coordination of community engagement and visioning efforts throughout the program year. City representatives participated and provided leadership in BC Vision, an ongoing community-wide economic development effort. The City continued to work closely with partners in engaging citizens, inviting the CCLBA and Neighborhoods Inc to be co-facilitators of engagement workshops during the program year, in order to bring additional expertise to bear on issues residents had previously highlighted.

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 and BC Vision.

Rental Roundtable

Nonprofit housing and homeless service providers working with homeless families and individuals wanted to improve relationships with area landlords and to educate area landlords about their rights and responsibilities as rental property owners. The goal of the rental property owners outreach is to develop better relationships with owners of rental housing to provide more opportunities for homeless families and individuals to find safe, affordable housing.

Providers started meeting in the summer of 2015 to discuss coordinating housing services and outreach to rental property owners and called themselves the Rental Housing Roundtable, a committee of the

Battle Creek & Calhoun County Homeless Coalition. The work of the Rental Housing Roundtable has been to:

- Educate each other about housing issues and to get to know each other
- Promote and expand Legal Services' Eviction Diversion program and work with Monday's Landlord-Tenant Court
- Organizing outreach and education to rental property owners

The Rental Housing Roundtable initiated hosting meals for area rental property owners with presentations about available nonprofit services, City services and rental assistance. Events are held quarterly and typically attended by 35 to 55 participants.

Calhoun County Lead Task Force

In 2015, the Community Development Division (CDD) partnered with the Calhoun County Public Health Department (CCPHD) to reconstitute the Calhoun County Lead Poisoning Prevention Task Force, a collaborative that has since grown to include 16 organizations. The task force's work is directed by its "Get the Lead Out" plan of action, published in October 2016. The plan includes goals in three areas: increasing lead testing for children ages 0-6; increasing awareness and public education regarding the hazards of lead; and remediating lead in homes and the environment.

In 2017, the City applied for and was awarded a \$1.5 million CHIP Medicaid Lead Hazard Control Grant from the Michigan Department of Health and Human Services (MDHHS). This grant is being implemented in partnership with other members of the lead task force. Community Action Agency is an external partner on the grant and is providing lead abatement assessments and abatement management services to families living in the areas of the county outside the city. Outreach and services to participating families is coordinated between CCPHD and city staff.

BC Vision

BC Vision BC Vision is a community-wide economic development effort being led and supported by a wide range of community stakeholders including the City of Battle Creek, the Kellogg Company, the WK Kellogg Foundation, the Battle Creek Community Foundation, Battle Creek Unlimited, local school districts, the WK Kellogg Community College, and dozens of non-profits, employers, small businesses, and resident groups. BC Vision has six action teams: College and Career Readiness, Kindergarten Readiness, Culture of Vitality, Workforce Development, Small Business, and Large Business. The City of Battle Creek is very much involved in the work of BC Vision, particularly in the area of creating a culture of vitality. The Battle Creek City Manager is on the BC Vision steering committee and the Assistant City Manager is one of the co-chairs off the Culture of Vitality action team. Numerous city staff from various city departments are participating in the culture of vitality action team.

The City applied for and was awarded a \$1.5 million economic and community development grant fro

the W.K Kellogg Foundation (WKKF) in 2017. About half of this grant is for the creation of a housing program that strengthens neighborhoods by offering incentives to Battle Creek Public School teachers to purchase homes within the school district. This program is being evaluated along with WKKF grants to Michigan Works and the Battle Creek Public School District around employment and education in low and moderate income neighborhoods in Battle Creek. The combined evaluation is intended to increase collaboration by creating shared goals and outcomes.

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.

The City contracted with the Fair Housing Center of Southwest Michigan during the 2019-20 program year to conduct 9 fair housing trainings that resulted in 74 individuals being trained on fair housing rights.

The City continued its work with the Human Relations Board to increase constructive communication among all people regardless of race, ethnicity, color, religion, national origin, sex, age, height, weight, marital status, physical or mental disability, family status, sexual orientation, gender identity, or socioeconomic status to promote productive relationships and equitable access to community resources for all. The board reviewed and advised on all fair housing issues including the results of the 2018 systemic investigations.

City staff serve as members of the “Beyond Separation” Design Team of the Truth, Racial Healing, and Transformation (TRHT) Initiative. TRHT is a community-wide collaborative initiative funded by the W.K. Kellogg Foundation focused on creating a racial equity movement in Battle Creek. The Beyond Separation team is focused on housing and addressing segregation and is comprised of representatives from the City, the Battle Creek Area Association of Realtors,

the Fair Housing Center of Southwest Michigan, the Urban League, and community members.

The Beyond Separation team created a 10 page homebuyers guide as a response to an ask from the African American community to provide better information about the home buying process. The guide uses all local pictures and models and is being disseminated by the Urban League, the City, and the Realtor Association. Available at: www.battlecreekmi.gov/566

Beyond Separation held a community forum on housing and segregation at New Level Sports in February with over 50 participants. The forum promoted the home buyer guide and was used to gather input and data for the City's Consolidated Plan and the Beyond Separation strategic plan.

Staff created a 2019 Fair Housing Report which chronicled four years of Fair Housing work in Battle Creek using source documents and narrative collected from City staff activities, Fair Housing Center trainings, systemic investigations, and events; Human Relations Board community engagement sessions; and TRHT events and initiatives. The report is available online at: www.battlecreekmi.gov/566

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 monitors all sub-recipients every program year. 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 address. 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 inspections 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 Housing Quality Standards (HQS) inspection by a Code Compliance officer. All units assisted are also 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 Rental 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.

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 December 3, 2020 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, December 15, 2020, at 7:00 p.m. for the purposes of hearing public comment on the Consolidated Annual Performance Evaluation Report (CAPER).

A copy of the CAPER was made available from Monday, December 7, 2020, through Tuesday, December 22, 2020 online at www.battlecreekmi.gov/183.

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 amended its 2019 Annual Action Plan to include the allocation of \$729,334 CARES Act CDBG-CV funds for the purpose of converting the City's Full Blast recreational facility into temporary shelter for the homeless, providing rental and utility assistance, housing case management, hotel vouchers for domestic violence victims, and an affirmative marketing assessment to identify and develop a marketing strategy for populations least likely to access provided assistance. The City also reallocated funds programmed for home owner rehab to add TBRA funds to help relocate families displaced during the crisis.

Even with additional housing funds from the State it is expected that the resources for rent and utility assistance will not meet the demand from displaced households going into 2021. Also, it is expected that an increase in mortgage and tax delinquency will begin to present a problem. City staff will continue to monitor these areas and may consider further amendments to its plans to address emerging needs.

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

No

CR-50 - HOME 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 §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.

All Rental 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.

The only properties that are subject to this requirement are 18 N Wabash Ave. and 94-96 Harvard St., both of which were inspected in August of 2019.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units.

92.351(b)

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. When our CHDO was slow to rent and sell assisted properties, the City required a monthly report on marketing activities. All properties were sold or rented with 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

A total of \$18,334.50 in program income from the previous program year was expended in the first quarter of the 2019-20 program year. These funds were committed to a single-family owner-occupied rehab project.

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

The City of Battle Creek continues to strengthen its relationship with the local Habitat for Humanity as a CHDO. The City was approached by two other organizations and provided technical assistance in CHDO certification process. Providing this assistance has not yet resulted in CHDO certification.

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